

Response ID ANON-EXGA-GRU4-7

Submitted to SEND Review: Right support, right place, right time
Submitted on 2022-07-18 14:33:17

Introduction

Who is this for?

Instructions

About you

a) Welcome - what is your name?

Name:
Shelley Harrod

b) Would you like to provide your email address?

Email:
shelley.harrod@derby.gov.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?

Yes

Reason for confidentiality:

Response is a collective reply and I would need to seek permission from all parties

e) Can we publish your response?

No, do not publish my response

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

Other

If Other, please give details:
Local Authority SEND Board

g) What is your role within your organisation?

What is your role within your organisation:
Policy Manager

Not Answered

h) What is the name of your organisation?

Organisation Name:
Derby City Council - reply from LA SEND Board

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:

Agree with the standards, there are concerns that we will require resources to support the delivery and reporting on standards. Where is the guidance and how do you measure and audit the standards? Will need SMART standards that link to the outcomes. What about those without an ECHP are there

any standards for those young people with SEND? Any national standards should refer to the need to cover 0- to 25-year-olds in the broadest sense

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:

Agree this isn't duplicating it is useful. It gives consistency and good practice. Locally partnerships compliment working, we don't envisage this to be onerous in our area as already have structures in place that are continually reviewed. This can be built on further.

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:

Regional complex case panels and commissioning would help, mirroring children's social care and care homes. Lessons to be learnt from specialist commissioning in health for high-cost complex cases. Whilst it stops arguments around boundaries care is needed to ensure people don't fall through the gaps between being high cost and not sufficiently high cost. Need to consider the best way of data sharing to support the process.

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

Q4:

Single national web-based process end to end required.

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:

Parents need to be confident in the graduated response and the EHCP system and their expectations need to be managed. Information on specialist place capacity, specialisms, and alternative provision needs to be available. Parents and local authorities need shared understanding of commissioning and the speed of commissioning. Parents need good relationships with schools.

There is a concern around those children who when younger the school didn't find anything, disbelieved or didn't meet the threshold who now have the complex concerns. Now these have become critical cases.

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

Neither agree nor disagree

Q15:

This needs to start earlier. There are good points around mediation. Not enough is done, this will reduce the appeals. Will it mean more commitment to be at mediation and what about the cost of the services?

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:

No, not the experience in our area, but there is a lack of standardised reporting to the judicial system. Needs to be standardised through the Royal Colleges.

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:

We welcome this. Appreciate focus on early years and getting this right is essential to the child's future throughout their school life. Need to keep the focus on the child.

1001 critical days just one example.

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:

As this needs to be brought up to date and relevant for practice.

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?

Strongly agree

Q19:

Some of the thoughts of SENCOS

I thought if you had been a SENCO in the previous 3 years to taking on a role, the qualification was not required?

I agree with this. Headteachers need to ensure that the SENCo is obtaining their qualification or already has the qualification and Headteachers need to support with this.

I think that the Headteacher should do some inclusion specific training too as there are disparities

I have been a SENCO for 26 years and have not taken the qualification. I've learnt as I go along.

Strongly agree this is a specialist role that requires specialist knowledge and experience to be effective.

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.

Agree

Q20:

Local decision

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:

Focus on independence on the whole of the child's career and don't over provide. Flexibility around apprenticeship levy. Recommend 20% of unspent levy for young people in this group.

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?

Strongly agree

Q22:

This really adds value. The clarity helps to change behaviours and get the child in the right place.

Understanding alternative provision and specialist provision as one system is important. When is it they need specialist support and when they need behaviour support?

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:

Fund them to provide outreach to allow children to remain in mainstream schools. More temporary alternative provision and turnaround placements. Ultimately PRUs should only be for those with most severe needs. Recognise the need to protect small providers as well as larger ones.

Too many young people are in PRUs, using them as a schooling option, this is not ideal.

There are concerns about the expense of transport to alternative provisions. Where is the money for the LA to support this?

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?

Strongly agree

Q24:

The transition from SEND at 25 to adulthood needs early effective management.

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:

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:

Measuring the standardised 20-week process is useful, but we are not always measuring what we value. Need to move away from process and better understand the outcome and impacts of the life course the young people go through, need a greater focus on outcomes. Need to measure the strength of the graduated response and the number of placement breakdowns. Measure the effectiveness of the Inclusion Plan. Are children and families prepared for adulthood? Measure ambition and independence skills.

If a school seems to have failed on several occasions, what support is needed for the SENCO and Headteacher? There is value in understanding the type of SEND, ethnicity etc to identify gaps.

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:

Tariffs haven't helped in health at all, they have led to a number of unintended difficulties and higher-level tariffs. Health is now moving away from tariffs. Not recommended.

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:

Need to engage and build strong relationships in each local area. The link officer needs to be properly resourced to fully understand the local structure and area. Needs to be more than superficial knowledge, needs to be engaged and have strong relationships to understand the complex system, what good outcomes look like and properly understand the local area.

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:

Insufficient funding to implement the ambition of the reforms. Culture, partnerships, and an agreed vision are essential, but given that there are already big challenges in the system funding is necessary to meet the increased expectations.

Sharing expertise and best practice is useful.

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

Q30:

Network of national advisers to share best practice. Expertise sharing is really key. Working with key organisations such as the national high needs delivery board and think tanks, then sharing information through networking and benchmarking.

Nationally we need to reflect how we are locally. This is a partnership, has to be joint with health, LA, social care. Joint approach so we are all on the same page.

Recognition of the journey required as we are all starting from a different place.

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

Q22:

The crisis is now, any new funding won't be until next year, but the change is needed now.

Is there funding available for the transformation? The revenue funding available isn't clear. Already huge concerns around high needs funding. Home to

school transport costs to get to placements needs to be considered.

There are risks around implementing the reforms because of funding.

Everyone starting from a different place, so some disruption to the system.

A note from taking to parent/carer forums - Questions weren't easy to gain feedback from parent carer forum and the regional groups didn't feel the questions were good. They considered that the main issue was about reducing parent and carers rights. Nothing new in law. Reducing rights to redress rather than the cause. Decision makers not abiding by the laws.

Enquiries