



National Network of Parent Carer Forums

'Our Strength Is Our Shared Experience'

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Laura Brackwell
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Dear Laura,

Thank you for the opportunity to submit a response to the National Audit Office Inquiry into support for pupils with special educational needs and disabilities.

The National Network of Parent Carer Forums is made up of 152 parent carer forums based in local authorities across England. Our member forums have a membership of over 93,000 parent carers covering the full range of special educational needs and / or disabilities (SEND). This give us a unique insight into the lives of families with a child or young person with SEND.

In late 2018 we conducted a survey of our membership to support our response to your inquiry. The findings of this survey form the basis of our submission but we also draw upon other sources of evidence such feedback from over 100 regional meetings, our very active social media platforms and our annual conference at which we hosted a workshop on funding of SEND services.

We attach our response. If you have any comments or questions, please do not hesitate to contact us

Yours sincerely

Maureen Morris (Co-chair)

Mrunal Sisodia (Co-chair)

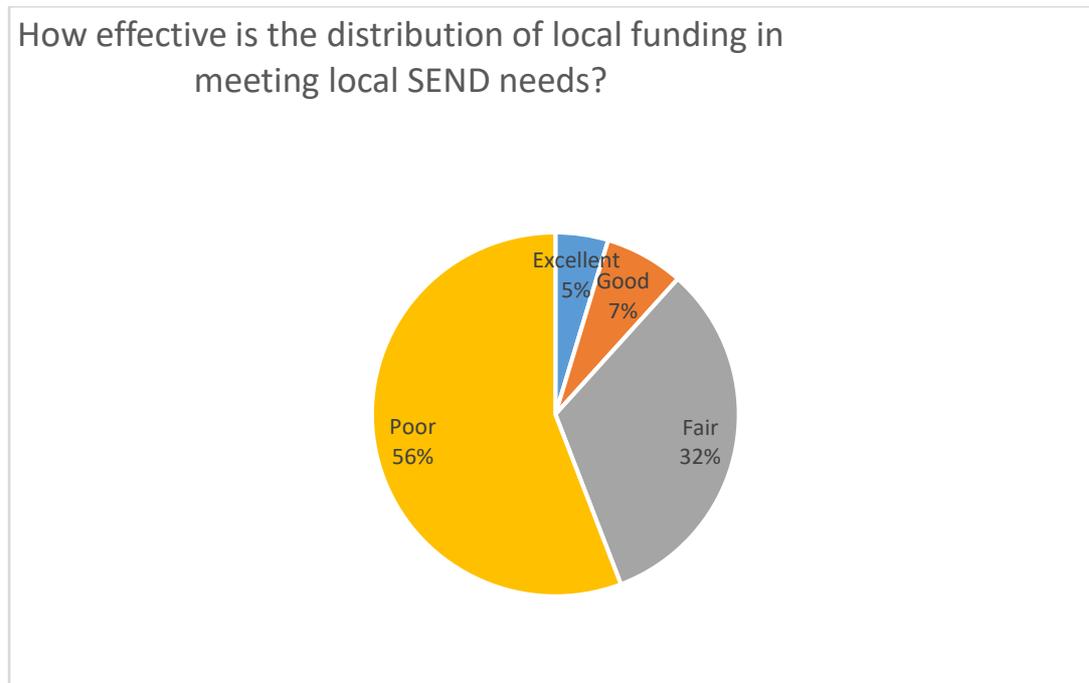
NATIONAL AUDIT OFFICE VALUE FOR MONEY STUDY: SUPPORT FOR PUPILS WITH SPECIAL EDUCATIONAL NEEDS AND DISABILITIES

STAKEHOLDER CONSULTATION QUESTIONS

1 To what extent has the Department for Education created a set of incentives that influence local authorities and schools to direct funding to pupils on the basis of need?

2 Do you consider that need is assessed consistently across England, and between different groups of pupils (for example, between boys and girls or between different sorts of need)?

Parent carer forums tell us that the distribution of local funding does not effectively meet local needs¹. In our survey only 12% of forums thought that the distribution of local funding was excellent or good in meeting local needs. 32% said it was fair whilst over half (55%) said it was poor.

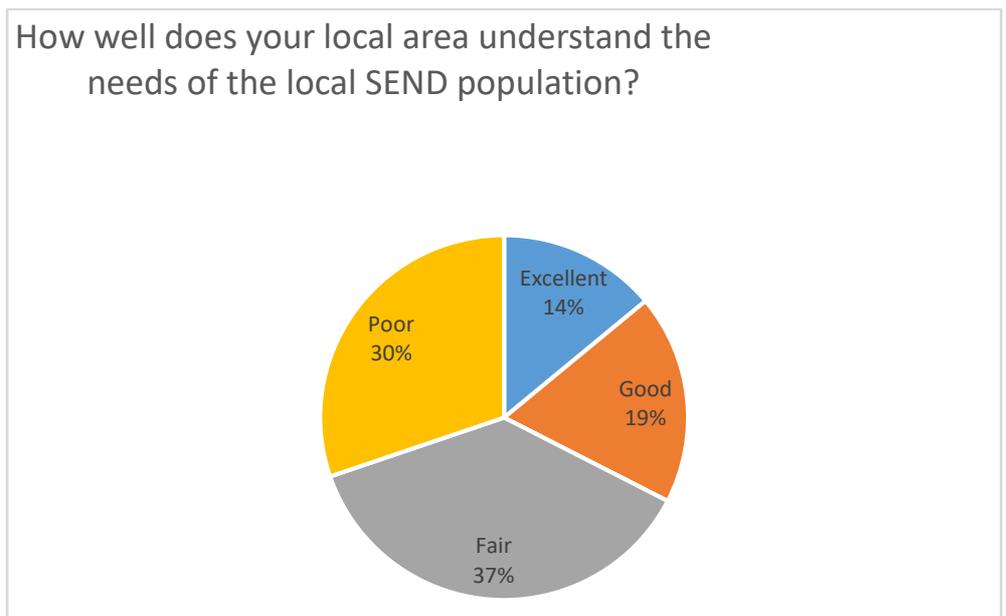


¹ NNPCF survey of parent carer forums December 2018. Based on responses from 43 forums.

Our survey highlighted a number of key reasons for this:

1. Local areas do not have a good understanding of local needs

In our survey only a third of forums said they thought that their local area had an excellent or good understanding of the needs of their local SEND population whilst two thirds thought the understanding was fair or poor².



If local areas do not understand the needs of their local population, they are unlikely to be able to allocate resources effectively to meet them.

Parent carer forums also report that local joint strategic needs assessments often have only very short or cursory reference to special educational needs with little analysis or projections of trends or requirements. Even when the JSNA does mention SEND, strategic decision making does not align with the requirements identified. For example,

“the LA carry on regardless ... it does not meet their own targets or JSNA”

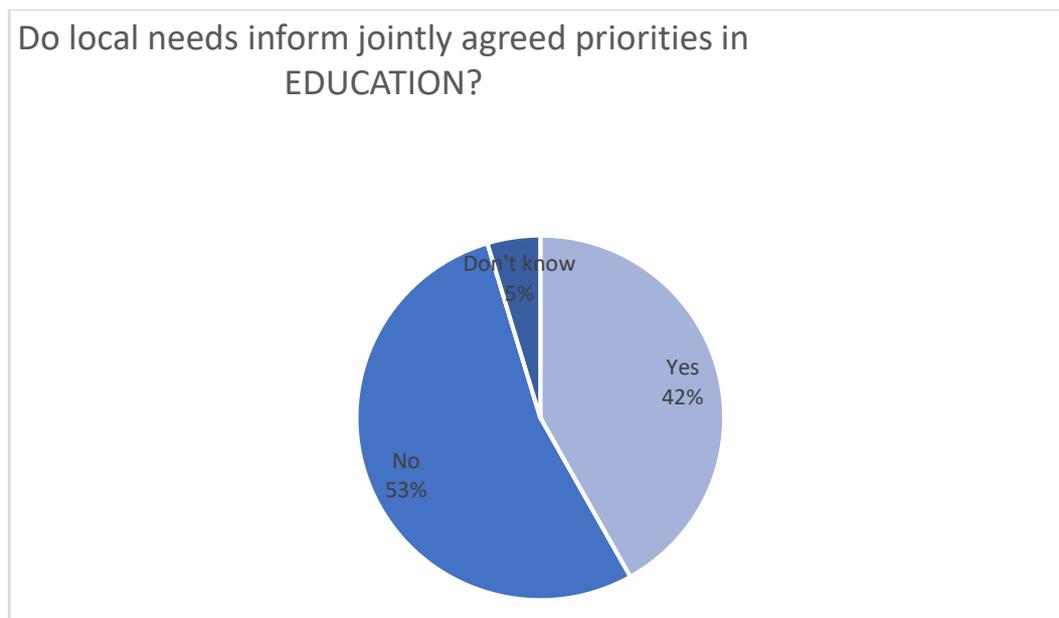
² NNPCF survey of parent carer forums December 2018. Based on responses from 43 forums.

“There is concern that the high needs block is not being used effectively as during the latest SEND area review ASD places have been removed from primary enhanced resource school [name removed] which does not fit with the growing need for primary ASD places as pointed out in JSNA”

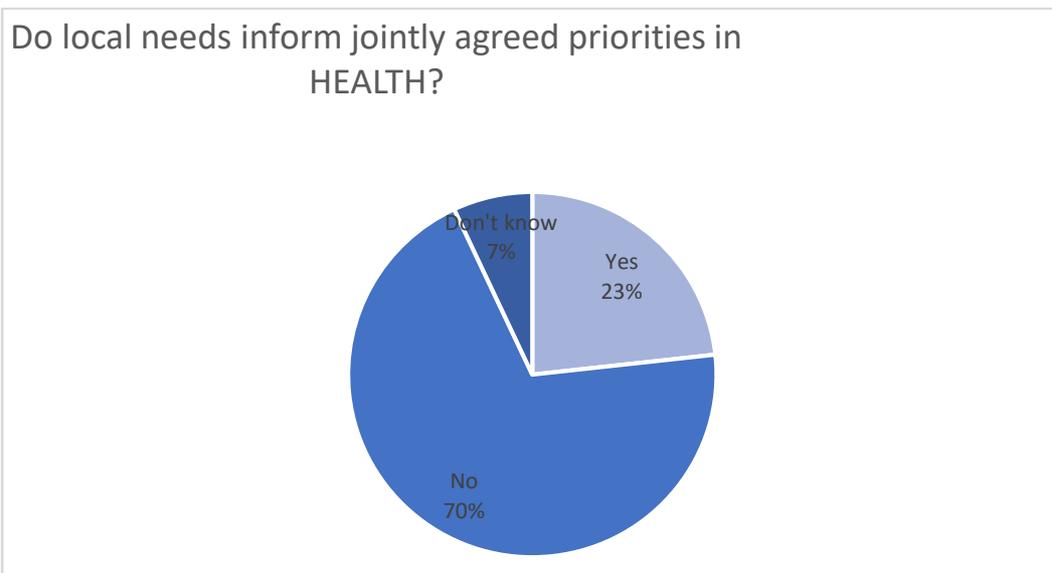
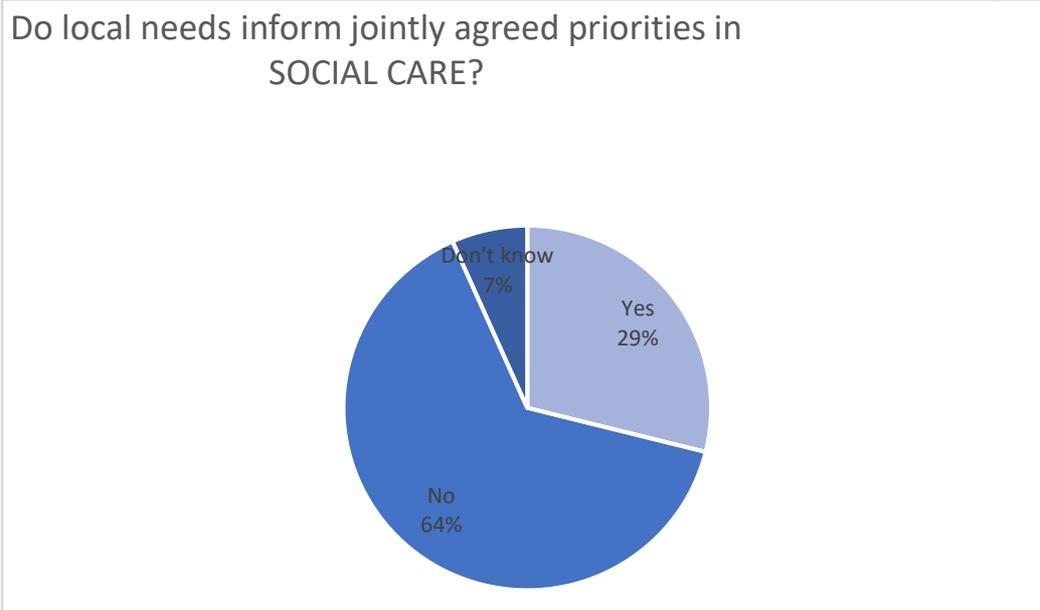
2. Local areas do not have shared priorities across education health and social care based on needs

A key requirement of the SEND code of practice is that local areas develop shared priorities and jointly commission services based on these priorities. Our survey of parent carer forums found little evidence of shared priorities that would lead to effective commissioning.

Forums said that local needs informed priorities in a minority of local services (42% in education, 30% social care and 23% health)³.



³ NNPCF survey of parent carer forums December 2018. Based on responses from 43 forums.



3. Local areas are not co-producing with families to understand the needs of the local community and effectively allocate resources.

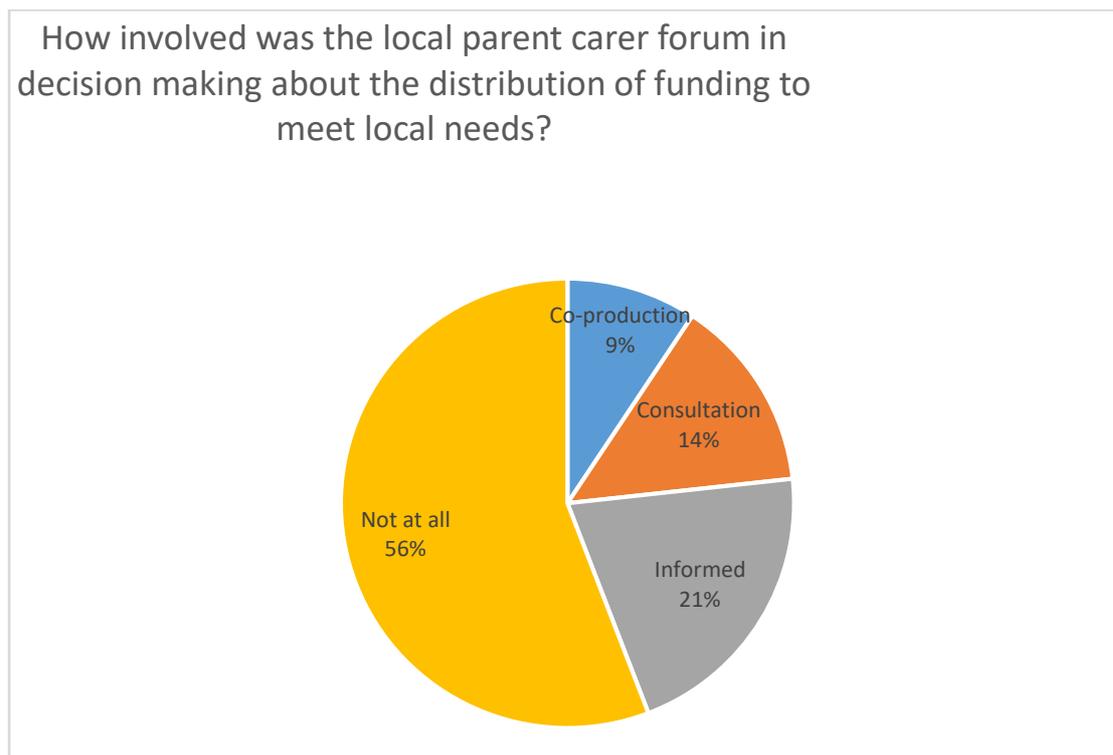
One of the principles of the SEND Code of Practice is to co-produce strategic decisions with the local community. The culture of co-production has not yet been embedded consistently across education health and social care services. We understood that changing the culture across the whole system was going to

a challenge: it requires a change of behaviour across 152 local authorities, 211 Clinical Commissioning groups, 24,000 schools, 400,000 teachers and countless medical and social care practitioners.

In the autumn 2017 SEND implementation survey⁴ 69% of the parent carer forums that responded reported that they were fully or largely involved in strategic planning and coproduction of SEND services. 31% reported they were moderately or poorly involved.

Anecdotal evidence supports this. We hear that strategic co-production is strong in approximately one third of areas, moderate in a third and still developing in a third.

In our 2018 survey suggests that when it comes to resource allocation, there is still some way to go.



⁴ The 10th SEND implementation survey
https://contact.org.uk/media/1175220/tenth_send_reforms_survey_summary_report.pdf

Families understand what services are working and which are not. They can provide a real insight into how the money that is available can be used most effectively. For example:

- In **Lincolnshire**, the area has developed a **special schools strategy** that will see a £50m investment over the next few years in co-production with the parent carer forum
- In **Bedford Borough**, a new **short breaks** contract was torn up and is the process of being recommissioned when the parent carer forum highlighted fatal flaws in its design to the Director of Children's Services.
- In **Northamptonshire** the forum co-produced the SEND strategy for 2017-20 during the 20:20 vision event series.

3 How far do you consider that the Department has made clear what it expects local authorities and schools to do to support pupils with SEND, and supported the exchange of good practice?

The SEND code of practice gives schools and local authorities very clear guidance on what is expected of them.

Through the Delivering Better Outcomes Together contract, the Department for Education has provided good mechanisms for sharing of learning and best practice across areas. For example, the regional networks, SEND regional advisers, the work done by NDTI on preparing for adulthood, the support for joint working have all been well received. In addition, initiatives such as the Whole School SEND approach from NASEN provide effective guidance for schools.

However, more needs to be done to embed the culture that underpins the principles of the Children and Families Act. Not enough local authorities, health commissioners and schools are working in a way that places the wishes of children and their families at the heart of services. Co-production with families and joint working across agencies to wrap services around families in an effective, person centred way remains an aspiration rather than a reality in most areas. The Department did not focus much attention to these aspects of the Children and Families Act during the implementation phase. Now that has passed the DFE could definitely do more to emphasise the value and importance of culture change and what is expected.

4 To what extent do you consider that there are:

a. enough school places, of the right type and in the right places to meet the needs of pupils with SEND effectively?

The reports we hear from parent carer forums suggest that the schools' system is struggling to meet the needs of SEND children.

In particular, there is a move from mainstream schools to special schools. In 2010 55% of children with a statement attended a mainstream school. In 2018, only 44% of school age children with an EHCP or statement attended mainstream school. The number of children with statement or EHCP in special schools has risen from 96,000 in 2010 to 127,000 in 2018⁵.

Our members report that mainstream schools are struggling to meet the needs of children with SEND and many parents feel that they have to seek an EHCP and move to a special school even if their child's needs could have been or were previously met in the mainstream school. This is particularly prevalent when there is a change from primary schooling to secondary schooling. This scenario drives up costs in the system. Official statistics support this:

- The demand for EHCPs is increasing with a 74% increase over 3 years. In 2014 there were 37,063 requests for an EHCP or statement. In 2017 there were 64,555 requests for an EHCP⁶.
- The number of children with SEND being home schooled (or educated elsewhere) is increasing from 1355 in 2010 to 2397 in 2018. Anecdotal evidence from our forums suggests that these official statistics are the tip of the iceberg. Further anecdotal evidence suggests that it is not the choice of the parent or the child to be home schooled but result of a lack of placements, ability to meet need or exclusions that lead parents to home school.
- Exclusions of children with SEN are increasing from both mainstream and special schools.

⁵ Department for Education: Statements of SEN and EHC Plans: England 2018

⁶ Department for Education: Statements of SEN and EHC Plans 2018.

<https://www.gov.uk/government/statistics/statements-of-sen-and-ehc-plans-england-2018>

This means that there is increased pressure on special schools which parent carer forums report are “full”.

There are also specific types of provision that parent carer forums consistently highlight as having shortages of places. Most notable here are ASD and SEMH provision.

b. sufficient appropriately trained staff, including in local authorities and SEND coordinators in schools, to support pupils with SEND effectively?

We have little empirical evidence on staffing levels although forums report that there are shortages of staff and provision in a number of key areas:

- CAMHS
- Therapy services (speech and language therapy and occupational therapy in particular)
- Specialist ASD services
- Educational Psychologists

SENCOs report that they are under constant time pressure with many being expected to perform their roles as an “add on” to their existing responsibilities. Also, SENCOs report that often they have little influence with the senior leadership at schools who are focused on budgets and targets.

Many parents report that whilst many SENCOs are supportive, too frequently they do not have the dedicated time, influence or support from the senior leaders and school governors to do the role effectively.

Forums report a high turnover of staff in positions of SEN management and leadership. This means that remaining staff are sometimes promoted with limited experience and that new staff members sometimes have less experience than the families they are expected to support.

5 What more could be done to measure outcomes for pupils with SEND?

Measuring outcomes for children with SEND is difficult because by definition outcomes are very person centred. This means that consistent measurement

and comparison is difficult. However, there are some tools that might be beneficial:

- A qualitative large survey of parental experiences conducted every year. The last such survey was conducted in 2015 upon the introduction of EHCPs. We would like to see this survey repeated.
- Each child has specific outcomes in their EHCP. Local authorities could monitor progress against these SMART outcomes over a 3 year period, recording how many individual outcomes were met.
- A large scale long term cohort study of young people with SEND to track where they end up five/ ten/ fifteen years after leaving education. Parents describe leaving education as a “cliff edge” with nowhere for their young people to go.

6 What are the main strengths and weaknesses in the current system, and what are the consequences of these?

Across the country, we cannot say that we have met the aspirations of families or consistently delivered the legal requirements of the SEND reforms.

The environment into which the reforms have been launched means that they have not led to the wholesale transformation that is required. Our membership have highlighted four key reasons why:

1. The impact of financial constraints on local authorities

We have seen an increase in concerns from forums that their local areas cannot deliver the legal requirements of the Children and Families Act with constrained resources. The demand and scope of services for SEND is increasing at a time when local authority finances are under ever increasing pressure (for example the number of EHCPs and statements have grown by 82,000 to 320,000 between 2014 and 2018).

Recent restrictions on moving money between the dedicated schools grant and the high needs funding block have been lifted and have exacerbated the pressures on SEND resources in many local authorities

In addition, the failure of many areas to make meaningful progress with joint commissioning has amplified this situation. What resources there are have not necessarily been deployed in the most effective ways.

Forums have also raised with us the impact they observe on the local workforces. Re-organisations, temporary staff, and frequent changes in personnel have meant that continuity and morale of practitioners is often poor. Embedding the cultural and behavioral changes required by the Children and Families Act against this backdrop is very difficult.

2. Incentives for school leaders

Our membership reports that mainstream schools are becoming less inclusive. Official Department for Education statistics show an increase in exclusions for children with SEND and an increase in the proportion of children with SEND attending specialist provisions. Forums also report an increase in off-rolling and unofficial exclusions (e.g. part time timetables, missing certain school activities). Currently, school leaders are not sufficiently incentivised to adopt inclusive practices. For example:

- The Ofsted inspection framework is very academically focused
- School success measures (e.g. Progress 8) remain academically focused
- The national curriculum, and in particular further education courses, have narrowed in the last 10 years
- The value of the, often considerable, progress a child or young person has made against SMART targets in the EHC plan is not systematically measured and recorded within the school system as a whole, nor are school leaders rewarded for such achievements.

All of this means that many schools do not take a holistic, graduated approach to SEND. Those that do, rapidly become “SEND magnets” as parents of children with SEND recognise their inclusive approach and flock to them. We would like to see changes to the Ofsted inspection framework and school success measures to incentivise school leaders to take a more inclusive approach. In addition, widespread adoption of the whole school approach to SEND as advocated by NASEN is key to this.

3. Accountability

There are few hard-hitting measures that local authorities can take if schools are not adopting an inclusive approach. The fragmentation of the school system over the last decade means that local authorities have only limited levers to change the behaviour of schools and local services.

The introduction of the local area SEND inspections and the current national trial for the single route of redress are a step in the right direction, however, our members would like to see a further strengthening of the accountability framework for SEND with local authorities given greater powers to intervene where necessary.

4. Low prioritisation of SEND across health and social care

SEND is not a high priority for most local social care teams or for the majority of clinical commissioning groups. This means that many local social care and health commissioners have not focused on the requirements of the SEND reforms and this means:

- Many practitioners are not aware of their responsibilities under the Children and Families Act
- Families report shortages of key services (e.g. long waits for ASD diagnosis and services, speech and language therapy)
- Services are not delivered in the joined-up way required.

We would like to see greater communication from central government and NHS England to ensure that local health and social care services prioritise SEND appropriately.

7 Is the current system sustainable? How could support, and outcomes, for pupils with SEND be improved, within current funding levels?

Our membership endorses the key principles of the 2014 reforms, namely a system based on:

- Coproduction not confrontation
- Joint working across agencies, not silo based working

- Person centred services rather than provision led services

Where we see these three elements together, parent carer forums have been involved in transformative changes to services within existing funding

Embedding and promoting coproduction, joint working and commissioning across agencies with a person-centred approach is the key to delivering effective services efficiently.

Some examples include:

- In **Peterborough** a new **Autism and ADHD pathway** has been developed. Previously families waited up to two years for a diagnosis and only 10% of cases received help. Under the new pathway, more than 70% of families receive support and now within weeks or months.
- In **Hertfordshire** a new **0-25 social care service** for children with SEND has been well received
- In **Wiltshire**, the **short breaks** service was used by less than 100 families. It has now been redesigned and is used by 1500 families and is positively viewed by 98% of families in a recent survey of 1200 users.

The DfE's continued support for parent carer forums has been a major success of the reforms. The modest sums spent (£2.28M in 2017-18) each year have delivered astounding results:

- Parent Carer forums have 93,412 members. This represents a phenomenal growth - in 2008, 456 parent carers across England were known to be involved in planning local services.
- Parent carer forums operate in some way in all 152 local authority areas in England.
- The impact of forums is also growing with increasing numbers of forums reporting that they have good co-productive or participative relationships with education services in local authorities (for details see the Contact Parent Carer Participation Annual Report <https://contact.org.uk/get-involved/parent-carer-participation/news-for-forums/>).
- Forums are actively working to reach seldom heard sections of the community (e.g. religious, cultural, low income, families with a disabled parent, home educated) that have previously been excluded from decision making processes (for details see the Contact Parent Carer Participation Annual Report <https://contact.org.uk/get-involved/parent-carer-participation/news-for-forums/>).

The examples above illustrate the impact of parent carer forums in improving services. More examples can be found in the NNPCF annual report <http://www.nnpcf.org.uk/wp-content/uploads/2019/01/NNPCF-2018-Annual-Report-Med.pdf>

In addition, independent, third party reviews of the work of parent carer forums provide evidence of their positive impact:

- Local Area Inspections conducted by Ofsted and the Care Quality Commission frequently highlight the value of parent carer forums. Some examples from the 2017-18 financial year include Wiltshire, Sutton, Wakefield, Hackney, Bedford, Rutland and West Sussex.
- A recent report by ISOS for the Local Government Association highlighted the importance of working with parent carer forums in delivering sustainable services. <https://www.local.gov.uk/developing-and-sustaining-effective-local-send-system-practical-guide-councils-and-partners>

8 Has the Department established effective mechanisms for parents and young people to understand their rights and seek redress when their rights are not being met, and removed barriers to them doing so?

Well informed parents are able to access resources from a range of sources to inform their decision making. However, the most vulnerable families need further support.

The local offer is one source of such support but Parents need help over and above the local offer. Parents tend to rely on face to face support from local experts that they trust. These local experts may be other parents, parent carer forums, local authority staff, SENDIAS staff or local charity workers. The key for parents is the ability to have a conversation and ask questions.

The SEND code of practice makes provision for key working schemes. Very few local areas have adopted this practice – this is what the most vulnerable families with SEND need. In addition, IASP services and the National SEND helpline hosted by Contact need continued support and additional resources.



National Network of Parent Carer Forums

'Our Strength Is Our Shared Experience'

The current national trial for single route of redress is an important positive development. However, it does not go far enough. Currently complaints about health or social care services can only be heard if there is an education concern and the tribunal can currently only make non-binding recommendations against health and social care services. It is vital that the accountability for service delivery is able to reflect and mandate the joined up working and approach that lies at the heart of the SEND code of practice.