



# **Policy on Special Educational Needs and Learning Difficulties**

## **Academic Year 2025-2026**

## **Aims and Principles**

***St Paul's Cathedral School is a Christian, co-educational community which holds to the values of love, justice, tolerance, respect, honesty, service and trust in its life and practice, to promote positive relationships throughout the school community and where the safety, welfare and emotional well-being of each child is of the utmost importance.***

*The school aims to instil a love of learning through a broad curriculum. It aims to give each pupil the opportunity to develop intellectually, socially, personally, physically, culturally and spiritually. All pupils are encouraged to work to the best of their ability and to achieve standards of excellence in all of their endeavours.*

*Through the corporate life of the school, and through good pastoral care, the school encourages the independence of the individual as well as mutual responsibility. It aims to make its pupils aware of the wider community, espouses the democratic process and encourages a close working relationship with parents and guardians.*

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## I **Aims**

- 1.1 This is the policy on special educational needs and learning difficulties of St Paul's Cathedral School
- 1.2 The aims of this policy are as follows:
  - 1.2.1 to promote good practice in the detection and management of special educational needs (**SEN**);
  - 1.2.2 to explain the support the School can provide for children who have learning difficulties and the co-operation needed from parents;
  - 1.2.3 to actively promote the well-being of pupils;
  - 1.2.4 to create a whole school culture of openness, safety, equality and protection.

## 2 **Scope and application**

- 2.1 This policy applies to the whole School including the Early Years Foundation Stage (**EYFS**).

## 3 **Regulatory framework**

- 3.1 This policy has been prepared to meet the School's responsibilities under:
  - 3.1.1 Education (Independent School Standards) Regulations 2014;
  - 3.1.2 *National minimum standards for boarding schools* (Department for Education (**DfE**), September 2022);
  - 3.1.3 *EYFS statutory framework for group and school-based providers* (DfE, January 2024);
  - 3.1.4 Education and Skills Act 2008;
  - 3.1.5 Children Act 1989;
  - 3.1.6 Childcare Act 2006;
  - 3.1.7 Data Protection Act 2018 and UK General Data Protection Regulation (**UK GDPR**);
  - 3.1.8 Equality Act 2010;
  - 3.1.9 Children and Families Act 2014.
- 3.2 This policy has regard to the following guidance and advice:
  - 3.2.1 [Special educational needs and disability code of practice: 0 to 25 years](https://www.gov.uk/government/publications/send-code-of-practice-0-to-25) (DfE and Department of Health, April 2015)<https://www.gov.uk/government/publications/send-code-of-practice-0-to-25> (**Code of Practice**);
  - 3.2.2 [Keeping children safe in education](#) (DfE, September 2023); and
  - 3.2.3 [Equality Act 2010: advice for schools](#) (DfE, May 2014, updated June 2018).

3.3 The following School policies, procedures and resource materials are relevant to this policy:

3.3.1 Equal opportunities policy;

3.3.2 Disability policy;

3.3.3 Safeguarding and child protection policy and procedures;

3.3.4 Risk assessment policy for pupil welfare;

3.3.5 Anti-bullying policy;

3.3.6 Good Behaviour policy;

3.3.7 English as an additional language policy;

3.3.8 Admissions policy;

3.3.9 Attendance policy;

3.3.10 Relationships education / relationships and sex education policy; and

3.3.11 Accessibility plan.

#### 4 **Publication and availability**

4.1 This policy is published on the School website.

4.2 This policy is available in hard copy on request.

4.3 A copy of the policy is available for inspection from the School Office during the School day.

4.4 This policy can be made available in large print or other accessible format if required.

#### 5 **Definitions**

5.1 Where the following words or phrases are used in this policy:

5.1.1 References to the **Proprietor** are references to the Board of Governors.

5.1.2 References to **working days** mean Monday to Friday, when the School is open during term time. The dates of terms are published on the School's website.

5.1.3 References to Pupil Profiles are references to a plan or programme designed for children with SEN to help them to get the most out of their education. A Pupil Profile summarises the child's needs, builds on the curriculum that a child with learning difficulties or disabilities is following and sets out the strategies being used to meet that child's specific needs.

5.1.4 References to **Provision mapping** are references to provision maps used by the School as an efficient way of showing all the provision that the School makes which is additional to and different from that which is offered through the School's curriculum. The use of provision maps can help the Learning Support Department to maintain an overview of the programmes and

interventions used with different groups of pupils and provide a basis for monitoring the levels of intervention.

## 5.2 **"Special educational needs" and "learning difficulty"**

- 5.2.1 Children have special educational needs if they have a learning difficulty which calls for special educational provision to be made for them.
- 5.2.2 Children have a learning difficulty if they:
  - (a) have a significantly greater difficulty in learning than the majority of others of the same age; or
  - (b) have a disability which prevents or hinders the child from making use of educational facilities of a kind generally provided for children of the same age in mainstream schools or mainstream post 16 institutions (please also see the School's disability policy);
  - (c) are under five and fall within the definition at (a) or (b) above or are likely to do so do when of compulsory school age if special educational provision is not made for the child.
- 5.2.3 A child must not be regarded as having a learning difficulty solely because the language or form of language in which he or she is or will be taught is different from a language or form of language which is or has been spoken at home. However, children for whom English is an additional language will be provided with appropriate support. Please see the School's English as an additional language policy.
- 5.2.4 A child who finds a particular subject difficult does not necessarily have a "learning difficulty" in the legal sense of that expression; there will often be disparities in the speed with which children learn, in their skill at solving problems and in aptitude generally.
- 5.2.5 The expression "learning difficulty" covers a wide variety of conditions and may include those known as dyslexia, dyscalculia, dyspraxia, attention deficit (hyperactivity) disorder, semantic processing difficulty and learning problems which result from social, emotional or mental health difficulties. The expression may also include those who have problems with their eyesight or hearing or who have an autistic spectrum disorder.
- 5.2.6 Learning difficulties may affect children who have a high IQ and academic ability as well as those of lower IQ and ability. Sometimes a child's learning difficulty becomes apparent for the first time at the age of 11+ or older, when the educational pressures tend to increase.

## 6 **Responsibility statement and allocation of tasks**

- 6.1 The Governing Body has overall responsibility for all matters which are the subject of this policy.
- 6.2 To ensure the efficient discharge of its responsibilities under this policy, the Governing Body has allocated the following tasks:

<b>Task</b>	<b>Allocated to</b>	<b>When / frequency of review</b>
Keeping the policy up to date and compliant with the law and best practice	Alison Wright, Deputy Head Academic	As required, and at least termly
Day to day responsibility for carrying out individual pupil risk assessments under the policy	Kim Thomas, SENCO	As required, and at least termly
Monitoring the implementation of the policy, relevant risk assessments and any action taken in response and evaluating effectiveness	Kim Thomas, SENCO	As required, and at least termly
Seeking input from interested groups (such as pupils, staff, parents) to consider improvements to the School's processes under the policy	Kim Thomas, SENCO	As required, and at least annually
Formal annual review	Governing Body	Annually

### 6.3 The School's SENCO has responsibility for:

- 6.3.1 ensuring liaison with parents and other professionals in respect of a child's special educational needs;
- 6.3.2 advising and supporting other staff in the School;
- 6.3.3 ensuring that appropriate Pupil Profiles are in place and effectively implemented;
- 6.3.4 ensuring that relevant background information about individual children with special education needs is collected, recorded and updated;
- 6.3.5 undertaking any other appropriate duties in accordance with the Code of Practice.

## 7 Procedures

- 7.1 The School's approach to the detection and management of learning difficulties will be guided by the Code of Practice.
- 7.2 As part of the Assess-Plan-Do-Review Model and to ensure collaborative working, the School works closely with parents of children who have or may have special educational needs and learning difficulties to assess and review a pupil's needs and support. Parents are kept informed concerning assessment, planning, provision and review of their child's education.

- 7.3 Identification of pupils with a learning difficulty**
- 7.3.1 Pupil progress and engagement is monitored and if the outcome of a test or any other circumstance(s) give(s) us reason to think that a pupil may have a learning difficulty, we will report and consult with the pupil's parents as necessary and make recommendations about further assessment and support.
- 7.4 Formal assessment**
- 7.4.1 If there are indications that a pupil may have a learning difficulty, we will ask the pupil's parents to agree to the pupil being formally assessed by an educational psychologist or appropriate professional where appropriate.
- 7.4.2 The parents may consult an educational psychologist or appropriate external professional suggested by the School, or one of their own choice. The cost in either case must be borne by the parents.
- 7.5 The School will endeavour to follow any recommendations from that assessment, subject to agreement as to any additional fees payable.
- 7.6 Learning support**
- 7.6.1 As part of a graduated approach, the School may suggest a course of additional specialist teaching by a qualified specialist on a one-to-one or small group basis in school.
- 7.6.2 If there are indications that a pupil may have a learning difficulty but the circumstances are not such as to indicate an immediate formal assessment or a course of additional specialist teaching is required, the School may suggest that the pupil gives up one of the normal curriculum subjects and instead attends a small learning support group which will concentrate on developing skills such as phonics, spelling, maths and handwriting.
- 7.6.3 Learning support of this kind will be arranged, subject to prior agreement being reached with the parent as to the charging arrangement for this.
- 7.6.4 The pupil's progress and needs will be monitored and, if necessary, the School will recommend a formal assessment if the learning support does not appear to be meeting the pupil's needs or where it is required for the purposes of applying for exam access arrangements (see 7.8)
- 7.7 External teaching**
- 7.7.1 Parents may opt for additional specialist teaching outside the School, provided that the Head is satisfied with your child's safety and travel arrangements and also that the additional specialist teaching is at times which fit in with the remainder of the curriculum, timetable and community life of the School.
- 7.7.2 The school is occasionally able to recommend professional specialists (e.g. an autism behaviour specialist) who can conduct sessions at the school, contracted by the parents, with the agreement of the Head.



- 7.7.3 Where specialist teaching is external to the school, communication between the SENCO, and the specialist teacher is required in order to ensure a cohesive approach.

## **7.8 Examinations**

- 7.8.1 Pupils who have been diagnosed as having a learning difficulty may be eligible for extra time and / or other "access arrangements" to complete internal examinations and public examinations. This also applies to external specialist examinations e.g. music examinations conducted in School; the SENCO liaises with the Music Administrator to provide required documentation.
- 7.8.2 Parents are asked to liaise with the SENCO in good time with respect to this.

## **7.9 Information sharing and parent involvement**

- 7.9.1 New parents are asked to complete a parent questionnaire to gather key background information which may be relevant and to provide copies of any report or recommendations which have been made in relation to special educational needs at their child's previous school or elsewhere within the last 12 months. Confidential information of this kind will only be shared within the School on a "need to know" basis.
- 7.9.2 The School will do all that is reasonable to report and consult with parents about their child's learning difficulties and to ensure that teachers are given any necessary information about a child's learning difficulties and that teaching practices are appropriate.
- 7.9.3 Parents should notify the School immediately if their child's progress or behaviour causes concern so that the School can devise and agree a strategy with the parents.
- 7.9.4 Parents bear the overall responsibility for taking decisions about the management of their child's learning difficulties. A parent who would prefer to have a formal assessment instead of learning support should make arrangements accordingly with the School or outside, as appropriate. In these circumstances parents must ensure that the School and the SENCO is given copies of all advice and reports received.
- 7.9.5 The School regularly provides short-term, in-group booster support under the direction of the class teacher for individual or small groups across the range of subjects for short periods as part of standard classroom practice. Pre-teaching of subjects is offered where this may benefit an individual or small group. Support is offered where additional practice may be beneficial on a short-term basis. Advice is sought by the class teacher from the SENCO as required but these informal interventions are not designated as learning support and would not routinely be communicated to parents. Monitoring of such in-class support by the class teacher may lead to the recommendation for learning support or monitoring by the Learning Support team.

## **7.10 Pupil Profile Plans**

- 7.10.1 The SENCO will ensure that an appropriate Pupil Profile is in place where required.

- 7.10.2 The Pupil Profile will be prepared in consultation with the parents and, if appropriate, the pupil can include: strategies to support a pupil, key information for staff and pupil voice.
- 7.10.3 In carrying out the review, the SENCO will consider:
- (a) the effectiveness of the support and interventions and their impact on the pupil's progress;
  - (b) the views of relevant teaching staff, the parents and, if appropriate, the pupil; and
  - (c) any changes that are required to the support and outcomes set out for the pupil.

## **8 Education health and care plans (EHC plan)**

- 8.1 Parents and the School have the right under section 36(1) of the Children and Families Act 2014 to ask the local authority to make an assessment with a view to drawing up an EHC plan. The School will always consult with parents before exercising this right. If the local authority refuses to make an assessment, the parents (but not the School) have a right of appeal to the First-tier Tribunal (Special Educational Needs and Disability).
- 8.2 Where a prospective pupil has an EHC plan, the School will consult the parents and, where appropriate, the local authority to ensure that the provision specified in the EHC plan can be delivered by the School. The School will co-operate with the local authority to ensure that relevant reviews of EHC plans are carried out as required.
- 8.3 Any additional services that are needed to meet the requirements of the EHC plan will be charged to the local authority if the authority is responsible for the fees and our school is named in Section I of the EHC plan. In all other circumstances the school will agree the charging arrangements with the parent(s) with regard to the provisions of the Equality Act 2010, where applicable.

## **9 Additional welfare needs**

- 9.1 The School recognises that pupils with special educational needs or learning difficulties may be at risk of being bullied. The School's anti-bullying policy] makes it clear that bullying behaviour of any kind is not acceptable and will be taken very seriously.
- 9.2 The School will tackle inappropriate attitudes and practices, and promote positive attitudes, through staff leading by example, through the personal, social, health and economic (PSHE), relationships education / relationships and sex education programmes, through the supportive School culture and through the School's policies.
- 9.3 When teaching pupils about safeguarding, the School recognises that a one size fits all approach may not be appropriate for all pupils and will consider whether it should adopt a more contextualised approach for some pupils with special educational needs or disabilities.
- 9.4 If parents are concerned about their child's welfare they can approach the pupil's form teacher or any senior member of staff to discuss their concerns in private at any time.

- 9.5 Additional barriers can exist when detecting the abuse or neglect of pupils with a special educational need, disability or certain medical or physical health condition that can create additional safeguarding challenges both online and offline for those involved in safeguarding and promoting the welfare of this group of children. The School is mindful in particular that these may include:
- 9.5.1 assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the pupil's condition without further exploration;
  - 9.5.2 pupils with a special education need, disability or certain health conditions may be more prone to peer group isolation and can be disproportionately impacted by bullying (including prejudice-based and discriminatory bullying) without outwardly showing any signs;
  - 9.5.3 some pupils may be unable to understand the difference between fact and fiction in online content and can repeat the content / behaviour in school without understanding the consequences; and
  - 9.5.4 there may be communication barriers which are difficult to overcome to identify whether action under this policy is required.
- 9.6 The School should consider providing extra pastoral support and attention for these pupils, along with ensuring any appropriate support for communication is in place.
- 9.7 Any report of abuse involving children with SEND will require close liaison with the designated safeguarding lead (or deputy) and the SENCO.
- 9.8 Any safeguarding concerns will be dealt with in accordance with the procedures set out in the School's child protection and safeguarding policy and procedures.
- 9.9 **Disability**
- 9.10 The School recognises that some pupils with special educational needs or learning difficulties may also have a disability. Pupils and parents are referred to the School's disability policy.
- 9.11 The School will make all reasonable adjustments in order to afford opportunity to disabled pupils. However if, despite such adjustments, the School is unable to provide adequately for the pupil's needs, the School may decline to offer a place to a pupil or request that parents withdraw their child from the School (see 10 below).

## **10 Alternative arrangements**

- 10.1 We reserve the right, following consultation with you, to ask or require you to withdraw your child from the School if:
- 10.1.1 your child is in need of a formal assessment, additional specialist teaching, learning support or medication to which you do not consent; and / or
  - 10.1.2 you have deliberately withheld from the School information which prevents it from effectively addressing your child's learning difficulties;
  - 10.1.3 your child's learning difficulties require a level of support or medication which, in the professional judgment of the Head, the School is unable to provide, manage or arrange;

- 10.1.4 your child has special educational needs that make it unlikely that he or she will be able to benefit sufficiently from the mainstream education and facilities which we provide.
- 10.2 In any of these circumstances we will do what is reasonable to help you to find an alternative placement which will provide your child with the necessary level of teaching and support.
- 10.3 Withdrawal of a pupil in these circumstances will not incur a charge to fees in lieu of notice. The deposit paid in respect of your child will be credited to your account.

## **11 Training**

- 11.1 The School ensures that regular guidance and training is arranged on induction and at regular intervals thereafter so that staff and volunteers understand what is expected of them by this policy and have the necessary knowledge and skills to carry out their roles.
- 11.2 The level and frequency of training depends on role of the individual member of staff.
- 11.3 The School maintains written records of all staff training.

## **12 Risk assessment**

- 12.1 Where a concern about a pupil's welfare is identified, the risks to that pupil's welfare will be assessed and appropriate action will be taken to reduce the risks identified.
- 12.2 The format of risk assessment may vary and may be included as part of the School's overall response to a welfare issue, including the use of individual pupil welfare plans (such as behaviour, healthcare and education plans, as appropriate). Regardless of the form used, the School's approach to promoting pupil welfare will be systematic and pupil focused. Please see clause 6.2 for details of the individuals with responsibility for carrying out, monitoring, implementing and reviewing the effectiveness of risk assessments under this policy.

## **13 Record keeping**

- 13.1 All records created in accordance with this policy are managed in accordance with the School's policies that apply to the retention and destruction of records.
- 13.2 The information created in connection with this policy may contain personal data. The School's use of this personal data will be in accordance with data protection law. The School has published on its website privacy notices which explain how the School will use personal data.

## **14 Staff**

SENCO	Kim Thomas – <a href="mailto:kthomas@spcs.london.sch.uk">kthomas@spcs.london.sch.uk</a>
Learning Support Teacher	Clare Gulley
Learning Support Teacher	Timea Toth
School counsellor	Andrea Obholzer
Dyslexia teacher	Zoe Solanki

