DISD Inclusion Policy

Date	Review Date	Lead Policy Writer(s)	Leader(s) Responsible
October 2026	October 2027	Susan Rötsch, Head of Inclusion	Patricia Reisyan, Principal; Susan Rötsch, Head of Inclusion

1. Introduction

Vision and Inclusive Ethos

Every student at DISD learns, develops and belongs – in a safe, supportive and appropriately challenging common learning environment. Support begins with removing barriers, not with a diagnosis.

The Deutsche Internationale Schule Dubai (DISD) – German International School Dubai is an inclusive school. We welcome students of determination and all students who experience barriers to learning and participation, and we are committed to giving every student equitable access to high-quality education alongside their peers – regardless of disability, diagnosis, learning difficulty, language, social or emotional needs, health or family circumstances.

We see diversity as a strength for the whole school community. Inclusion is not a project but a shared responsibility that shapes our culture, teaching, leadership and everyday school life.

Purpose of this Policy

This policy sets out DISD's commitment to inclusive education and its policy of provision for students of determination. In line with KHDA requirements, it describes:

- how students who experience barriers to learning are identified
- how individual support is planned and reviewed
- the graduated system of support available through the Standard School Service
- how parents and students are involved in planning and decision-making
- the range of services available to support students and their teachers
- the principles of admission for students of determination

The policy is a public document for the KHDA, parents and staff. It is published on the school website.

Scope

This policy applies to all phases of the school, from Kindergarten to Grade 12. It applies to all teaching and support staff and to every area of school life, including extra-curricular activities, school trips and events. It also applies to Individual Learning Support Assistants (iLSAs) employed by parents while they work at the school.

Regulatory Framework

As a private school in Dubai, DISD operates within the regulatory framework of the Knowledge and Human Development Authority (KHDA). As a German School Abroad (Deutsche Auslandsschule), DISD also follows the requirements of the Standing Conference of the Ministers of Education (KMK) and the Federal-State Committee for School Work Abroad (BLASchA).

UAE, Dubai and KHDA	German framework (KMK / BLASchA)
UN Convention on the Rights of Persons with Disabilities, Art. 24 Federal Law No. (29) of 2006, as amended Cabinet Resolution No. (3) of 2018 Dubai Law No. (3) of 2022 Executive Council Resolution No. (2) of 2017 KHDA Administrative Resolution No. (15) of 2026 Dubai Inclusive Education Policy Framework (2017) KHDA Directives and Guidelines for Inclusive Education KHDA Guide for Implementing the Categorisation System KHDA Guidelines and Standards for External Assessment Reports UAE School Inspection Framework	German Schools Abroad Act (Auslandsschulgesetz), § 9 (1) No. 7 Guidance on Inclusion at German Schools Abroad (2014, as amended 2025) Recommendations on Reading, Spelling and Arithmetic Difficulties (2010, as amended 2025) Principles of Target-Different Inclusive Education (2017) Directive on Examination-Related Compensation for Disadvantage (2024) Directive on Educational Pathways and Qualifications in Lower Secondary (2026) Sek I-PO and DIA-PO, as amended

KHDA requirements apply to the whole school. For German educational pathways, assessment and grading, and German school-leaving examinations, the KMK requirements also apply. Where the two frameworks differ, the school meets both, and this policy shows the difference explicitly.

Relationship to Other Documents

This policy is the public statement of DISD's principles and commitments on inclusion. It is supported by internal documents:

- **DISD Inclusion Concept:** the pedagogical framework, with detailed structures, roles, processes and quality assurance
- **DISD Inclusion Admissions & Capacity Framework:** the operational admissions procedure for students of determination
- **Current job descriptions:** the binding descriptions of all inclusion roles

Where this policy summarises a procedure, the internal documents set out the operational detail.

2. Aims and Objectives

Guiding Principles

- **Shared responsibility:** inclusion is the task of the whole school; teachers remain responsible for all students in their classes.
- **Support before diagnosis:** support is based on the barriers a student experiences, not on a diagnostic label.
- **Graduated support:** general, targeted and individualised support (Support Levels 1 to 3).
- **Independence and impact:** support aims at independence and measurable progress, not at the number of support hours.
- **Participation and transparency:** parents and students are involved early; decisions are evidence-based and traceable.

Aims of this Policy

Through this policy, DISD aims to:

- ensure equitable access to admission, the full curriculum and all areas of school life
- identify barriers early and provide graduated, evidence-based support through the Standard School Service
- plan and review support with parents and students through Student Profiles and IEPs
- enable every student to progress towards challenging goals and recognised qualifications or suitable pathways
- apply access arrangements fairly and consistently, in line with KHDA and KMK requirements
- build a trusting partnership with parents in which their concerns are fully considered
- develop staff expertise and monitor the impact of provision for continuous improvement

3. Roles and Responsibilities for the Policy

Inclusion is a shared responsibility of the whole school community. Class and subject teachers remain responsible for the learning, progress and participation of every student in their classes. The Inclusion Department advises, supports and complements their work, but does not take over this responsibility. The roles below reflect the structure of the DISD Inclusion Concept and the current job descriptions.

Nothing in this policy alters the existing governance, management, approval or signatory authorities of DISD. Pedagogical responsibility remains with the Principal and School Leadership. Administrative, financial, contractual, HR and operational implementation is coordinated through the General Manager in accordance with the approved organisational structure, budget and Board decisions.

3.1 Role of the Principal and Leadership Team

The Principal is the school's **Inclusion Champion** and holds overall responsibility for inclusive education at DISD. The Principal will:

- ☑ ensure that this policy is implemented, monitored, reviewed and adequately resourced
- ☑ chair the Inclusion Governance Team and lead the Inclusion Support Team in line with KHDA requirements
- ☑ make the final decision on the admission of students of determination, on the recommendation of the Head of Inclusion, and sign any KHDA Non-Admission Notification
- ☑ approve school-based access arrangements and deviations from grading principles, and forward applications for examination-related compensation for disadvantage with a recommendation to the KMK Commissioner
- ☑ agree target-different education with parents and notify the KMK Commissioner where required

The Leadership Team ensures that inclusive practice is embedded in lesson planning, assessment, conferences, timetabling and professional development.

3.2 Role of the Inclusion Governor (Board)

The Inclusion Governor is a member of the Board and of the Inclusion Governance Team, and will:

- ☑ anchor inclusive education at governance level and support its strategic development
- ☑ monitor whether inclusion is considered in strategic, financial and resource decisions
- ☑ take part in the annual review of this policy and of the Inclusion Action Plan

The Inclusion Governor does not take part in individual casework and receives only anonymised or aggregated information.

3.3 Role of the Head of Inclusion (Policy Leader)

The Head of Inclusion is the lead writer of this policy, a member of the Extended School Leadership and responsible for the strategic and professional leadership and coordination of the Inclusion Department within the school's approved governance, staffing and budget framework. The Head of Inclusion will:

- ☑ develop and review the Inclusion Policy, the Inclusion Concept and quality standards, and lead the Department SENDCos
- ☑ plan and coordinate the staffing and resource needs of the Inclusion Department within the approved staffing plan and budget, and set quality standards for iLSAs; personnel decisions, contractual commitments, creation of positions and expenditure remain subject to the school's established approval authorities
- ☑ lead the Inclusion Admissions Process and make the admission recommendation to the Principal
- ☑ coordinate KMK applications for examination-related compensation for disadvantage and all KHDA-related matters, including inspections

- ☑ plan professional development in inclusion and report on the effectiveness of provision to the Principal and Leadership Team; governance reporting to the Board is anonymised and aggregated

3.4 Role of the Department SENDCos

Each phase (Kindergarten, Primary and Secondary) has a Department SENDCo, who is the main operational contact for inclusion in that phase and will:

- ☑ lead screenings, identification and the review of external assessment reports
- ☑ manage all cases in the phase and lead IEP planning meetings with parents and, where appropriate, the student
- ☑ prepare and quality-assure Student Profiles, IEPs and school-based access arrangements, and coordinate the reviews held at least three times per year
- ☑ lead and guide Support Teachers and LSAs, and check the implementation of agreed measures through observations and walk-ins
- ☑ act as the central contact for teachers and parents and offer a fixed weekly consultation hour

3.5 Role of Support Teachers

Support Teachers are teachers with a qualification in special educational needs. The Support Teacher will:

- ☑ plan and deliver targeted support individually or in small groups (pull-out), and support learning in class through push-in and co-teaching
- ☑ develop, implement and review IEP targets with the Department SENDCo and document progress
- ☑ provide adapted materials and advise teachers on differentiation and access arrangements
- ☑ guide the assigned LSAs and iLSAs in daily practice

3.6 Role of Learning Support Assistants (LSAs)

LSAs are employed by DISD and support students in class so that they can participate fully in regular lessons. Under the guidance of the Support Teacher and the Department SENDCo, the LSA will:

- ☑ provide push-in support and implement adapted materials
- ☑ support participation through structure, attention guidance and clarification of instructions
- ☑ carry out structured observations, document support daily and collect evidence for IEP reviews
- ☑ report safeguarding concerns and significant changes to the Department SENDCo without delay

LSAs do not carry out assessments, set IEP targets or communicate educational decisions to parents unless explicitly asked to.

3.7 Role of Individual Learning Support Assistants (iLSAs)

Where individual 1:1 support is identified as necessary beyond the provision available through the Standard School Service, the school works with parents to determine the appropriate individualised provision in accordance with current KHDA requirements. Where an iLSA is individually employed by parents, the iLSA is not an employee of DISD but must comply with the school's safeguarding, professional, confidentiality and operational requirements. The iLSA will:

- ☑ follow all school policies and procedures, including safeguarding, confidentiality and the code of conduct, and take part in the school's induction
- ☑ work on the basis of the Student Profile and IEP, guided by the Department SENDCo and the assigned Support Teacher
- ☑ support only the assigned student and document agreed observations in the school's systems
- ☑ work towards the greatest possible independence of the student

Supervision always remains with the teacher present. An iLSA does not replace the support provided through the Standard School Service, and admission is never conditional on parents providing an iLSA. Where additional paid individualised provision is arranged, the applicable KHDA requirements, including an Individualised Service Agreement (ISA) where required, are followed.

3.8 Role of the School Counsellor and School Psychologist

The School Counsellor and the School Psychologist are professional members of the Core Inclusion Support Team. They contribute their social-emotional and psychological expertise to case analysis and planning, take part in the usually monthly multidisciplinary case meetings, and advise students, parents and staff where students have social, emotional or mental health needs.

3.9 Role of Teachers

Class and subject teachers are responsible for the progress and participation of every student in their classes. Teachers will:

- ☑ provide high-quality, differentiated teaching based on the principles of Universal Design for Learning
- ☑ implement the classroom accommodations and access arrangements in the Student Profile, including in class tests
- ☑ observe students, document first measures and refer concerns via the school's referral system
- ☑ contribute to IEPs and meetings with parents, and work closely with the Inclusion Department
- ☑ take part in inclusion workshops and other professional development on inclusive practice

3.10 Role of Students

In an age-appropriate way, students will:

- ☑ share their views, strengths and wishes, and contribute to their Student Profile and IEP
- ☑ take part in setting and reviewing their goals and learn to explain what helps them learn
- ☑ contribute to an inclusive school culture; student voice is also represented in the Inclusion Governance Team where appropriate

3.11 Role of Parents

Parents are important partners of the school and experts on their child. Parents are invited to:

- ☑ share relevant information about their child's development, needs, previous support and external reports
- ☑ take part in the development and review of the IEP and sign the IEP
- ☑ work with the school on agreed strategies and inform it of significant changes
- ☑ give consent where required and raise concerns early (see 4.10); parent voice is also represented in the Inclusion Governance Team where appropriate

4. Policy

This section sets out DISD's policy of provision for students of determination and all students who experience barriers to learning and participation.

4.1 Key Terms

DISD uses the terminology of the KHDA Categorisation System:

- **Student of Determination (SoD):** a student with a formal diagnosis from a qualified and appropriately licensed professional that corresponds to one of the recognised KHDA disability categories. Students of Determination are categorised according to the KHDA Categorisation System and reported to the KHDA as required.
- **Identified Student:** a student for whom the school has identified, through evidence-based assessment, observation, screening and/or documented intervention, a SEND-related barrier to learning or participation, but for whom no formal diagnosis is available. Identified Students are assigned to the relevant KHDA barrier category.
- **Monitoring:** a temporary internal DISD status used where a possible barrier or additional need has been identified but further observation and evidence are required before determining whether the student should be recorded as an Identified Student. Monitoring is not a KHDA category or a Support Level; operational details are set out in the DISD Inclusion Concept.
- **Support Levels 1 to 3:** the intensity of support the school provides, independent of a diagnosis (see 4.5).
- **Standard School Service:** support provided as part of regular provision, without additional charge.

- **Gifted & Talented:** an internal DISD designation, not a KHDA category; a student can also be twice exceptional.
- **Inclusion Register:** the internal overview of all students above; a Student Profile is kept for each of them.

4.2 Inclusion Structure

Inclusion at DISD combines strategic governance with an operational Inclusion Support Team, supported by collaborating professionals:

- **Inclusion Governance Team:** provides strategic oversight, governance and quality development. Members are the Principal (Inclusion Champion), Head of Inclusion, Inclusion Governor and, where appropriate, a Parent Representative and a Student Representative.
- **Inclusion Support Team:** coordinates and delivers inclusive provision. It is led by the Principal and includes the Head of Inclusion, Support Teacher representation and Learning Support Assistant representation. At DISD, the structure is extended through the phase-based Department SENDCos and relevant multidisciplinary professionals.
- **Collaborating Professionals and External Partners:** include, as relevant, class and subject teachers, School Counsellor, School Psychologist, iLSAs, the language support team, therapists and external specialists.

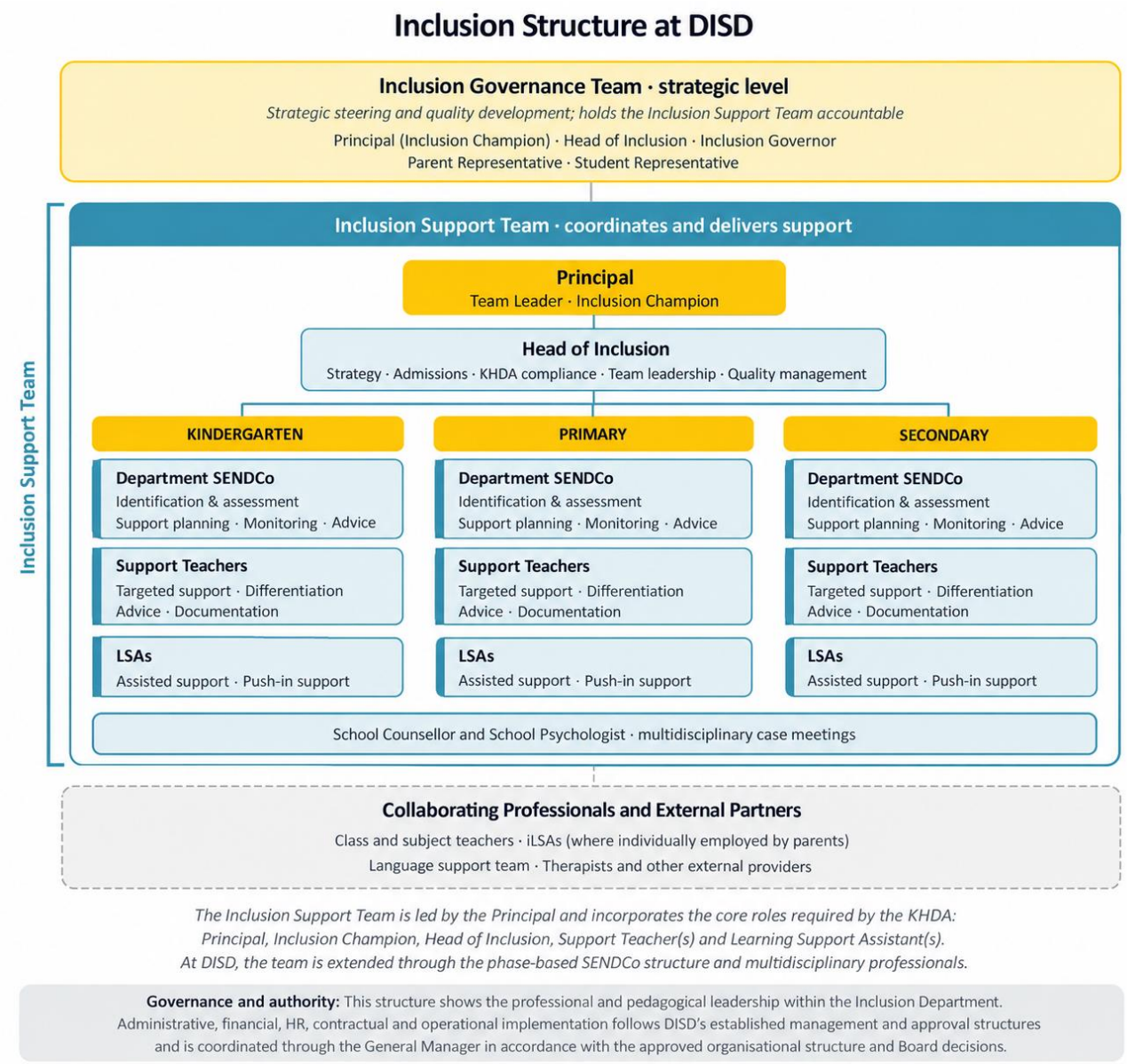


Figure 1: Inclusion governance and operational support structure at DISD

The diagram shows the professional and pedagogical inclusion structure. Administrative, financial, HR, contractual and operational implementation follows DISD's established management and approval structures and is coordinated through the General Manager in accordance with the approved organisational structure and Board decisions.

The Inclusion Support Team is led by the Principal and incorporates the core roles required by KHDA. DISD extends this structure through its phase-based SENDCo model and multidisciplinary collaboration. Governance oversight and operational casework remain distinct.

The Inclusion Support Team works through regular documented review, multidisciplinary collaboration and follow-up of agreed actions. Detailed meeting structures and operational procedures are set out in the DISD Inclusion Concept.

4.3 Admissions of Students of Determination

DISD welcomes applications from students of determination. A disability, diagnosis or support need is never, in itself, a reason to refuse admission.

Principles

- Students of determination have the same right as all other students to apply and to be admitted; no medical diagnosis is required.
- Admission is never conditional on an iLSA, external therapy or criteria such as "sufficient independence".
- The entry assessment is not a pass/fail test; it identifies strengths and support needs for planning.
- Parents are asked to share existing reports and plans, which are treated confidentially.

Admissions Process

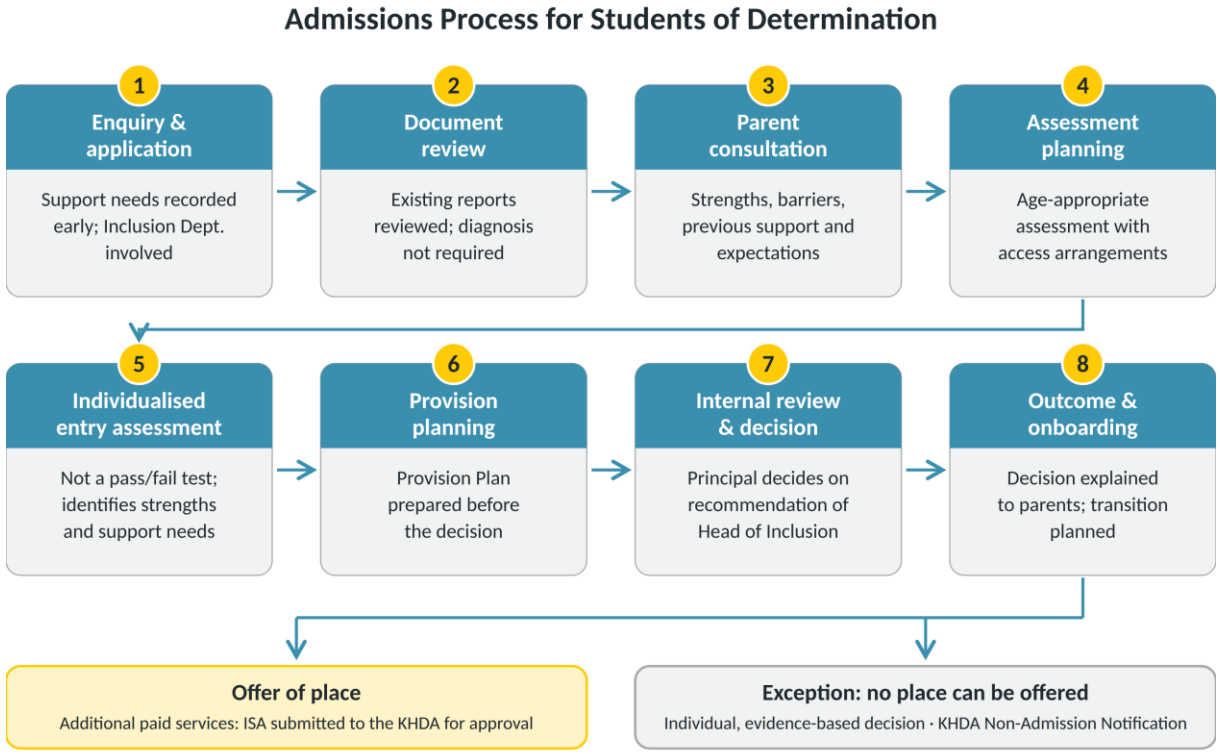


Figure 2: Admissions process for students of determination

The entry assessment is planned with suitable access arrangements, for example extra time, a reader or scribe, adapted materials, an interpreter or assistive technology. A Provision Plan is prepared before the decision. The final decision is made by the Principal, on the recommendation of the Head of Inclusion. After admission, the Provision Plan becomes the Student Profile and, depending on the support level, the IEP.

Individualised Service Agreement (ISA)

If a student needs additional, paid individualised services beyond the Standard School Service, the scope, responsibilities and costs are agreed transparently with the parents and documented in an Individualised Service Agreement (ISA). The ISA is signed by the school and the parents and submitted to the KHDA for approval. The services begin only after KHDA approval. Any changes to the ISA are also submitted to the KHDA.

Non-Admission and Waiting List

Non-admission of a student of determination is an exception. It is never based only on the result of an entry test. If, after the individualised assessment and provision planning, the school is exceptionally unable to offer a place, the decision is documented individually and on clear evidence. The school then follows the KHDA Non-Admission Notification procedure and informs the parents transparently. All admission and non-admission decisions are made in accordance with the current DISD Admissions Policy and applicable KHDA requirements.

If a year group is fully enrolled, a student of determination may be placed on the waiting list under the school's general waiting-list rules. This decision is based only on general year-group capacity, never on disability, diagnosis or support need. The KHDA Non-Admission Notification procedure is also followed in this case.

Capacity Planning and Review of Provision

The school reviews its inclusion capacity at system level and plans resources in good time; this review is separate from individual decisions and is never used as a quota. After admission, the provision is reviewed with the parents at least three times per school year. Increased support needs do not automatically lead to a change of school. Details are set out in the DISD Inclusion Admissions & Capacity Framework.

4.4 Identification, Referral and Assessment of Need

The school identifies barriers early, through year-group assessments, SEND screenings, classroom observations and concerns raised by teachers, parents or students. Teachers first put measures in place within the class, document them and then refer the student via the school's referral system.

The Department SENDCo leads a holistic assessment of need, taking into account screenings, observations, progress data, previous interventions, student and parent voice, external reports and functional needs. A screening result alone never decides. Outcomes range from continued class support or time-limited Monitoring to inclusion in the register with a support level, or a recommendation for an external assessment. Parents are involved throughout.

External Assessment Reports

An external assessment is recommended only when it answers a specific question. External reports are reviewed by the Department SENDCo, and their recommendations are checked for relevance and feasibility before they are reflected in the Student Profile and IEP. In line with the KHDA External Assessment Guidelines, reports have **no fixed expiry date**: the age of a report alone is not a reason for a new assessment, and long-term or permanent diagnoses are not routinely re-assessed.

For particular difficulties in reading and spelling, a formal psychological assessment is not required for school-based support or for school-based access arrangements where the applicable KMK provisions allow the need to be established through standardised pedagogical assessment. Arithmetic difficulties are assessed pedagogically for support purposes but are subject to separate KMK rules regarding assessment and grading. Separate requirements apply to KMK examination-related applications (see 4.7.3).

4.5 Support Services and Support Levels

The following support services are part of the **Standard School Service**. They are provided by the school as part of its regular provision, without additional charge to parents.

Overview of Support Services

Service	For whom	Provided by
For students		
High-quality, differentiated teaching (Universal Design for Learning) and classroom accommodations	All students	Class and subject teachers
Screenings to identify possible support needs	All students	Department SENDCos, teachers
SEND screenings and reviews of progress, targets and support levels, three times per year	Students in the Inclusion Register	Department SENDCos, Support Teachers
Student Profile and, from Level 2, an IEP	Students in the Inclusion Register	Department SENDCos, Support Teachers
Targeted pull-out support, individually or in small groups	Mainly Levels 2 and 3	Support Teachers
Push-in support and co-teaching in class	Levels 1 to 3, as planned	LSAs, Support Teachers
School-based access arrangements (Nachteilsausgleich)	Students with appropriate professional diagnostic evidence and a documented functional barrier; for reading and/or spelling difficulties, standardised pedagogical assessment may establish the need in accordance with KMK provisions; decided individually (see 4.7.1)	Department SENDCos, report conference, Principal
Advice and support with applications for examination-related access arrangements	Students in examination year groups who meet the KMK requirements (see 4.7.3)	Head of Inclusion, Department SENDCos
Enrichment and differentiation	Students with a Gifted & Talented designation	Teachers, Inclusion Department
Transition planning	Students in the Inclusion Register	Department SENDCos
For teachers		

Service	For whom	Provided by
Advice and coaching, including a fixed weekly consultation hour in each phase (three per week), and professional development	All teachers and group leaders	Department SENDCos, Head of Inclusion
For parents		
Parent meetings (at least three per year), parent coaching, Inclusion Newsletter, Parent Café and information events	Parents of students in the Inclusion Register; information events for all parents	Inclusion Department

Graduated Approach: Support Levels 1 to 3

DISD follows a graduated approach of general, targeted and individualised support. The level describes the intensity of support the school provides. It does not depend on a formal diagnosis: a student without a diagnosis can receive Level 2 or 3 support, and a student with a diagnosis can receive Level 1 support.

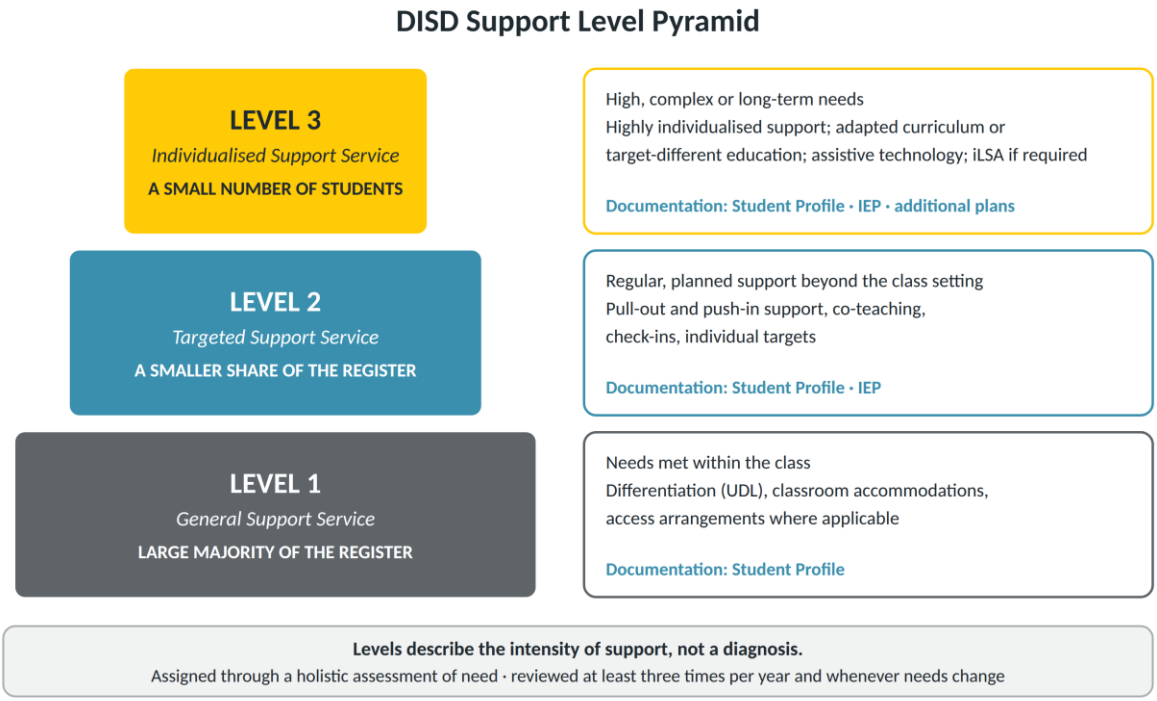


Figure 3: DISD Support Level Pyramid

Level 1 covers the large majority of students in the Inclusion Register, whose needs are met within the class. Level 2 adds regular, planned targeted support beyond the class setting. Level 3 provides intensive, individualised support for a small number of students with high, complex or long-term needs, including, where appropriate, target-different education (see 4.7.4) or an iLSA.

Assignment and Review of Levels

The Department SENDCo assigns the support level on the basis of the holistic assessment of need. The level is reviewed at least three times per school year and whenever needs change significantly. The level

can move in either direction. A reduction in level is a success and is discussed with parents in the same way as an increase.

Principles of Support

Differentiated teaching is the responsibility of every teacher. Pull-out support is targeted, time-limited and closely linked to classroom learning, and all support aims at independence and measurable impact.

Phase-Specific Provision

- **Kindergarten:** play-based pull-out sessions in small groups in rotating themes (e.g. social skills, attention, motor skills, language) and push-in support by LSAs in the groups.
- **Primary:** pull-out support in small groups in German and mathematics, concentration training (Grades 1–4), evidence-based programmes for reading, spelling and number skills, and push-in support by LSAs.
- **Secondary:** weekly check-ins with the Support Teacher, push-in support by LSAs in Grades 5–10, and subject-related pull-out booster sessions, including examination preparation.

Grades 5 and 6 are a phase of particular support and observation before placement in an educational pathway (KMK).

Additional Services beyond the Standard School Service

Some students need additional, individual services, for example 1:1 support by an iLSA or external therapies. iLSAs are employed by the parents, and external providers are independent (see 4.11). Where the school itself provides additional paid individualised services, these are documented in a KHDA Individualised Service Agreement (see 4.3).

Accessibility

DISD aims to make its premises and learning environments accessible, in line with the Dubai Universal Accessibility Code. Accessibility includes physical access and access to learning through structured learning arrangements, adapted materials, communication support and assistive technology. Where necessary, reasonable adjustments are agreed individually for each student.

4.6 Planning and Reviewing Support: Student Profile and IEP

A **Student Profile** is kept for every student in the Inclusion Register. It shows strengths, barriers, support level and KHDA category, effective strategies, classroom accommodations and access arrangements, responsibilities, relevant assessment results, and student and parent voice. It is updated at least three times per school year and whenever there are relevant changes.

As a DISD standard, an Individual Education Plan (IEP) is part of the Student Profile for every student on Level 2 or 3, with or without a diagnosis:

- It is developed **within six weeks** of admission or of the assignment of Level 2 or 3, in a planning meeting led by the Department SENDCo with the parents and, where appropriate, the student.
- It is **signed by the parents and the responsible teacher**.
- It contains SMART targets, measures, responsibilities, success criteria and documented progress.

- Targets and measures are reviewed continuously; in addition, structured SEND screenings and reviews take place at least three times per year, when targets, measures and the support level are adjusted.

Additional plans (e.g. Behaviour Support, Safety or Transition Plans) are added where needed. The IEP also serves as the KMK support plan (Förderplan), and support documentation is kept so that it can be used for KMK applications (see 4.7.3). At the end of each year, a summary evaluation forms the basis for the end-of-year meeting and the handover.

4.7 Curriculum Access, Assessment and Examinations

4.7.1 Classroom Accommodations and School-Based Access Arrangements (Nachteilsausgleich)

Access arrangements compensate for a documented barrier so that a student can demonstrate their knowledge and skills without changing the academic requirements. A formal diagnosis does not automatically result in access arrangements; the functional impact on learning and assessment must be considered individually. As a general DISD principle, formal access arrangements for assessed work are based on appropriate professional diagnostic evidence of the underlying impairment or condition and a documented functional barrier. An exception applies to particular difficulties in reading and/or spelling, for which the applicable KMK provisions allow the school to establish the need through standardised pedagogical assessment without requiring a formal psychological diagnosis. Classroom accommodations and pedagogical support may be provided on the basis of an identified functional need even where no formal diagnosis is available; these are distinguished from formal access arrangements in assessed work.

Possible measures include extra time, breaks, a quiet room, technical aids, adapted presentation, reading or writing support and alternative response formats, where these are appropriate to the documented barrier. Arithmetic difficulties are subject to the applicable KMK provisions; marks for arithmetic in mathematics and the sciences cannot be waived.

The Department SENDCo proposes the measures with the Support Teacher. They are decided in the report conference (Zeugniskonferenz), approved by the Principal, documented in the Student Profile, applied in lessons and class tests, and reviewed at least once a year.

4.7.2 Deviation from General Grading Principles for Reading and Spelling Difficulties

For persistent reading and spelling difficulties, the school may deviate from general grading principles in line with the KMK recommendations, for example by assessing work against the student's individual level of learning, giving more weight to oral work, or temporarily not grading spelling or reading, with progress described in words.

These measures apply only in primary and lower secondary education (up to Grade 10), are time-limited and gradually reduced, are recorded in the IEP, decided by the report conference and approved by the Principal. Any deviation is noted on the school report using the KMK wording (*„Aufgrund einer vorübergehenden Leistungsminderung im Bereich Lesen/Schreiben wurde bei der Bewertung der Leistungen im Fach [...] von den allgemeinen Grundsätzen der Leistungsbewertung abgewichen."*). Deviation is **not permitted** in the upper secondary phase, in final examinations, or for arithmetic in mathematics and the sciences.

4.7.3 Examination-Related Access Arrangements (KMK)

For German school-leaving examinations and centrally set tests, access arrangements must be approved by the KMK Commissioner, in line with the KMK Directive on Examination-Related Compensation for Disadvantage (11.12.2024).

Aspect	Requirement
Applies to	Erster Schulabschluss (ESA, formerly Hauptschulabschluss); Mittlerer Schulabschluss (MSA, formerly Realschulabschluss) and Zentrale Klassenarbeiten (ZKA); upper secondary phase and Abitur (DIA)
Application and decision	Parents, or students aged 18 or over, apply to the Principal. The Head of Inclusion coordinates and advises. The Principal reviews the application with the class or year-group conference and forwards it with a recommendation. The KMK Commissioner decides. The decision is kept in the student's file.
Deadlines	Secondary I: applications are normally submitted one year before the relevant examination or centrally set assessment. Abitur: applications are submitted during the introductory phase of the upper secondary school. The applicable KMK deadlines and procedures in their current version must be observed. Late applications are only possible in the circumstances permitted by the current KMK rules.
Documentation	School history and intended qualification; appropriate diagnostic evidence in German (reports in other languages are translated; for reading and spelling difficulties, a standardised German-language pedagogical assessment may be used where permitted by the KMK); support documentation (IEPs, conference decisions, parent involvement, progress); the requested measures
Currency	For KMK applications only, documentation and diagnosis should normally not be older than **two years**. Exception: permanent, medically confirmed impairments with no expected improvement. This rule does not apply to the general school-based use of reports (see 4.4).
Prior use	The measures must have been used in the two school years before the examination, including in class tests. Parents are advised at the latest one school year before the application deadline.
Limits	No change to academic requirements. Extra time up to 25 % (spelling difficulties up to 20 %, usually up to 10 % in mathematics). No exemption from grading (Notenschutz). No mention on final certificates. Only approved measures are used, and students confirm which measures they used after each examination.
Medical reports	If an impairment is confirmed by a medical report, access arrangements are to be granted. The specific measures are assessed for suitability.
Data protection	Submission only with the consent of the parents or adult student, via the KMK's secure examination platform.

4.7.4 Target-Different Education (Zieldifferente Beschulung)

Students with a special educational need in learning (Förderschwerpunkt Lernen) may be taught according to individual learning targets when the regular targets cannot be reached despite appropriate support, in line with the KMK Principles (2017):

- It requires an agreement between the Principal and the parents; without agreement, regular targets continue.
- It is based, where possible, on a special educational assessment; the individual targets are documented in the IEP, and the student remains part of the class.
- Students receive learning development reports instead of grades and move up without a promotion decision.
- From lower secondary, it is notified to the KMK Commissioner; a return to regular education requires the Commissioner's approval.
- It usually ends after Grade 9 without a German qualification and with a KMK certificate. Follow-on pathways are considered early, together with the family.

4.7.5 Subject Exemptions

An exemption from a subject, for example Arabic, is a separate process that requires approval under the relevant KHDA procedure. It is not a regular feature of any support level. Applications are prepared by the Inclusion Department together with the parents, based on the student's documented needs.

4.8 Gifted & Talented Students

Supporting particular abilities is part of DISD's inclusive approach. Students are identified through teacher or parent nominations, assessment data and external reports where available. Support includes enrichment, differentiation and curriculum compacting, acceleration in individual cases and extra-curricular opportunities, with attention to social and emotional needs. For twice-exceptional students, both areas are supported together. Measures are documented in the Student Profile.

4.9 Students Learning German as an Additional Language

Learning German as an additional language (DaF/DaZ) is not in itself a special educational need. Students learning German are supported by the school's language support team. A student can, however, learn German as an additional language and also have a special educational need. Where it is unclear whether a difficulty is language-related or a special educational need, the Inclusion Department and the language support team assess the situation together and agree on support.

4.10 Partnership with Parents and Student Voice

Parents are informed early and transparently and are involved in decisions, the Student Profile, the IEP and all reviews. Every school year, parents of students in the Inclusion Register are offered **at least three fixed meetings**: a first IEP meeting, a second IEP meeting on interim progress, and an end-of-year meeting. Additional meetings take place whenever needed, at the request of parents or the school. For students on Level 1 without an IEP, these meetings cover the Student Profile.

The Department SENDCo is the main contact for parents. Staff of the Inclusion Department respond to emails **within 48 hours on school days**. The school also offers an Inclusion Newsletter, an Inclusion

Parent Café, information events and parent coaching. A parent survey takes place twice a year, and students contribute their views to their Student Profile and IEP in an age-appropriate way.

Raising Concerns and Complaints

Parents can raise concerns at any time, first with the class teacher, Support Teacher or Department SENDCo, then with the Head of Inclusion and finally with the Principal. Concerns are acknowledged within 48 hours on school days, documented with the agreed actions and outcome, and parents are informed of the result. Formal complaints follow the school's Complaints Policy. Parents who remain dissatisfied after the school's procedure may contact the KHDA.

4.11 Collaboration with External Specialists and iLSAs

The school cooperates with external specialists and independent service providers, including speech and language therapists, occupational therapists, learning support providers and child and adolescent psychologists.

Depending on the type of support, services may take place at school under an appropriate cooperation or service framework, or families may be referred to external providers. Providers operating on school premises must meet the school's requirements relating to appropriate licensing/registration, safeguarding, insurance, confidentiality, data protection, professional qualifications and contractual responsibilities, where applicable. Administrative and contractual arrangements are coordinated through the General Manager in accordance with the school's approval structures. Detailed requirements are set out in the relevant school SOP or agreement.

External providers remain independent, and agreements and payments are generally arranged directly with parents. With parental consent, relevant information may be shared with the school to support coordinated provision.

For individually employed iLSAs, appropriate agreements define roles, responsibilities, confidentiality and cooperation with the school.

4.12 Transitions

Transitions within the school and to other schools are planned so that support continues without interruption. Each handover includes the Student Profile, IEP, end-of-year evaluation, effective strategies, access arrangements and current targets. The Department SENDCo is responsible within a phase; both Department SENDCos are responsible between phases, supported by the Head of Inclusion for complex transitions. The transition into Grade 7 includes placement in an educational pathway (see 4.5). Information is passed on to another school **only with the written consent of the parents.**

4.13 Records, Confidentiality and Data Protection

All inclusion records are kept centrally, consistently, securely and up to date. Access to the Inclusion Register, Student Profiles and related SEND documentation is role-based and limited according to the

need-to-know principle. Technical location within a shared school platform does not in itself confer access to confidential student information. General teaching information and confidential diagnostic documents are kept appropriately separated.

Document	Access
Student Profile (teaching-relevant part)	All teachers of the student, assigned LSAs and iLSAs
IEP	Department SENDCo, Support Teacher, teachers of the student, assigned LSAs and iLSAs, parents
External assessment and diagnostic reports	Head of Inclusion, responsible Department SENDCo, Principal where required
Additional plans	People involved, as decided by the Department SENDCo

Information is shared with external specialists, other schools or the KMK only with the consent of the parents or the adult student. Records are archived rather than deleted when a student leaves the Inclusion Register, in line with the school's data protection rules.

5. Resources

- **DISD:** Inclusion Concept; Inclusion Admissions & Capacity Framework with Provision Plan template; job descriptions; iLSA Handbook and Parent Information Guide; Student Profile and IEP templates; referral system
- **KHDA** (web.khda.gov.ae): the documents listed under Regulatory Framework, the parent guide "Advocating for Inclusive Education", the ISA template and the Non-Admission Notification Form
- **KMK / BLASchA:** the documents listed under Regulatory Framework; the German originals are available from the Inclusion Department

6. Sharing and Maintaining Awareness of this Policy

We will share and raise awareness of this policy via:

- ☑ **School Website**, together with the other inclusion information required by the KHDA
- ☑ **Staff Handbook** and the inclusion channel in Microsoft Teams
- ☑ **Induction** of new teachers, LSAs and iLSAs, and start-of-year briefings
- ☑ **Weekly Inclusion Consultation Hours** of the three Department SENDCos
- ☑ **Meetings with parents**, admissions consultations and written communication via e-mail
- ☑ Inclusion Newsletter, Parent Café and information events
- ☑ **Student Handbook**, in an age-appropriate form

7. Relevant Professional Development

All staff receive the training they need to meet the needs of every student. The Inclusion Department offers **regular inclusion workshops** for all teachers: one workshop in the preparation week before the start of the school year and one further workshop in each half-year. Topics are based on identified needs, for example differentiation and Universal Design for Learning, classroom accommodations and access arrangements, behaviour and regulation, and specific areas of need. In addition, the school provides:

- inclusion induction for all new teachers
- induction, classroom observations and feedback for Support Teachers, LSAs and iLSAs
- training on access arrangements, deviations from grading principles and KMK procedures, especially for examination year groups
- regular updates on KHDA requirements
- ongoing coaching through the weekly Inclusion Consultation Hours and joint case work

Where a member of staff needs additional expertise, targeted support is agreed within a set time frame.

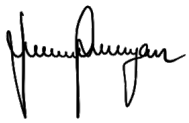
8. Monitoring the Effectiveness of the Policy

DISD evaluates the effectiveness of inclusive provision through student progress and participation data, IEP outcomes, attendance and wellbeing indicators, parent and student voice, classroom observations, review of support levels and relevant compliance checks. Findings inform the Inclusion Action Plan, professional development, resource planning and the annual review of this policy. An anonymised annual Inclusion Governance Report is presented to the Board, summarising outcomes, inclusion capacity, staffing and resource developments, and progress against the Inclusion Action Plan. The Board remains at governance and strategic level and does not participate in individual admissions decisions or case management.

The practical application of this policy will be reviewed annually by the Head of Inclusion with the Inclusion Governance Team, and whenever KHDA or KMK requirements change. A statement of the policy's effectiveness and recommendations for improvement will be presented to the Principal for endorsement (see Policy Evaluation).

9. Linked Policies

• Admissions Policy	• Safeguarding and Child Protection Policy
• Wellbeing Policy	• Behaviour Policy
• Assessment Policy	• Language Policy
• Data Protection Policy	• Complaints Policy
• Anti-Bullying Policy	

Principal:	Patricia Reisyan 	**Date:**	05.10.2026
General Manager:	Sener Erkol	**Date:**	05.10.2026

Appendix A – Glossary

Term	Definition
Access arrangements (Nachteilsausgleich)	Adjustments that compensate for a barrier without changing academic requirements
DIA	Deutsches Internationales Abitur (German International Abitur)
ESA	Erster Schulabschluss, formerly Hauptschulabschluss (end of Grade 9)
IEP	Individual Education Plan; developed for students on Levels 2 and 3
iLSA	Individual Learning Support Assistant, employed by parents
ISA	Individualised Service Agreement for additional paid services, approved by the KHDA
KMK Commissioner (KMK-B)	Representative of the KMK responsible for German examinations abroad
Learning development report (Lernentwicklungsbericht)	Written report used instead of grades in target-different education
LSA	Learning Support Assistant, employed by DISD
MSA	Mittlerer Schulabschluss, formerly Realschulabschluss (Grade 10)
Notenschutz	Exemption from grading; not permitted in KMK examinations
Provision Plan	Plan of support prepared during admission, before the decision
SENDCo	Special Educational Needs and Disabilities Coordinator
Target-different / target-equal education	Learning according to individual targets / according to the regular targets of the educational pathway
ZKA	Zentrale Klassenarbeiten (centrally set tests in Grade 10)