Response ID ANON-EXGA-GCYM-N

Submitted to SEND Review: Right support, right place, right time
Submitted on 2022-07-22 07:25:13

Introduction

Who is this for?

Instructions

About you

a) Welcome - what is your name?

Name:
Kay Moore

b) Would you like to provide your email address?

Email:
consultation@nnpcf.org.uk

c) Are you happy for the Department for Education to use your email address to contact you to clarify points in your response, if necessary?

Yes

d) Would you like us to keep your responses confidential?

No

Reason for confidentiality:

e) Can we publish your response?

Yes, publish my response

f) Which of the following best describes the capacity in which you are responding to this consultation?

A parent/carer

If Other, please give details:

g) What is your role within your organisation?

What is your role within your organisation:
Consultation & Policy Lead

Not Answered

h) What is the name of your organisation?

Organisation Name:
National Network of Parent Carer Forums

Not Answered

Chapter 2: A single national SEND and alternative provision system

1 What key factors should be considered, when developing national standards to ensure they deliver improved outcomes and experiences for children and young people with SEND and their families? This includes how this applies across education, health and care in a 0-25 system.

Q1:

90% of parent carers who responded to our survey said that there should be national standards for SEND services.

85-94% of parent carers said that the national standards should apply across Education, Health and Social Care.

68% of parent carers said that they should apply to universal services, 60.62% targeted services and 55.59% said that they should apply to specialist

services. This suggests that parents and carers would like to see a greater focus on early intervention and prevention through a graduated approach at SEN Support level.
This is reinforced by 83% of parents and carers who said that there should be a national standard for what the Local Offer should deliver. It is concerning that over 8% of parents who replied to this question (many of whose children will have an EHC plan did not know what the Local Offer is).

88% of respondents said that the standards should a include a list of reasonable adjustments. For the purpose of our survey a 'Reasonable Adjustment' was defined as a change that must be made to remove or reduce a disadvantage if a person has a disability, to make things fairer to everyone.

Parent Carers also said that the national standards should include:

Maximum waiting times for services (90.66%) including:
• Assessments and delivery of services/support
• Maximum waiting times between appointments.

Coproduction with families and representative groups (95.28%)

For the purpose of this survey coproduction is defined as an equal and reciprocal partnership where everyone's experience, knowledge and skills are used to create better outcomes.

• National standards for coproduction with families – at an individual and strategic level including timescale guidance for responding to families during the EHCNA. What happens if timescales are not met? Link to accountability, enforcement and redress.
• National definition of Coproduction within SEND
• Parents said they are not currently being listened to when they have concerns about their child's development, progress or behaviour
• There should be a parent body (experts by experience) who are involved in assessing whether standards have been met at a local level
• National standards should be coproduced with parents and grass roots practitioners across E, H & C.

SEN Support
• Ordinarily available provision that includes standards for education settings on the support they are required to give around a CYP's communication skills, physical development, sensory needs, emotional wellbeing, independence/daily living skills to prevent over reliance on specialist services – this needs to be differentiated against different ages/stages from birth 0-25 and need
• Clarity regarding what mainstream schools must provide from notional funding and an accessible escalation process to raise concerns if this is not being delivered
• The CoP is currently very vague regarding SEN Support and is open to interpretation in education settings. There must be greater clarity of what SEN support is and who should be on the SEN register
• There could be peer reviews on Quality Assurance around inclusion and Ordinarily Available Provision (OAP).
• The SEN Support offer must be person centred rather than a set menu of support
• Pathways and criteria at SEND Support level must be clear; early identification and intervention will reduce the requests for EHC Needs assessment as gateway to services.
• SEN Support MUST be placed upon a statutory footing; SEN Support plans to set out needs, provision and outcomes.

Training
• A structured approach to planning and developing skills within the entire SEND workforce (education, health and social care) and families with different levels depending on their work/contact with CYP/families with SEND. This should be mandatory and updated regularly (use of the levelled approach that NHSE and Council for Disabled Children are developing for health services)
• There must be mandatory SEND training (similar to Safeguarding) for those who are in leadership roles
• A national knowledge and skills framework (and mandatory qualification) for EHCP coordinators to ensure knowledge of SEND System, understanding of multiagency working and how to engage with families
• To deliver high quality of standards, training will need to be put in place to make judgments at a local level overseen by Ofsted.

Health specific
• Standards for how health services are delivered (i.e. best practice models) in education settings 0-25 and should include therapies (OT, Physio, Speech and Language Therapy – SaLT), nursing standards and Mental Health and Wellbeing services
• Statutory guidance for ICBs in terms of how they execute their SEND responsibilities.

Social Care specific
• Standards must involve clarity around the social care role as this is still inconsistent especially in relation to their contribution to EHCNA
• It should be mandatory for all CYP to have access to a proportional social care assessment/review as part of the EHCNA process
• There should be national standards specifically for CLA/LC/YOS with SEND.

Improved quality and accountability

• Accountability is a key theme that is raised through our survey with 142 comments.

'Adequate funding must be provided to the school budgets and Schools should be held to account and obliged to follow the recommendations of the highly qualified professional assessors. NOT disregard them on budget or staffing grounds or because a "one size fits all" approach is easier to manage. It is simply not possible for SEND pupils to "get over it" but it is often possible for them to integrate and thrive in main stream schools with adequate provision made for their disability or needs.'

‘No-one is held accountable for their misjudgements and lack of service. This needs to change.’

‘For the LA to actually follow the SEND code of practice. They don't meet deadlines, children and families are left in limbo and no-one is held accountable for their misjudgements and lack of service.’

‘Make the laws and policies that are in place enforceable and ensure there is accountability when LAs and / or schools fail in their duties or fail to adhere to SEND policies / Tribunal rulings.’

• There needs to be greater accountability across the SEND system.
• Our parent carers have told us that improved quality in the system would include:

‘Consistency in the quality of knowledge and understanding regarding SEND across various Services.’

‘Quality first teaching’

‘Equality’

Better post 16 options and provision.

Our members have told us that the standards need to national and ‘high’ not minimum. ‘There should be no race to the bottom.’ The NNPCF welcomes the language used by DfE which describes the standards as National not Minimum.

The standards need to be person-centred and needs led.

The national standards need to remove the postcode lottery.

Some concerns were also raised regarding the introduction of national standards:

• Local Areas must follow National standards. How will the DfE ensure that the standards are enforced?
• The current legal framework lays down the ‘minimum standards’ for identifying, assessing and meeting need. THIS MUST NOT BE DILUTED. The standards need to focus HOW the support is delivered and enforced. A Quality Mark to demonstrate what good services look like.
• The standards must allow for flexibility with the CYP at the centre

The NNPCF would like to see a statutory framework for Early Help for SEND with appropriate levels of funding to deliver and embed this.

2 How should we develop the proposal for new local SEND partnerships to oversee the effective development of local inclusion plans whilst avoiding placing unnecessary burdens or duplicating current partnerships?

Q10:

• Parent/carer representation should be mandated. Representation should include the DfE PCF.
• The role of the voice of young person within SEND Partnerships at a local level needs to be outlined and mandated – it is also noted that within the plans for the national board there is no mention of YP!
• The Guidance for the Integrated Care Systems and links with Local SEND Boards needs to be very clear
• Consideration to be given to the wider challenge of how local area partnerships include those education settings that are ‘not on the same page/do not come to the table’ – how can membership be encouraged/enforced?
• There must be a strengthening of representation of 18-25 on the SEND partnerships
• The National standards should form the template for what local SEND partnerships should provide through the development and implementation of local inclusion plans. By clearly laying out the responsibilities of education (including schools) health and care, national standards form the framework for local planning, commissioning and service delivery.
• The responsibility of the local SEND Partnerships should be set out in the National standards.
• The format of local inclusion plans should reflect the National standards.

3 What factors would enable local authorities to successfully commission provision for low-incidence high-cost need, and further education, across local authority boundaries?

Q3:

• Coproduction between partners across education, health and care as well as across local area boundaries.
• A clear framework and alignment of powers, responsibilities, funding and accountability between a complex service delivery framework must be established for SEND across local authorities, multi-academy trusts, schools, social care providers, ICBs and health providers.
• Improved regional SEND Networks to support commissioning at a regional/sub regional level
• Change in ethos – partnership approach rather than silo working

4 What components of the EHCP should we consider reviewing or amending as we move to a standardised and digitised version?

Q4:

We asked our members what needs to change about EHC Plans. There was strong support (70.12%) for clear definitions of key words (e.g. need, provision and outcomes). Families (77.28%) would like to see clear standards regarding communication of key decisions (i.e. at each stage of the EHC Needs Assessment and Annual Review processes).

There was only modest or limited support for standardisation beyond this:

57.86% would like to see the introduction of a single national template.

56.46% would like EHC needs assessments and annual review reports to follow a standard template (regardless of whether they are education, health or social care reports). This would improve quality and consistency.

48.40% were in favour of the plans going online/digitalisation

Accessibility was a key concern with 93.49% would like to see EHC Plans be accessible to all e.g. available online or in a paper format if required, Easy Read and different languages.

There was low support for combining education, health and care in one section (instead of 3 separate sections) and only including specified and quantified provision.

EHC needs assessments and annual review reports should follow a standard template (regardless of whether they are education, health or social care reports).

National template considerations:
• Majority of those asked agreed there should be a consistent national EHC template but there does need the flexibility to adapt to individual needs; the template should be accompanied with strong guidance and training on how to complete
• The template should enable outcomes to be holistic and be set out in a way that enables provision across Education, Health and Care to work towards them and not linked to Education, Health and Care outcomes specifically. Template should allow outcomes to be written holistically and allow provision in different areas to feed into the same outcome
• Restrict/make clear recommendation of the number of outcomes (6-8) and ensure they are focused around Preparing for Adulthood (PfA) pathways from birth
• Social care needs/provision should reflect all social needs e.g. community participation and friends/relationships/independence and not just what statutory provision can provide
• Health care needs/provision should reflect all social needs e.g. balanced diet, access to regular exercise, mental health and wellbeing and not just what statutory provision can provide
• There should be national guidance on what should be included with regards to statutory social care (especially around personal/child protection information)
• Reinforce the use of a common language that can be understood by all stakeholders including the minimum use of acronyms
• Quality of assessment advice, and EHC plans
• Improved accountability when provision is not delivered

Digitalisation considerations
• GDPR – keeping data safe
• Digital poverty
• Accessibility i.e. rural communities

EHC Process
• Social care assessments should be carried out for all CYP with an EHCP. Where one does not exist, the social care assessment should be initiated as standard
• Further clarity about what 'medical advice' actually means. Who can provide it.
• Better guidance on processes of requesting advice and who to request advice from – there is currently a huge discrepancy in the quality of advice which needs to be more consistent – how will quality be measured?
• There needs to be greater transparency regarding panels and decision-making process – increased multiagency representation on panels, including parent representatives
• The NNPCF welcomes the consultation on timescales for amending an EHC plan following the annual review. There needs to be greater clarity around what the law actually says with regards to when plans should be amended following an annual review, including at key transition points.

Annual reviews
• Any national template must include a national template for Annual Reviews which needs a section for recording progress against outcomes
• Standards for annual reviews should include how to work with health professionals to enable meaningful contributions.
• Clear guidance on when plans should be amended i.e. what constitutes a significant change in need/provision?
• Stronger guidance as to how to align/use other health assessments such as continuing care assessments and CLA health assessments into and EHC needs assessments.

Our members have significant concerns about the quality of EHCPs and how they are delivered/enforced. They also have concerns regarding the inability

of local authorities to meet the timescales for statutory assessments. All agencies need to be involved. Currently the EHCPs are very education led with minimal input from Health and Social Care.

The NNPCF would like to see the EHC Needs Assessment and Plan simplified so that it is accessible to all. There needs to be training across education, health and care so that everyone understands what the EHC Plan is for and to address the quality of advice submitted.

5 How can parents and local authorities most effectively work together to produce a tailored list of placements that is appropriate for their child, and gives parents confidence in the EHCP process?

Q5:

Only 20.34% of parent carers said that they agreed that children with an EHC Plan should be able to pick a school/setting from a tailored list in their local area.

In contrast 72.61% said that parent carers and young people should be able to pick any setting that they think is right for them.

86.84% think that children with an EHC Plan should be able to choose a school/setting that is not on that list.

The NNPCF acknowledges that the aim of a more bespoke list of schools is to help families to understand the provision that is available in the Local Area that is appropriate to meet their child's needs and this may help the family to make a more informed choice. There is some support for this approach from our members, however, the list should be used as a conversation starter rather 'here is a list pick one'.

Families told us that if there is a list, they would have confidence in a list that is coproduced with the family and young person to meet their needs (60.86%) or coproduced by the Local Authority and local parent carer and community groups (e.g. parent carer forums) (49.11%). There needs to be a conversation with the family about their child's needs, what settings are available locally and how they can meet needs.

Local Offers has an important role to play here. If all Local Offers were fit for purpose and used by families the list may not be required.

Families are concerned that the primary driver is cost NOT meeting the child/young person's needs.

'The issue is not the numbers of schools to choose from but can they meet needs'

'Parents now their child better than anyone. They should be given the credibility they deserve when choosing the right provision for their child.'

There needs to be further clarity as to how the lists will be pulled together – will it be done through primary need? Who decides what schools are offered on the list? Who maintains and updates the lists?
• If it is on 'need' level, local areas should work with their parent groups/PCF to agree the list (this should be reviewed on an annual basis)
• The issue is still the limitation of choice due to lack of appropriate places
• There must be a consistent and clear local area process for placements - professionals across Education, Health & Care (& Voluntary sector) need to be aware of what that process is so that when they come into contact with families, everybody is giving consistent messages.
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The NNPCF would like to see a national standard around placements which is needs led. Independent advice is needed when choosing an education setting. Parents need to feel informed and empowered to make the right decisions for their child. IAS services MUST be appropriately to meet the increasing demand for their services. The key is that the choice of school must be coproduced with a family (i.e. a conversation based on needs and families not asked to chose from a predetermined list)

6 To what extent do you agree or disagree with our overall approach to strengthen redress, including through national standards and mandatory mediation?

Strongly agree

Q15:

We asked parent carers 'If there is a dispute about an EHC Plan, do you think that the local authority and family should have mediation to resolve any problems before going to tribunal? (Mediation means talking through the issues with an independent person and helping everyone to come to a joint decision).'

There was strong support for mediation with 71.87% of parent carers who responded said 'yes'.

• Families need access to independent support so that they are on a level playing field
• The mediator must be independent and must be trusted by all parties to be impartial
• A quick and transparent mediation process will build trust and confidence.
• Some concern that mandatory mediation is just a delaying tactic . Mandatory mediation should not delay the right of a family to access a tribunal
• Health decisions must be clinically led

However, only 46.48% of parent carers who responded said that mediation should be binding i.e. whatever is agreed at mediation be tried before going to tribunal. This would suggest a lack of trust and confidence in the current system. Parent carers still want the option of Tribunal if mediation is not successful. Some parents said that mediation should only be binding if all parties agree.

Our members strongly told us that the SEND Tribunal should have the power to make binding judgements across Education, Health, Social Care and education settings (76%-94%).

83.40% of members said that the SEND Tribunal should have additional powers to make schools/settings do what the tribunal is telling them to do.

Mediation should not be used to delay access to the Tribunal or restrict the right to go to Tribunal should things not work out.

Some of our members struggled with the concept of how mediation (which suggests two or more parties coming together to resolve a dispute voluntarily) can then be mandatory. Further clarification is required here.

The NNPCF would like to see the mediation and appeal process to the Tribunal to run in parallel so that families do not have to wait for their child's case to be heard and resolved. Families should have access to support through the mediation process if needed and the mediator must be demonstrably independent.

7 Do you consider the current remedies available to the SEND Tribunal for disabled children who have been discriminated against by schools effective in putting children and young people's education back on track? Please give a reason for your answer with examples, if possible.

Q16:

Parent carers are not necessarily aware the tribunal process can be used to hold schools/settings to account in cases of discrimination.

The NNPCF would like to see the Tribunal have powers over schools/settings to comply in cases of discrimination. Local Authorities need additional powers to hold schools/education settings to account particularly in light of the Schools White paper which requires all schools to be part of a strong multi-academy trust by 2030.

Chapter 3: Excellent provision from early years to adulthood

8 What steps should be taken to strengthen early years practice with regard to conducting the two-year-old progress check and integration with the Healthy Child Programme review?

Q8:

• In person checks not surveys to identify whether key milestones are being met.
• Holistic approach.
• Checks need to be done in good time. (Link to National Standards). Early identification and intervention are key.
• 0-5 multi-agency programmes/approach
• Seamless transition to school. Often a disparity between pre-school and school assessments.
• Coproduction with families
• Training for Early Year sector

'Early intervention would have changed my daughter's outcomes. She had signs of autism at a young age, before starting school, but no one wanted to investigate. They just dealt with the symptoms, speech and language, toileting, learning difficulties. When she was diagnosed, the school were not accepting. By the time she fell apart in year 7, it was too late. She's at the end of year 9 and in a learning pod doing less than two hours a day when I can get her in.'

9 To what extent do you agree or disagree that we should introduce a new mandatory SENCo NPQ to replace the NASENCo?

Strongly agree

Q18:

93.34% of respondents to our survey said that all SENCOs must undergo training and gain a qualification before they can do this role.

The NNPCF welcomes the proposal to introduce a new mandatory SENCo NPQ to replace the NASENCo. However, it is unclear if SENCO training will apply to FE Colleges and specialist schools and the NNPCF would request further clarity.

The NNPCF would like the SENCO training to:
• Include a focus around health and social care needs, services and provision for CYP with SEND. This will ensure that SENCOs have a good holistic understanding of the child/young person and the importance/impact of health and care needs as well as education.
• Whole staff training should be mandatory for all staff annually in the same way as safeguarding
• Training should not just be 'one off' but mandatory annual SEND refresher courses attended by the SENCO and other key staff within the school.

10 To what extent do you agree or disagree that we should strengthen the mandatory SENCo training requirement by requiring that headteachers must be satisfied that the SENCo is in the process of obtaining the relevant qualification when taking on the role?

Not Answered

Q19:

Agreed. See question 9.

• It is essential that Head Teachers are satisfied that SENCos are in the process of obtaining the relevant qualification for the role although other experience should be considered
• It would have a greater impact if it was mandatory that SENCOs are part of the Senior Leadership Team within a school although there needs to be reflective of a SEND culture rather than a tick box exercise
• All school leaders/Head Teachers/Leaders within the SEND system (across health and social care) should also be required to have knowledge, skills and expertise in SEND. This will ensure that education settings are good inclusive practices with SEND provision given a strong focus within school vision and priorities, and included in development and improvement plans.
• The SLT within a school should be accountable for making sure that the SEND policy is embedded throughout the school and not just the responsibility of the SENCO.
• Training is essential but also is a supportive SMT and teaching staff. Refresher and updated training should also be part of CPD and should be a whole school approach.

97.31% of parent carers who completed our survey think teaching staff need more SEND training to understand and support the children they teach.

Parents have told us that everyone in schools/settings needs to have extra training to help, understand and support children/young people with SEND from receptionists and caretakers to headteachers and governors.

89.93% of parent carers who responded to our survey said that a member of the school leadership team should have specific responsibility for SEND.

'Training for all staff in school so they may better understand each child's individual needs.'

Considerations

The role of the SENCO is not embedded within special schools, Further Education or the Independent sector. Further clarification is needed as to what qualifications individuals in these setting will require.

The NNPCF would like to see a member of the school leadership team should have specific responsibility for SEND. There needs to be better support for SEND leaders in mainstream schools.

11 To what extent do you agree or disagree that both specialist and mixed MATs should be allowed to coexist in the fully trust-led future? This would allow current local authority maintained special schools and alternative provision settings to join either type of MAT.

Neither agree nor disagree

Q20:

The NNPCF neither agrees or disagrees with this proposal. We can see that this approach could bring opportunities for outreach, workforce development and sharing of best practice. However, we also have concerns that this approach may lead to CYP with SEND being "parked" into one school in a MAT and therefore deter inclusive practice..

The NNPCF would like to see specialist schools become centres of excellence so that their knowledge, skills and expertise can be shared, rolled out and embedded across the MAT within each Local Area.

12 What more can be done by employers, providers and government to ensure that those young people with SEND can access, participate in and be supported to achieve an apprenticeship, including through access routes like Traineeships?

Q12:

The NNPCF would like to see a requirement for each Local Authority to have an Employment pathway as part of their Preparing for Adulthood strategy. The strategy and information about Employment support for young people with SEND should be on published on the Local Offer.

The NNPCF believes that there needs to be a clearer understanding of how local authorities and providers within the post-16 high needs system can work together to manage an increased demand for support for High Needs students to prepare them for employment.

Funding also needs to be made available to FE colleges to support students with lower level SEN.
The NNPCF would like to see a more holistic approach to employment taken that considers more of the barriers that disabled people face in to get employment. We would like to explore a holistic "Employment Support Plan" that outlines the support that will address these barriers in the same way that an EHCP addresses the support a young person requires to access education.

The NNPCF would like to see details of the disability confident scheme posted on every local offer across the country.

A request from our members not to forget Higher and Further Education as a route into employment. SEND does not always mean a specific learning

difficulty or learning disabilities. Many families and young people with SEND have high aspirations to progress to University.

Chapter 4: A reformed and integrated role for alternative provision

13 To what extent do you agree or disagree that this new vision for alternative provision will result in improved outcomes for children and young people?

Neither agree nor disagree

Q22:

In a regional event there was discussion regarding the use alternative provision. Parents recognise that some alternative provision settings are very good, and they would not want these to be lost or dependent on having an EHCP. However, it is important that these are recognised as temporary interventions, that children/young people have an 'exit plan' from APs and that the underlying problems should be meaningfully addressed first.

"More support within mainstream so that things don't fall apart, I asked for help for years, we got no support."

There needs to be measures in place to capture why the AP worked for the child and how/if that can be replicated back in mainstream school.

There needs to be recognition of the fact that some CYPs would always struggle within a mainstream environment and therefore require longer term solutions.

"Alternative provision needs to be more accessible, LA's need to stick to the time frames set in the legislation and more specialist provision should be available."

We would also want to point out that many of our SEND children struggle with transitions. Use of AP should only be explored after support within mainstream has been fully assessed i.e. not looking to an AP move to access extra support or a way to obtain an EHCP.

14 What needs to be in place in order to distribute existing funding more effectively to alternative provision schools, to ensure they have the financial stability required to deliver our vision for more early intervention and re-integration?

Q14:

Parents may not be aware of existing funding arrangements for AP. If there is an anticipated increase of use there would need to be greater funding. There does also need to be consideration on funding long term placements where it can be seen a pupil needs support/provision which the mainstream placement could not offer.

15 To what extent do you agree or disagree that introducing a bespoke alternative provision performance framework, based on these 5 outcomes, will improve the quality of alternative provision?

Neither agree nor disagree

Q24:

The current quality of alternative provisions has not been raised as being an issue for parents, indeed there has been praise of the support they provide.

The framework suggests attendance is an outcome however, attendance in of itself does not equate to learning. For some pupils there may need to be greater flexibility on how they get back to a full school day.

"My son struggled so much attending there every day that he ended up ligaturing with a skipping rope in the playground. He is now unable to return to mainstream and is awaiting a specialist placement however there are no places."

Whilst it would be good to have some oversight, this should not be at the loss of the creative flexibility that some pupils will need to re-engage with learning.

Focus on attainment needs to consider what good looks like for the pupil. It's good to be aspirational but the focus should be on supporting the pupil to be their own best, maths &/or English may be out of their reach and lack of progress here would not necessarily indicate poor quality AP.

There appears to be a focus on reforming the child rather than assessing if the support and/or learning environment in their mainstream setting are appropriate. We want to see a needs led approach with school self-reflection on whether their offer can meet those needs. It cannot just be anticipated that the pupil will reform their behaviours and then seamlessly return to mainstream without also addressing if there might be training or change needed at the mainstream setting.

We would remind again that the transition between any of the settings might have significant impact upon the pupil. This needs to be factored in when assessing success of reintegration, and ideally planned for ahead of transition.

16 To what extent do you agree or disagree that a statutory framework for pupil movements will improve oversight and transparency of placements into and out of alternative provision?

Strongly agree

Q25:

A way of monitoring and tracking pupil movements would be welcomed. It could signal area where change of placements are being used in a reactionary way. In turn, this could indicate where there may be need for staff training or additional support.

Chapter 5: System roles, accountabilities and funding reform

17 What are the key metrics we should capture and use to measure local and national performance?Please explain why you have selected these.

Q17:

Data needs to be both quantitative and qualitative and include progress against outcomes for all CYP with SEND. Of the 7 indicators, only one considers holistic needs.

Data doesn't always represent the lived experiences of families. How do we measure the impact of local plans on CYP with SEND and their families?

All children and young people with SEND are individuals. How will any measure really be indicative or representative of the SEND population?

Data drives behaviour so should focus on early intervention and inclusivity. For example, we would support a key metric for schools being the proportion of CYP with SEND in their setting compared to the wider local population.

The NNPCF would like to see a national SEND Outcomes Accountability Framework which is linked to the National standards.

18 How can we best develop a national framework for funding bands and tariffs to achieve our objectives and mitigate unintended consequences and risks?

Q27:

There was no strong clear message from our members regarding tariffs.

73.50% of parent carers who responded to our survey said that they think that children and young people with similar needs should get similar amounts of funding regardless of where they live.
47.35% said that that schools delivering similar provision for a child or young person should be required to charge similar tariffs.

Our families think that funding should be linked to need i.e. individual needs must be met regardless of cost. Some families are concerned that although independent schools charge more they do not always represent value for money.

'For school as a whole to understand, my son failed out of secondary mainstream school after I said he would struggle, school buried their heads in the sand, children in the school had lack of understanding for his needs, lack of understanding for stimming and just thought he was weird. After 3 months in the school he had to leave and is now at a resource base, we are now gathering evidence for an EHCP as due to his needs not being met for so long he has now educational 6 years behind, he has complexities around school trauma and fear of peers, they have identified an SPLD and he needs 1:1 to meet his need. If his needs were truly being met at SEND support this wouldn't of happened and he would have better outcomes. Now we have been told he needs a special provision with 1:1 and the need for very small class sizes, then only provision like that is one of the special independent school that cost the LA a lot of money.'

The NNPCF would like to see similar funding to be provided for similar needs, allowing for cost of living differences across the country. Funding needs to be levelled up based upon NEED.

Chapter 6: Delivering change for children and families

19 How can the National SEND Delivery Board work most effectively with local partnerships to ensure the proposals are implemented successfully?'

Q19:

Work in coproduction with parent carers and young people.

'Listen to and work with families'

'Align incentives across the system'

73.63% of members said local authorities need additional extra or additional powers to hold schools/settings to account.

81.54% of our members believe that the government needs more powers to make schools, local authorities and health services deliver national standards for SEND services or provision.

We do not understand how responsibilities, powers, accountability and regulation will work in the new system.

We welcome the increased focus on accountability in the Green Paper and we are encouraged by the new requirements on ICSs in the Health and Care Act. However, we do not yet have sufficient clarity on how powers, responsibilities, accountability, and regulatory oversight will be organised across local authorities, schools, DfE regional directors (replacing schools commissioners) and health systems. There is a danger that in a confused system, the needs of children and families are lost. This was one of the greatest failings of the 2014 reforms, the perverse incentives and mis-aligned accountability in the system meant that different commissioners and providers did not prioritise or work together effectively enough.

The National SEND Delivery Board must help local partnerships to operate in an environment that will be determined by the Schools White Paper, the outcome of the Independent Review into Children's Social Care and the Health and Care Act. The Board must ensure that the system created for children and young people with SEND is coherent across all of these areas of policy development – most notably the incentives, powers and responsibilities of different players across the system – for example, the schools White Paper must stipulate that a good school is a truly inclusive school.

20 What will make the biggest difference to successful implementation of these proposals? What do you see as the barriers to and enablers of success?

Q20:

We asked parent carers 'What one change to current SEND provision would make the biggest difference to your child and family?'

We received over 800 responses with no clear themes to this question which illustrates:

• All needs and experiences are different
• There are flaws and problems across the whole system/country
• The system is broken
Parent carers are calling for more accountability and enforcement so that their children can get the support that they need when they need it.

The principles of the current system are the right principles but are not being implemented due to cost/increasing demand. This is leading to a loss of trust in the system. Families need early intervention not crisis intervention.

'We need strategies and willingness to listen and put support in place before crisis.'

'Being listened to and being involved in decision making at every step. Despite this being legal statute in the SEND Regs 2014 , it unfortunately does not happen . As such parents are left feeling anxious and frustrated and always the last to know of any decisions made about their child .'

21 What support do local systems and delivery partners need to successfully transition and deliver the new national system?

Q30:

• Mandatory whole work force training including support training for parent/carers
• Resources including appropriate funding
• Consistency of expectation across all services
• Service user engagement
• A willingness and commitment from key agencies to make a positive change and stop working in silo.

22 Is there anything else you would like to say about the proposals in the green paper?

Q22:

The Green Paper is silent on those young people not destined for further education, training or work.

The Green Paper focusses very heavily on educational and employment outcomes. Whilst we welcome the ambition, we must recognise there is a proportion of young people with SEND for whom that is not the right outcome (e.g. those with complex needs). The Paper must recognise the need to provide the right outcomes (e.g. independent or supported living) for this group.

Not enough about Health and Social Care

The Green paper is very focussed on schools and local authorities. It says little on health and care providers and commissioners. If we are to create a joined-up system, we must have clarity on what is expected from other key sectors.

Enquiries