Nottingham City Council SEND Sufficiency Strategy 2023-28 Consultation Report

Purpose of this report

To share findings of the consultation on the draft SEND Sufficiency Strategy 2023-28.

Why did we consult?

Nottingham City Council recently held a public consultation on how we plan to provide additional capacity and strengthen education for children and young people with special educational needs/disabilities (SEND) over the coming years.

We propose to invest capital funding received from the Department for Education (DfE), to create additional high quality inclusive places and to improve existing provision for children and young people with complex needs or who have an education, health and care plan (EHCP). The funding can also be used to support SEND pupils without an EHCP and pupils who require alternative provision without an EHCP, where appropriate.

The consultation presented the draft SEND Sufficiency Strategy, which included key data, evidence and trends to inform decisions. It also outlined key capital priorities and broad proposals to increase high quality inclusive provision and improve existing provision, to support all schools to be inclusive and to meet growing demand.

We welcomed and encouraged feedback from all stakeholders, to help us develop plans for increasing and improving provision.

This paper provides a summary of the findings and key themes from the consultation.

When did we consult?

The consultation was open from 25th January to 28th February 2023.

Methodology

- A questionnaire was made available on the Council's Website through the on-line Consultation System. Details were promoted through various channels, targeting parents/carers, young people, schools, governors, local providers, specialist staff and other stakeholders.
- Consultees were also provided with the option to email comments directly.
- We offered paper copies, Large Print or Braille of the proposal information or survey, or help with translation, if required.
- All responses have been consolidated and subject to thematic analysis.

Participation, survey responses and analysis

There was a total of 124 responses.

Demographics analysis for responses received

- 75% Female, 20% Male, 5% Non-binary or not specified
- 5% Consider themselves to be disabled
- 75% White British, 7% White other, 6% Asian, 2% White Irish, 2% Mixed, 1% Black, 7% not specified
- 83% Heterosexual, 3% Bisexual, 2% Gay, 12% not specified

 43% No Religion, 34% Christian, 17% Prefer not to say, 4% Muslim, 1% Hindu, 1% Jewish

Questions

1. In what capacity are you responding to this survey?

The breakdown of respondents is as follows:

Respondent	Percentage	Number
Member of staff	31%	39
Professional working with young people with SEND	22%	27
Parent/carer of a pupil with SEND with an EHCP	15%	18
Parent/carer of a pupil with SEND without an EHCP	14%	17
Other	7%	9
Young person with SEND without an EHCP	6%	7
School governor	3%	4
Young person with SEND with an EHCP	2%	3

2. Which organisation do you work for?

There were 36 answers to this question of the 39 staff who identified as such:

10 responses were from primary schools, 6 were from secondary schools and 4 from special schools. 5 responses were from Hospital and Home Education Learning Centre (HHELC), 5 from Nottingham City Council and 3 from Multi Academy Trusts (MATs). Governors from 3 primary schools also responded.

3. To what extent do you agree or disagree with the proposed SEND Sufficiency Strategy, the key priorities and the proposed schemes?

There were 119 responses to this question.

Response	Percentage	Number
Strongly agree	45%	53
Agree	36%	43
Neither agree or disagree	11%	13
Disagree	7.5%	9
Strongly disagree	0.5%	1

4. Reasons for answer?

There were 105 responses to this question * (see note below).

5. Do you have any suggestions to improve the Sufficiency Strategy? E.g are there other types of provision that you think are required?

There were 98 responses to this question * (see note below).

6. Do you have any further comments on any aspect of the draft strategy, key priorities, the proposed schemes or anything else you wish us to consider?

There were 61 responses to this question * (see note below).

* Feedback for Questions 5/6/7 included many overlapping themes, so the analysis of these responses have been combined.

Overview

The consultation showed that there was a high level of support for the priorities set out in the draft strategy document. Respondents also generally felt that the actions presented in the consultation document to achieve the priorities were the right ones, while commenting that how they are implemented is key.

81% of respondents agreed with our broad priorities to enhance facilities in mainstream schools to ensure that young people with SEND have the best environment and resources to meet their needs, close to home within their local community. Also to build on the special school expansions and additional Specialist Resourced Provisions within mainstream school, which have already been delivered in recent years.

11% neither agreed or disagreed, with a few comments stating that more detail is needed on what, where and how this will delivered.

8% disagreed. The main points made by respondents who disagreed with the proposals were that schools are finding it very hard to recruit good quality support staff to enable the SEND pupils to access mainstream education, without disrupting the learning of the rest of the class. Existing support staff do not necessarily want to be 1-1 with SEND children. SEND pupils deserve the best possible education. So do the other 29 pupils in the class. Teachers are already stretched and being asked to do more than ever with less support.

Other points raised were:

- There needs to be more than the proposed extra capacity and the time frame is not sufficient because children and young people are being left behind in the meantime so there needs to be an emergency short term plan.
- We work very hard in mainstream to accommodate SEND learners and feel that once we have decided that we can no longer meet needs, there should be an appropriate alternative rather than simply extending an already exhausted offer at mainstream.
- We need more specialist schools with specialist flexible tailored teaching not units within mainstream settings which will still be trying to crowbar children into a mainstream agenda.

The feedback generally related to the following 6 overarching themes. Although there is clearly some overlap, a summary of the main points raised is set out below under each theme:

- Capacity, funding and other resources
- Training, recruitment and retention
- Support services for schools and pupils
- Diagnosis, EHCPs and access / pathways
- > Alternative Provision & Exclusion
- > HHELC

Capacity, funding and other resources

This was the most commented on theme. Most respondents agreed that there is a clear need for more specialist provisions in mainstream schools, for children who require a tailored curriculum and learning environment, but are not in need of the level of provision in special schools. It was widely thought that giving parents/pupils more choice in terms of suitable provision and facilities that meets their child's needs in their local community, will be hugely positive.

Many respondents also supported an increase in special school capacity, which is a priority for those with the most complex needs. Although there was significant support for additional specialist capacity in both special and mainstream schools, some concern was expressed that this may not be sufficient to meet the extent of growing demand, urgency and range of need.

It was commonly expressed that the number of primary specialist provision places is insufficient to meet needs and form positive connections with school and learning early on.

Several respondents stated that schools would benefit from more financial support to meet the needs of their pupils, including those children and young people without an EHC plan.

Some school staff expressed that they have already invested significant sums of their school budget to provide provision for SEND children and that more funding is needed to make this sustainable for schools to meet the needs of pupils in mainstream. Although it was also cited that not all schools use their SEN top-up funding for this purpose.

Other comments included:

- Expansion of provision in both special schools and in specialist provision in mainstream schools, will reduce travel time, enable children and young people with SEND to be part of their local community, and help to increase their progress, attainment and outcomes.
- Without additional special school capacity, there is a risk that more children and young people will be placed in specialist independent provision, which are more expensive than state-funded schools and may not be local to the child's home.
- Specialist bases work well in mainstream schools to allow a flexible, blended approach, with tailored teaching will be highly beneficial as long as they are taught by a specialist teacher and not a teaching assistant.
- Prioritise developing, supporting and expanding local SEND support hubs and existing provisions which schools have already invested in,
- The SEND system for requesting high level needs funding is over complicated and takes too much time for a very small amount of money.
- With the spike in specialist provision required at KS3, need to consider how
 mainstream secondary schools can be more inclusive and accessible for pupils,
 particularly with Autism.
- Positive example shared of KS3/4 specialist provision in a secondary school which effectively meets the needs of pupils with MLD.

During the consultation, a number of expressions of interest were made by schools (a representation from primary, secondary and special) in relation to the proposals set out in the draft strategy, to create additional capacity and provision for children and young people with SEND.

The primary and secondary schools outlined their desire to create Specialist SEND Resourced Provisions within the mainstream settings, with pupils spending some time in the mainstream classroom, while accessing specialist resources and support as required. The proposals would be to create additional specialist capacity in the mainstream primary and secondary phases, to meet the needs of pupils with Autism and moderate learning difficulties. The provisions would cater for existing children and those in the wider community with varied complex needs, where the schools need a more suitable resource to meet these needs through specialist staff and a tailored curriculum.

There was a clear commitment to work with the LA and provide additional LA commissioned places to pupils with significant needs, not just for the school's existing pupils but for those in the wider local area.

A submission from a special school, proposed an expansion to provide an additional 40 places (or more), for children and young people aged 4-19, who have a diagnosed primary need of autism and who require a specialist placement. The very large majority of young people currently attending the school have multiple and complex needs.

Training, recruitment and retention

The majority of respondents supported the priorities for capital funding to invest in additional provision, while many also stressed that staff training must be at the core of our strategy. Views commonly expressed that improved training and support will increase the ability of mainstream education settings to be consistently inclusive and to embed inclusive practice in the everyday offer.

It was frequently commented that specialist staff resource and expertise is significantly lacking to meet the growing demand, particularly in Autism. But also how we need funding to enable all school staff to be trained in teaching and communicating with children with SEND.

The point was made several times that schools are struggling to recruit good quality support staff, to enable all pupils to successfully access mainstream education, without disrupting the learning of others. It was raised that this is both a funding issue and an issue about insufficient availability of skills required.

An example was shared from a mainstream secondary school wanting to enhance their current provision by providing regular training on the latest developments in SEND, using evidence-based practice and engaging with the latest research to ensure that the staff working in the school are equipped to support and enhance the learning experience for all young people – but particularly developing the curriculum for SEND learners. It was acknowledged that there is much external expertise to access to support the professional development of staff. With the opportunity to build these opportunities into annual CPD planning to build on trauma informed teaching approaches and to utilise the Autism Education Trust training.

Other comments made:

- Consideration needs to be made for Teaching Assistants to be qualified in a specific area of need and paid fairly for that qualification. 1:1 support is a primary support but TAs are not always qualified and therefore the children are not supported in terms of their capabilities instead they are just monitored. This is not fair nor is it inclusive.
- More emotional wellbeing support for staff is needed.

- The high number of pupils with SEND that are excluded from schools are due to a lack of adequate investment in appropriate support but also a reflection of how some schools discriminate and lack awareness of complex needs and EDI.
- Need for more trauma informed training.

Support services for schools and pupils

There were several comments in relation to needing improved support services for schools to maximise their ability to be consistently inclusive and meet the needs of pupils in mainstream where possible. It was stated that additional funding for schools to access this is essential. There was a high level of support for the proposals to increase provision for children and young people with Autism, while stressing that there are other needs which also require additional capacity and specialist support.

The types of support mentioned included:

- Increasing capacity in the LA SEND Support teams
- Review the support packages provided to school so that they are fit for purpose and enable timely intervention and support.
- More support for schools and pupils with social, emotional and mental health (SEMH) needs, some of whom struggle in mainstream settings due to emotional or anxiety challenges, without the right support.
- Facilities to support children with physical disabilities/ medical needs so they can access physiotherapy, occupational therapy, speech and language therapy, sensory OT work and medical interventions in a school environment that has the facilities to meet these needs.
- It is essential that we have planned communication routes between speech and language specialists, educational psychologists, the autism team, paediatricians, and other health professionals to ensure that the information on each child is shared in a timely and impactful manner.
- Need trauma informed practice in schools.
- Make the bidding process easier for HLN funding, which is insufficient for what they need to deliver.
- Autism support needs to be readily available in schools without additional cost to schools - something funded by the LA to support those schools who have significant numbers of children with autism but not accessing Special schools or resourced provision.
- Both mainstream and special schools should have more educational psychologists able to offer support to children and young people who may not meet the criteria for accessing CAMHS, to reduce the risk of them being excluded.
- British Sign Language (BSL) in schools. Deaf awareness and BSL training for staff and pupils. This will allow for better communication and inclusion for deaf pupils.
- A streamlining of systems is needed for children to access the right provision, so Head teachers and SENDCo's are not constantly battling for suitable places and support, to meet a child's needs.
- Collaborative working between the LA and the NHS to improve access to support services.
- Undertake annual audits to ensure that the provision is suitable and that the right resources are going in the right places, for each school.

Support for parents/carers was also raised, including:

- Not all families are aware what services are available or the routes for accessing them, with complicated paperwork and processes. Better communication, information sharing and awareness raising is essential.

Diagnosis, EHC plans and access / pathways

Several respondents commented that getting a diagnosis is extremely challenging and it is not provided early enough – that children may be identified as possibly having additional needs in early years and yet diagnosis can be years down the line. Suggestions that more early intervention for diagnosis and support both within and outside schools is needed. It was felt that this would increase the ability of mainstream schools to be consistently inclusive.

An example was shared from a mainstream secondary school which offers a bespoke pathway for pupils with more specific needs. This provides pupils with the opportunity to develop skills in problem solving, life and practical skills, communication skills and travel training. Additionally, whilst supporting their studies in the core subjects and their optional course choice. Specific qualifications can be taught in small groups or 1:1, tailored to their needs. The value of partnership working and sharing good practice was expressed – with parents, pupils, local special and mainstream schools and the LA.

Other comments or themes included:

- A streamlining of systems for children accessing the right provision is needed, while fully informing and managing expectation of parents/carers.
- Often children and young people who need the most support don't have an EHC plan. Need to make this easier, fairer and more accessible for parents/carers.
- The EHC assessment process varies between LAs, which can then create problems and inconsistencies when a child moves to a different LA area.
- Even with an EHC plan, the funding is inconsistent due to complicated funding bidding process.
- A clearer criteria is needed to establish the appropriate pathway, e.g special or mainstream with specialist support.
- Cognitive Needs/Academic Learning Needs pathway for diagnosis. There are clear Neurodevelopment Pathways in both City and County however they exclude children with cognitive needs only.

Alternative Provision (AP) & Exclusion

Several respondents stated that AP capacity needs to be increased and improved, particularly for pupils with significant social emotional and mental health needs and school-based anxiety. There were suggestions that High Needs budgets are being used to fund very expensive AP places where attendance and ambition is low. Also that places are being outsourced to a number of different provisions of varying quality. Comments that reintegration back into mainstream must be the focus.

Other comments included:

- Suggestion to hold more after school clubs and activities within schools for young people with SEMH - tailored for those at risk of exclusion.
- AP settings needs to have more robust attendance and academic requirements.

Hospital and Home Education and Learning Centre (HHELC)

A few respondents stated that an expansion of HHELC is required as there is insufficient capacity and staffing to accommodate need. With suggestions that a new, purpose-built facility in a city central location would be much more fit for purpose that the existing temporary building.

Comments were made that the HHELC offer needs reviewing and also in relation to location and structure and expertise of staffing, as well as a review of the funding arrangements for staff in other settings such as QMC.

Another comment was made in relation to how the High Needs funding is allocated and used between settings, i.e. when the child is on roll at a school but spends most of their time at the hospital school.

Early Years & Post-16 Provision

A few comments were also raised about requiring more Early Years and Post-16 SEND specialist support and provision – both in special schools and in mainstream. The High Needs capital funding aligned to this strategy is targeted towards statutory school age pupils. However, this will be fed back to the relevant services and settings that support these pupils, to review ongoing and future requirements.

Glossary

CHILDREN AND YOUNG PEOPLE – children and young people AUTISM – Autism Spectrum Disorder SEMH – Social, Emotional & Mental Health MLD – Moderate learning difficulties EHCP – Education Health & Care Plan HHELC - Hospital and Home Education and Learning Centre AP – Alternative Provision