In order to prepare a comprehensive approach to our response to the green paper, the City of London held an all-day event with key partners across, education (including representatives from schools outside the local area which are attended by City of London children and young people with EHC plans), health, social care (children's and adult's) representatives from the City Parent Carer Forum, SENDIASS, commissioning, policy, and the homeless services. The response to the consultation represents the views of partners across these areas. 30 people participated in the event.

List of consultation questions and responses/ideas

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 the standards apply across education, health, and care in a 0-25 system.

The majority of children and young people in the City of London attend schools outside of the City local area as there is only one maintained primary school, no maintained secondary schools, special schools or alternative provision. The City of London, therefore, welcomes the proposal for standards on how needs are identified and met across education, health and care, the appropriate provision which should be made available, the process for accessing and reviewing support, the process for co-production, and standards for transitions which should be consistent which will give greater clarity for families, universally what they can expect, and from who, therefore transparency across all areas, including understanding of thresholds, achieving uniformity but recognising local differences. Whilst the City of London welcomes the proposal of national standards, the current legislation and guidance is clear but, it appears, not always followed. Therefore, the City of London questioned how the national standards would be monitored, measured, and moderated.

Some of the ideas and questions around this process:
- Ensure that these standards are age appropriate and contextualised locally
- There needs to be a minimum standard for communication across the stakeholders
- Challenge on how to bring the health, education and care standards framework together to address the individual needs of the children and young people.
- How will Academies be held to account for these standards?
- There will be common and specific training needs across education, health and social care and training for the early years will be of paramount importance.
- There needs to be a mechanism for parents and families to feedback and have their voices heard on a regular basis.
- Identify what progress means for individual children and young people – how can you expect that every child to meet a standard when every child is different and how do you measure these outcomes. These outcomes to be focused on life skills and PfA.

- We need to consider the role of SENDIASS and those that offer independent advice, support, and advocacy in this process.
- How will the national standards fit in with the Children and Families Act? The law around SEND is very clear.

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?

With only one maintained primary school, no secondary schools, special schools or FE provision, the City will have to consider what local means and how partnerships are developed outside of the City boundaries.

The following will need to be considered:

- Develop the current good practice which is in place –The City currently has a SEND Programme Board. This has a strategic overview function. The representatives are from Education (including the one maintained school), Health, Social Care and the City Parent Carer Forum, Commissioning, SENDIASS and other City support services such as data & performance, policy & Strategy.
- Ensure that meaningful engagement and participation in coproduction takes place to avoid tokenism
- A requirement for all SEND Partnerships to include parent carer and young person representatives and have ways and means of ensuring their participation.
- Need to consider the Joint Strategic Needs Assessment (JSNA) and how this informs commissioning. The City is a small local area and health data is not always disaggregated and available for the City local area.
- Subgroups to the SEND Programme Board are established as task and finish groups to develop operational/practical approach to developing specific areas of work. A recent example is our work on transitions.
- Mapping exercise led by commissioners – for the provision of services that are practical and realistic opportunities for children and young people with SEND. Analysis of gaps in provision also required, so JSNA and local data is essential.
- Training for all, including commissioners regarding their role in SEND delivery
- Have a nationally centralised documentation system and portal for all LAs, external agencies, schools, and colleges to use.
- How to improve/develop communication systems between partners, some of which will be outside of the local area

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

This is something we have to do regularly in the City due to the size of our local area. It is a resource demanding process on staff and the costs of placements. The following would be worth considering. The LA and partners would like to make the following general comments:

- Regional brokerage systems and commission partnerships to create better purchasing power
- Cooperative working between LA's/MAT's and joint mapping exercises involving all parties
- Consistency across the proposed academies trust in their provision to support children and young people with high-cost needs
- Regional "register" of provision – kept live
- Increase capacity in the maintained sector
- National standards - Commissioning in the same way across boroughs to gain consistency
- Clear information for parents on what is available
- Post 16 and employer representation on local authority panels where appropriate
- Standardisation of funding - funding bands
- To have sixth form and college representation on decision panels
- Work with our FE sector colleagues on training staff, developing supported internships etc

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

The LA and partners consider that the sections in the EHC plan remain appropriate and that these work well, except for section H1 and H2 regarding social care provision which perhaps could be merged and with better clarification of what a high quality social care input to the plan looks like.

Section F – broader than the name and type of school – should include more details on the breadth of provision.

How will the standardised form be developed? Will parents and carers be part of this? A strength of the current arrangement is the flexibility to personalise these.

The City of London currently uses a person-centred planning tool to develop plans and at key transition stages which is very effective. We would like to retain this approach and have some flexibility to be able to include approaches such as this in the future.

The LA and partners would like to make the following general comments:

- There should be a requirement in terms of the length of the EHC plans – information must be succinct/length of the EHC plan to be managed.
- A guide for parents and carer and young people on the EHCP and how they should use the information.
- Training/guidance for parents and professionals on the new system
- Easy read/visual version would be helpful - also additional languages
- Clear indication of when it's being reviewed or updated

- Specialist plan writers in every local authority/training for EHC plan writers
- National system for hosting EHC/who will be responsible for the system. Health and social care have different systems – how will it fit onto one system
- Will it include a resource allocation system to fit into the proposal for banding and regional commissioning?
- Are there any proposals for a standardised annual review form?
- Need to ensure that digitised system is accessible to all

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?

 The LA and partners would like to make the following general comments:

- Complex area – differing views amongst the participants
- Will parents feel they can fully contribute to the list? (Power balance/imbalance)
- Hold meetings to listen to the voice of parents or the students themselves if they are older and their concerns, take advice from advocating charities, carry out research questionnaires
- Need to consider families personal reviews of provision – it is not all about inspection outcomes
- Professionals and parents have different views on the quality of placements
- Clear information on the quality/What is on offer for each provision
- Partnering with parents as experts of child's needs
- Shared understanding with parents on their child's progress and what progress means for each individual child
- Child centred and everyone working together in the child's interests
- Focus on the content of the provision, "what do we need to provide"
- Have an established relationship with parents managing expectations
- How to include the voice of young person – post 16 – sometimes different to parents
- Listen to young person even when in conflict with parents
- Is this duplicating the local offer?
- Rename the local offer
- A central and accessible directory for parents/partners/students that providers would regularly update
- Accountability to keep it updated – there needs to be resource attached to this
- Improve transition process
- Pan London family information 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, Agree, Neither Agree nor Disagree, Disagree, Strongly Disagree
− If you selected Disagree or Strongly Disagree, please tell us why, specifying the components you disagree with and alternatives or exceptions, particularly to mandatory mediation.

Agree

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.

Difficult question to answer as not clear what the remedies are. These remedies can include training of school staff and ordering a change to school policies.

We have not had a SEND Tribunal case where a disabled child has been discriminated against by a school.

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?

This should be an integrated process and is a critical and essential early preventative approach.

 The LA and partners would like to make the following general comments:

- Have annual health checks from the moment children are diagnosed. Should not start at age 14 and also should include neurodivergent communities.
- A coherent and centralised assessment system where all agents involved have one reporting portal. This includes the education sector, the NHS and social services.
- There needs to be effective data sharing agreements between Health and Education to facilitate this process
- There should be additional funding in the EY DSG to set up a statutory early years' inclusion fund pot for 2-year-old to align with the statutory duty to provide this for 3- & 4-year-olds
- There should be additional EY DSG funding to include funding to cover additional cost of qualified SEND practitioner.
- There needs to be an expansion of the 2-year-old free early education criteria to include children known to/or referred to Specialist Services, who do not have an EHCP so that they can regularly attend an early years setting EYFS curriculum (for 15 hours per week).

9. To what extent do you agree or disagree that we should introduce a new mandatory SENCo NPQ to replace the NASENCo? Strongly Agree, Agree, Neither Agree or Disagree, Disagree, Strongly Disagree
− If you selected Disagree or Strongly Disagree, please tell us why. Schools, SENDCO Network

Agree

- But what will this achieve?
- How will this address the lack of staff already?
- What is wrong with current training?

10. To what extent do you agree 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, Agree, Neither Agree nor Disagree, Disagree, Strongly Disagree

− If you selected Disagree or Strongly Disagree, please tell us why Schools, SENDCO Network

Agree but we need to add the following comments:

- Will this make hiring new staff more difficult?
- Should we add 'or willing to complete the training'?
- There should also be a mandatory requirement for practitioner in Ofsted registered setting to hold a SEND qualification (at least Level 3 SENCO qualification).

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. Strongly Agree, Agree, Neither Agree nor Disagree, Disagree, Strongly Disagree − If you selected Disagree or Strongly Disagree, please tell us why Schools, SENDCO Network, City of London Academies Trust

The LA and partners would like to make the following general comments:

While some partners neither agreed or disagreed with this statement, some disagreed and made the following comments:

- MATs encourage profit led education
- Will specialist provision be less of a priority for MATs?
- LAs already doing a better job than private academies
- I don't agree with handing responsibility of SEN provision to MATs

- MATs have too much power and too often invested in one person (CEO) whose personal view/ethos is to control the future of a hugely diverse range of pupils needs. It is impossible to create an inclusive culture in this way.

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?

The LA and partners would like to make the following general comments:

	Employers	Providers	Government
Access	Ensure onboarding processes include assessments of need from relevant specialists and other departments within the business such as Human Resources and Occupational Health. Advertise openly what is available for learners with SEND. Offer information in a variety of formats. Offering employment so young people with special educational needs are seen as succeeding in local jobs Local authorities need to work closely with employers Offering work placements and work experiences in City institutions Training for staff around inclusion, equity, SEND/equality laws and regulations	Regular review programme of courses to ensure delivery meets local demand. Clear pathways for children and young people with SEND. Audit courses to produce an accurate assessment of what is on offer for SEND learners i.e. teaching, facilities, resources, wider support, progression etc. Improve early and accurate identification of needs by screening for neurodiversity on arrival. Improve understanding of Neurodiversity and tackle unconscious bias. Be more proactive in offering assisted apprenticeships. Have in place a robust transition programme that begins before a	Improve transition at further education by introducing common transfer files, adjustment passports that include information on exam access arrangements. Apprenticeships that are more accessible to young people with special educational needs (entry requirements are high). More apprenticeships or preserving some for young people with SEND The government should give incentives to employers who should also receive training on SEND Funding for supported internships Setting up a national framework (offer), that businesses can tap into National campaign for post 16 opportunities/ National drive – big delivery plan National standard to further embed around preparing for adulthood from the earliest years. Financial incentives to employers Develop ways of engaging more local employers in the process

		learner finishes their previous course and includes a transition onwards post-course completion. More training around inclusion, equity, SEND/equality laws and regulations	Need to invest in creating more opportunities, including volunteering opportunities for young people with SEND.
Participate in	Manage expectations of both employee and line manager by encouraging an initial meeting where regular work tasks are explored in terms of what the learner feels able to do, what they require help with and the source of the support for this. Consider what further training and awareness is required by the department to ensure learner is supported by all colleagues. Develop a consent form that allows learners to agree what information will be shared, with whom and by whom regarding their needs. Build a network of specialists that can be tapped into for advice and guidance regarding a range of SEND needs.	Ensure all mainstream tutors complete initial training in teaching learners with SEN. Ensure all tutors access regular CPD following the initial training. Agree provision with learner and build in regular review points to accommodate any changes in their needs. Explaining more clearly what opportunities are available by assessing apprenticeships Better careers advice Mentoring support	Make available funding that accurately covers the costs of providing for learners' needs.
Be supported to achieve	Carefully manage learner growth – introduce regular line manager and learner meetings to ensure challenge increases when the learner is ready. Employers could offer learners more flexibility in their time use as	Adopt a holistic approach – build into the curriculum and daily delivery opportunities to develop a learner's social and emotional understanding, help learners grow in confidence, social communication and	Build expertise and leadership by extending national professional qualification (NPQ) for SENCos not in adult education settings, with a focus on ensuring high quality support provision for education and the workplace.

	learners may need to attend extra support sessions, meetings and medical appointments during the week.	social interaction skills.	

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, Agree, Neither Agree nor Disagree, Disagree, Strongly Disagree − If you selected Disagree or Strongly Disagree, please tell us why

Agree

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?

The LA and partners would like to make the following general comments:

- Consider how the 6K to schools is allocated – could some of this be allocated to spend on AP's?
- Clear guidance on how the 6k to schools should be spent
- AP To be properly funded to deliver this vision plan, but schools should have the funding to retain and support pupils, so they do not need to go to AP's. An inclusive approach to universal education.
- Ensure quality first teaching and SEN support is in AP
- More mainstream capacity/special units -More inclusive schools – need to keep children and young people in mainstream schools
- Provide more specific funding for SEMH
- More money in mainstream schools to avoid alternative placement – this needs to be accounted for and monitored
- National standards for mainstream schools and reasonable adjustments to ensure that there is quality provision and that it is equitable

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, Agree, Neither Agree nor Disagree, Disagree, Strongly Disagree − If you selected Disagree or Strongly Disagree, please tell us why

Agree

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, Agree, Neither Agree nor Disagree, Disagree, Strongly Disagree − If you selected Disagree or Strongly Disagree, please tell us why

Agree with the following comments

- Quality of oversight will depend on the framework

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

The LA and partners would like to make the following general comments:

- Types and number of exclusions from schools – selected because will show successful inclusion
- Numbers of children in a particular MAT's AP
- Number of children returning from AP to mainstream
- Rate of progression of SEN pupils – success of strategies
- Outcome star – distance travelled
- Case studies – thematic education
- Health diagnostic rates – ASD, ADHD, DLD
- Number of EHC plans
- EHC outcomes – consistent between LA's
- Measuring child, parent, staff views and alignment
- Qualitative - Case studies, voice of young person, voice of parent/carer
- Achievement data; case studies on social and emotional development
- Value for money on costs of services and provision

18. How can we best develop a national framework for funding bands and tariffs to achieve our objectives and mitigate unintended consequences and risks?
The LA and partners would like to make the following general comments:

- The funding formulae must be regional, not national as this will not work. This would need to assimilate with the school national funding formula and the Early Years funding formula
- National standards that are monitored and moderated are required to make sure that there is consistency
- Best value for money – must be a golden thread throughout and how do we measure this? This will include financial, human and physical resources
- There needs to be recognition of other funding routes coming into schools and LAs

- There will be specific inner city and rural areas that will have bespoke needs including the local cost of living
- We need to share best practice and not re-invent the wheel
- The funding formula needs to reflect the age and developmental stage of the CYP and their needs
- The cost of transport must be a factor for consideration
- Consult those working on the chalk face

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

The LA and partners would like to make the following general comments:

- What is the governance of this board?
- How representative is it?
- Is it proportionate/supportive/punitive?
- Should reflect local governance arrangements
- Effective communication between partners
- Ringfenced money with accountability checks
- Children and parents will need understanding of what this board is and how they can contribute to it
- Please don't hang inspections over Heads of local partnerships
- Is this really a consultation?
- Communicate effectively, carry out surveys and hold consultation meetings

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?

The LA and partners would like to make the following general comments:

Barriers
- Not listening to the outcome of the consultation
- Inconsistencies
- Lack of confidence in the process
- Not enough funds to undertake the reforms
- Jargon – inaccessible to parents
- Communication between health, education and social care not effective
- Not enough understanding between and across all parties
- Lack of centralisation and guidance on all aspects of these reforms

Enablers
- Inclusive practice in place at early stages
- More inclusive schools
- Better funding for parent carer forums
- Building trust – building understanding
- Tackling unconscious bias
- Shift in culture – understanding and acknowledging the issues

- White Paper – need to see the links and consistency between the two papers
- Less need for EHCP's and AP
- Banding system will stop outpricing and OA placements in the long run
- Learning from mistakes of the 2014 reforms
- Project managers for all LA's to embed
- Resources to be transparent and targeted

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

 The LA and partners would like to make the following general comments:

- Better and centralised communication and documentation repositories
- Training to support the new system
- Clear guidance/Code of practice
- Clarity of commissioning responsibilities
- Clear parameters
- Training and support for parents and carers
- Recognition of parent carer input - take parents/carer with you
- Consistent standards for co-production
- Additional targeted resources
- Transformation process – keep what is working

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

 The LA and partners would like to make the following general comments:

- A big document – overwhelming for parents and carers and not easy for
- families to navigate and the questions are sometimes very difficult to understand
- Too much jargon and what do you do if English is an additional language
- It pays lip service to early years
- Proposals to fix a broken system – national AP framework will not fix it
- Only says 'inclusion' once in questions!
- 2014 was about inclusion
- 'What do we mean by inclusive schools?'
- There is a view that academies focus on academic achievement rather than inclusion. How will this be addressed?
- The governments vision as set out in the White Paper for 90% of primary school children to achieve the expected standard in Key Stage 2 reading, writing
- and maths by 2030 – concern that this is an unrealistic target which will lead to schools not wanting to accept children with SEND
- "Narrow understanding of what it means to be human" – a quote from one of the schools that resonated
- There is a view that academies focus on academic achievement rather than inclusion. How will this be addressed?

- The governments vision as set out in the White Paper for 90% of primary school children to achieve the expected standard in Key Stage 2 reading, writing and maths by 2030 – concern that this is an unrealistic target which will lead to schools not wanting to accept children with SEND
- 'What's gone wrong' should be the focus
- Funding isn't there
- Banding is about suppressing budget increases
- Emphasis is on alternative provision – worry about funding
- Need to mediate is beneficial
- Improve communication between different departments within a LA e.g., funding and case workers, SEND and social services
- Even though the consultation mentions that "high quality early years provision for children significantly decreased the likelihood of a child being identified with SEND later", there is a current push by the government to increase adult- child ratio (to attempt to reduce childcare cost). This goes against improving quality, particularly for children with SEND who need additional support and for targeted intervention.
- The SEND Code of Practice should be aligned to the Early Education and Childcare Statutory guidance for local authorities which states that local authorities are required (i.e., must) secure information, advice and training for providers in meeting the needs of children with special educational needs and disabilities, vulnerable and disadvantaged children. This reinforces the point made in question 8 about all SENCOs in early years settings needing to be qualified for their role.
- Workforce development – consideration of a recognised qualification for SEND Caseworkers
- How are LAs going to be held account to deliver the outcomes of the Green Paper?
- A barrier to successful meeting of needs and inclusion is the structural separation of "behaviour" policies, SEND provision, and "wellbeing"/pastoral care policies within school structures. Policies and practices for each need to be integrated and mindful of the interactions. Poor behaviour may reflect inadequate SEND identification and provision, and life stressors (e.g., ACE's for children AND parents) which need to be considered together, not in silos dictated by traditional within-school and with partner service structures. Clinical experience suggests this is a frequent factor in exclusions and poor engagement with educational opportunities.
- Given the huge increase in demand for neurodiversity support, it is unrealistic to expect timely diagnosis with current health investment and workforce challenges. Support must be based on assessment of need if it is to be provided in a timely fashion. Information collected from this needs assessment and timely provision will speed up later diagnosis if warranted, release funds for health interventions, and thereby improve health, mental health, social and educational outcomes.

Biggest Challenges:
- With most City of London children and young people attending schools outside of the City, the City is not able to access data in terms of those on SEN support. The DfE needs to provide pupil level data on where City

children who are on SEN support attend school – currently City children attend over 80 schools in other LA's

- There should be a mandatory requirement for schools to share SEND data with home LA's
- Shared understanding of how data is used
- Parents better informed from the beginning and giving consent early for data sharing
- Data sharing agreements between LA's and across health
- A consistently available dataset
- A central database that is used by education, health and social care (made a requirement to keep up to date)
- SEND CoP is very blue-sky thinking – system not well equipped to cope with the demands of expectations the code brings
- Make data sharing a statutory requirement across agencies and partners
- Be clear what difference access to data would make? What would the local system look like if access worked perfectly
- Then, present this to City of London governance and move it into place-based partnership and then NEL
  Access to services – Long waiting lists for services such as CAMHS and delays in diagnosis
- Exclusions from academies
- Tribunals 95% against LA's - not fit for purpose and should be reviewed as this is really complicating the role of LAs in holding schools to account
- NQT's expected to be responsible for 30 pupils including SEN pupils with little support. Need for more resources and training for NQT's in mainstream schools
- Not enough SEN funding
- Lack of funding for the parent/carer voice and various groups
- Not enough local health provision
- Too many EHC assessments so time diverted from support and early intervention
- Lack of disabled people in employment
- Not much going on in terms of job opportunities
- Available places in special schools and AP when we need them