

**APPENDIX I****SEND DESIGNATION AND CAPACITY CONSULTATION  
RESPONSE ANALYSIS (OCTOBER 2018)****Background**

The current designation categories for our special schools do not reflect the language of the Special Educational Needs and Disability Code Practice: 0-25 years (2015), nor do they reflect how understanding about the needs of young people has developed.

As a result, there is a need within our strategic planning to restate the purpose of our special schools for future years. This will recognise our ongoing commitment to promote positive inclusion within mainstream school provision for children and young people with SEND, balanced with the evidence that complexity of need for some children and young people has increased significantly.

Therefore, it is proposed that the designation of all special schools is changed to 'complex needs'. In addition to this, each school is described through a general and a specific criteria. Each of the specific criteria reflects the current designation of each special school.

**General criteria for entry into a special school:**

1. All pupils will have an Education Health and Care plan (EHCP). They will require consistent personalised learning support programmes every day of the week all year round in order to achieve their potential.
2. It is demonstrated that pupils will benefit from a small classes and a peer group, to support both learning and social and emotional development in a nurturing environment.
3. Parents have expressed a preference for the school.
4. The school is suitable to the child's age, ability, aptitude and special educational needs.
5. Admission to the school is not incompatible with the efficient education and efficient use of resources.

**Methodology:**

A consultation was undertaken in order to understand whether stakeholders were supportive of the plan (questionnaire can be found at the end of this document). The consultation also provided an opportunity for stakeholders to comment so that their views could be taken into consideration and/or acted upon. Consultation documents were published on the City Council website and further meetings were arranged with special school governing bodies; in addition to this, the families of pupils attending special schools were invited to an information meeting.

The consultation period spanned 17<sup>th</sup> September to 19<sup>th</sup> October 2018. There were 152 responses and the following individuals and organisations were consulted:

- Schools involved in special school redesignation consultation, Head Teachers, staff, governors, parents and pupils including the ACE MAT CEO
- All other schools including multi academy trust CEOs
- Local residents (via schools)
- Local pre-schools and nurseries
- Church Diocesan Boards of Education

- All City Councillors
- Plymouth Members of Parliament
- Health Agencies
- Police
- All Children First - Plymouth Early Years Development and Childcare Partnership
- System Design Group
- Plymouth Association of Primary Heads (PAPH)
- Plymouth Learning Trust (PLT)
- Special School Heads in Plymouth (SHAP)
- Plymouth Association of Governors (PAG)
- Plymouth Learning Partnership (PLP)
- Local Authorities that maintain a child with a Statement at any of the schools
- Trade Unions
- Further and Higher Education Institutions
- Plymouth Parent Carer Voice
- Youth Ascends

### **Analysis of responses:**

Overall the support for the general principles of re-designation, as outlined in the proposal, was strong. Respondents broadly agreed with the change of designation to “complex needs”, with specific criteria for each school. The feedback indicated that structuring descriptions in this way would:

- provide greater clarity for families
- emphasise the high level of complexity that can be catered for in the city’s special schools
- clarify the role of mainstream schools

*“The proposals will ensure that there is a good overlap between the special schools to ensure that the vast majority of the children in the city can be catered for within Plymouth”.*

With regard to the first point, providing greater clarity for families was a consistent theme in managing expectations, reducing anxiety and providing accurate and helpful information to families so that they could make the best choice for their child.

81 (70%) responses supported the proposals.

Although the majority of responses were positive regarding the re-designation, the following questions were raised.

- Will a possible increase in special school pupil numbers be matched in funding and investment in the school?
- Will there be any impact on current pupils?
- Will children with certain disabilities have to travel further to the appropriate school?

- What will be the rigidity of rules when considering applications for specialist placement where a child's primary need does not match the school's designation?
- Will staff have appropriate CPD? Will teachers' receive appropriate training in line with the designations?

The following concerns were also noted:

- If special school places are restricted to children with a diagnosis, rather than identified needs; will pressure for children to be formally assessed and diagnosed increase?
- The needs of ASC and SEMH must remain a priority for increased capacity in the city.
- There is no vision to create a provision for children with additional needs aged 2 to 6 years to enable a holistic assessment of their needs. Early years assessment centres, co-located in mainstream provisions, would enable successful transition into appropriate provision.
- All elements of pupil' EHCP need to be properly considered, costed and funded to ensure complex needs are effectively met.

However, there were concerns about the specific criteria proposed for each school. These concerns were around grouping children by the level of learning need that they have:

- Each child that attends a special school does not have just one need, needs are more complex than just one designation and this needs to be considered.
- A designation based on a child's level of learning is unhelpful.
- Cognition and learning should not be the primary need for every pupil (with reference to the specific criteria of one school).

Specific criteria for admission, especially the term "primary need" prompted debate. This focussed mainly on the use of "cognition and learning" rather than "communication and interaction" as the primary area of need. There were similar comments from both those who agreed and disagreed:

- The description does not fit the pupils in our school
- The description does not fit the school or represent the needs of the children at school.
- Cognition and learning is not the first area of need.
- Our pupils are complex and all areas of need are as important as each other.
- The word "primary" should be removed from "as the primary need", it should say "as a need".

Additionally, there were a number of other comments relating to specific schools:

- Wording should be changed to 'some students will be working at the standard of national curriculum'.
- Some pupils will not be able to follow a subject specific curriculum, they will need an engagement style curriculum.
- Pupils arrive working significantly below age related expectations due to a variety of factors.

The link between the specific criteria and information in EHCPs caused further comment, particularly from those who did not agree with the proposal.

- Until EHCPs and the 1-4 system is reviewed, there is no benefit for young people or parents.
- EHCPs are inadequate and do not reflect the more complex needs of students
- EHCPs are not fit for purpose and do not give a true reflection of the extent of some of the student's needs. The ranking 1-4 is essentially saying that one need is greater than the other.
- Re-designate after EHCPs have been reviewed.

## Post 16 specialist capacity:

50 respondents who supported the re-designation proposal also commented on the development of post 16 provision. However, the responses indicated a preference for a mixed economy of provision. A 'college style' provision for post 16 students raised some concerns, particularly when it was considered that a student was not yet ready emotionally to take that next step.

Concern was also raised about the pastoral care and tailored education needed for students in a college situation – was this possible to provide? Responses suggested that post 16 provision in mainstream settings may not suit all students, particularly as the challenges that some students present can become more acute through a period of transition.

Respondents who supported the proposal felt that there needed to be 6<sup>th</sup> form provision at the special school attended by their son or daughter. This was so that there was an alternative for those unable to access college or cope with a further transition.

Respondents who did not support the re-designation proposals, but who supported the development of post 16 provision (21/45) also raised similar concerns around students coping with bigger groups and bigger buildings in a college environment. In particular, these factors were seen as having a negative impact on a successful transition. Also there were concerns that a college environment may not offer a 5 day week to students who need continuity. Many also highlighted a disparity across special school post 16 provision, with some schools offering 5 day post-16 provision and others not.

One response suggested a hub model: *“If a hub for 16-25 young people with complex needs was created, parents may develop the confidence to move their children on at 16 rather than at 19, creating further special school capacity”*.

Respondents who did not support the re-designation proposals also suggested that a consultation on post 16 provision, including options for those who do not want a college offer, was more important than the re-designation.

It is clear from the feedback that the suggested “college” model needs to be clearly described in detail in any further consultation to address the anxieties of parents, carers and special school staff.

## Maintained special schools – review of buildings

Few respondents commented on this section of the consultation, however, those that did focussed on health and safety and investment in the development of suitable environments.

## General comments

As with all consultations, views and comments outside of the specific questions were received. We value all feedback from schools and the wider community and these have been summarised below alongside the comments of those who were undecided.

- Unsure what the real impact will be.
- Will those who do not meet the new criteria be pushed into mainstream?
- EHCPs do not reflect the needs of our students.
- As complex needs increase it is more difficult to put students into suggested designations.
- If a child has complex needs, how do you justify prioritising one area of need over another in an EHCP?
- If you base entry into special schools on the primary area of need, surely you will end up with heavily oversubscribed schools?

- How will this impact on staff, will they be expected to move to a school where their skills align more with the specific criteria?
- Children with very complex needs have differing needs throughout the day and are far too complex to fit into boxes.
- Words are important and labels stick.
- How will this promote inclusion and support special schools who work with mainstream schools?

The majority of those who stated they were undecided about the proposals (14/16) raised their concerns around post 16 provision. These concerns echoed those who agreed and disagreed with the proposal.

## Summary

There was agreement that there is a need for re-designation and that the term complex needs is appropriate.

Regarding the specific criteria, responses clearly indicated that the linking of “primary need” with the content of an EHCP was a concern.

Deeper analysis revealed that the inclusion of the term ‘primary need of cognition and learning’ in the specific criteria of special schools was considered inappropriate.

The ranking of needs in priority order on EHCPs raised a great deal of debate, much of which considered the approach unhelpful. In particular the naming of a ‘primary need’ was felt to be unhelpful.

Post 16 provision provoked a strong response. Respondents were clear that they felt current provision is inadequate, that a review is needed, and that not all students are ready to leave special schools without sixth form provisions for a college environment. The pending post 16 consultation will need to be specific and detailed.

## Next steps

- There is an in-principle agreement for the re-designation.
- “Complex needs” is an accepted term.
- The proposed specific criteria for each special school requires some re-wording.
- The post 16 provision consultation must try to address the issues raised.

# SEND REVIEW:

Re - designation and Capacity Questionnaire

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Please complete and return this questionnaire to Children’s Services (ref. AP) Completed questionnaires can be emailed to [schoolorganisation@plymouth.gov.uk](mailto:schoolorganisation@plymouth.gov.uk) by **Friday 19 October 2018**. Or alternatively posted to Children’s Services (ref. AP) Plymouth City Council, Plymouth PL6 5UF.

Name: .....

Address: .....

.....

Telephone number: .....

Email address: .....

Please tick (✓) the relevant boxes below to indicate the categories that best describe you:

- Governor at a Plymouth Special School
- Teacher at a Plymouth Special School
- Support Staff Member at a Plymouth Special School
- Parent or Carer of pupil at a Plymouth Special School
- Pupil at a Plymouth Special School
- Local resident
- Organisation (please name the organisation you represent):   
.....
- Other category (please specify):  
.....

(see over)

Having considered the proposals to redesignate Plymouth Special Schools including any capacity changes, as set out in the attached letter, please tick (✓) **one box only** below to indicate whether, on balance, you support the proposal.

- I support the proposals**
- I am undecided about the proposals**
- I do not support the proposals**

What are your reasons? Do you have any other comments to make? (please use the space below).

Please note that the information provided on this form will be used to help Plymouth City Council decide what further actions to take, if any, with regard to redesignating the Plymouth Special Schools.