Response ID ANON-J8MQ-6STJ-7

Submitted to School attendance: Improving consistency of support
Submitted on 2022-02-28 16:54:28

Introduction

Would you like us to keep your responses confidential?

No

Reason for confidentiality:

Which of the categories below best describes you?

Other organisation or representative body - please state in the box below

If you selected other organisation or representative body, please state the type e.g. a union or a charity with an interest in school attendance:

Community Interest Company - Parent Led

What is the name of your organisation (if applicable)?

Organisation/school name:
National Network of Parent Carer Forums (NNPCF)

Which local authority are you or your organisation/school based in ?

Please select:

About this consultation

Proposal 1: Requiring schools to have an attendance policy, and have regard to statutory guidance on the expectations of schools, academy trusts and governing bodies of maintained schools on attendance management and improvement.

1 Do you agree that all schools should be required to publish an attendance policy? As outlined in the proposal link above.

Somewhat agree

If you wish to, please explain why in no more than 200 words:

The NNPCF agree to the DfE's proposals. However, on their own, they seem unlikely to have a big impact on absence rates for children and young people with SEND.

The lived experiences of our members illustrates that for SEND pupils who miss the most school tend to have the most complex reasons for doing so; better early intervention and more targeted support to meet individual pupils'
and families' needs would help to reduce absence for many children and young people with SEND.

There is a need for cultural change in schools where inclusion and diversity are valued by ALL. This should be reflected through attendance, behaviour, SEND and Medical Needs policies that are coproduced with children, young people, and their parents/carers.

2 Are the proposed principles to be covered in school policies (outlined in the proposal link above) sufficient to improve the consistency of attendance support that pupils and parents receive?

Somewhat sufficient

If you wish to, please explain why in no more than 200 words:

Schools should consider how a whole-school approach can meet the needs of all pupils in the school, including pupils with SEN or a disability so that everyone can feel they belong in the school community.

However, for children and young people with special educational needs and/or disabilities it should be about aspiration not expectation. As parent carers we have aspirations for our children to attend, if they are well enough, but this should not be an expectation if they are unwell or struggling with their mental health and wellbeing as a result of their needs.

There is a risk that expectations will lead to a focus on figures as opposed to individual analysis and support required; the change in 'hearts and minds' that can increase attendance of children and young people with SEND.

The language used ties in with behaviour consultation which is also heavy on sanctions rather than focusing on analysis and reasonable adjustments to

the school environment.

Each child or young person has unique needs and family circumstances will vary; parents of children with SEND need support not punishment.

Poor attendance for children and young people with SEND is not just a school's responsibility – needs social care and health (including mental health) engagement.

3 Do you agree that minimum attendance management expectations should be set for academy trusts and governing bodies of maintained schools? As outlined in the proposal link above.

Somewhat agree

If you wish to, please explain why in no more than 200 words:

In coproduction with parents, carers and pupils like SEN Information reports.

4 Are the proposed expectations for academy trusts and governing bodies of maintained schools (outlined in the proposal link above) sufficient to improve the consistency of attendance support and challenge schools receive?

Somewhat sufficient

If you wish to, please explain why in no more than 200 words:

Our members have told us that the reality is that SEND families often face 'escalation ladder' to punitive measures. Families feel disillusioned and become disengaged – based upon years of not being listened to and believed. This leads to poorer outcomes rather than helping children get back into school.

These proposals must link to wider Government legislation, policy and funding constraints e.g., School's White Paper, SEND Review, Care Review – enshrine culture of listen, understand and support NOT punish. For example, the Care Review reports that families who need support (CIN) are automatically translated into children who need protection (CP). This is because too often the c/yp and their family don't qualify for Children with Disabilities support so safeguarding teams become involve.

Proposal 2: Introducing statutory guidance on the expectations of local authority attendance services.

5 Do you agree that a minimum set of components for LA attendance services should be set? As outlined in the proposal link above.

Somewhat agree

If you wish to, please explain why in no more than 200 words:

There needs to be a consistent approach across local authority areas to avoid a postcode lottery.

Many SEN Advisory support services been diminished; the NNPCF have concerns about the role of the LA in improving attendance for children and young people with SEND and how they will resource this.

6 Are the proposed components for LA attendance services (outlined in the proposal link above) sufficient to improve the consistency of attendance support which pupils, parents and schools receive?

Somewhat sufficient

If you wish to, please explain why in no more than 200 words:

Poor attendance is not just a LA's responsibility – schools, social care and health (including mental health) need to work in partnership and engage with families and the child/young person to address poor attendance at an individual and strategic level.

Proposal 3: A clearer more consistent national framework for the use of attendance legal intervention, including a new regulatory framework for issuing fixed penalty notices for absence.

7 Do you agree that a national framework for the use of attendance legal intervention, including a new regulatory framework for issuing fixed penalty notices for absence should be set? As outlined in the proposal link above.

Somewhat disagree

If you wish to, please explain why in no more than 200 words:

SEND Families are fatigued. CFA2014 failed to deliver, awaiting SEND Review. Disproportionately impacted by the pandemic YET are being asked to support these proposed changes. Need to rebuild confidence and trust in the system.

Safeguarding is NOT just an attendance issue. Care Review has highlighted that disabled children (CIN) are not able to access the social care support they may need due to high thresholds/insufficient funding.

Each child or young person has unique needs and family circumstances will vary; parents of children with SEND need support not punishment. Fixed penalty notices (and other sanctions) must only be used appropriately as part of the suite of wider of measures.

8 Are the proposed areas for inclusion in the new regulatory framework for fixed penalty notices (outlined in the proposal link above) sufficient to improve the consistency of them being issued?

Somewhat insufficient

If you wish to, please explain why in no more than 200 words:

There is very little on SEN and disability.

The main focus is on escalation rather than prevention/support in the consultation. This needs to be embedded in both principles and the new regulatory framework (practice), and all reasonable adjustment duties explored.

Schools and LAs need to listen and support, working with individual SEND pupils and their families to understand the root of the problem.

Proposal 4: Bringing the rules for granting leaves of absence in academies in line with other state funded schools.

9 Do you agree there should be consistency in the rules around granting leaves of absence across all state funded schools? As outlined in the proposal link above.

Strongly agree

If you wish to, please explain why in no more than 200 words:

Public Sector Equality Duty

10 What do you consider to be the equalities impacts of the proposals on protected characteristics (mentioned above)?

Please answer in no more than 200 words:

There is very little focus on SEN and disability in the proposals.

Some attendance issues are more likely to arise due to specific SEN or disabilities. There is a need for the school environment to adapt rather than the individual child. Schools/LAs need to understand the causes of poor attendance for pupils with SEND use reasonable adjustments.

For example:

1. Children miss out on incentives i.e. attendance treats, despite attendance not being within their control at times (attending appointments, series of treatments).
2. Flexi- schooling approach: some neurodiverse pupils did better at home so need to be flexible to support learners – hybrid and blended offers are important but schools need to mindful of need and ensure it supports the learners
3. For some pupils without access to some learning from home, anxiety about the return to school may increase resulting emotionally based school avoidance.
4. Our members have told us that reasonable adjustments are not being applied to the process of supporting attendance. Sometimes the reasonable adjustments need to be applied to SEN Transport or travel assistant arrangements.

There is no reference to Equality Act in these proposals. This affects all protected characteristics not just disabled children and young people.

Families with children with SEND are likely to be disadvantaged because they are likely to be from disadvantaged communities and/or will struggle to pay attendance fines due to the household income being reduced as a result of their child's additional needs.