SEND STRATEGY 2022-27

Oxford City Council response:

Oxfordshire County Council consultations –
Local Area Special Educational Needs and Disability (SEND)
Draft Strategy 2022-2027 and System Reform for SEND

Oxford City Council welcomes the opportunity to comment on the two strategy documents published by Oxfordshire County Council on Special Educational Needs and Disability covering the vision for provision and proposals for system reform. In particular it is welcome that the strategies were co-produced with organisations that work with children and young people. It is also welcome that governance has been provided through the Health & Wellbeing Board and SEND Strategic Partnership Board.

While overall education standards in Oxfordshire show an improving trend, notwithstanding the more recent impact of the COVID-19 pandemic which has set education back for most children, the data shows our county has consistently underperformed in terms of the outcomes achieved for SEND children across all age groups relative to peer authorities and the England average. This underperformance is all the more visible given Oxfordshire children *without* SEN do better at all ages than the England average. Therefore, while the lack of central Government funds into the education system is clearly a real problem exacerbated by a sustained rise in the number of pupils identified with SEND, these are England-wide issues and so they cannot account for Oxfordshire's underperformance.

The reasons for change will be recognisable to parents of SEND children and others familiar with the system in Oxfordshire:

- Insufficient clarity (and transparency) about what support is available
- Lack of confidence in the among parents in the existing support available
- Longstanding issues around poor attendance among SEND children
- Insufficient capacity within local specialist education provision, leading to the use of independent non-maintained special schools

The proposals 1-6 that have been set out for system reform offer some positive changes the way in which SEND pupils are identified, assessed and supported within the education system and more widely. These should help deliver improved outcomes for individual children and for the SEND group of children as a whole. Other than proposal 5 – which would place an unenviable burden on local schools for decision-making about which school gets additional funding, all of these should be taken forwards. However, the proposals do raise a number of questions, set out in the response below, which should be considered.

Overall, the effectiveness of the proposed system changes is inevitably going to be linked to the level of additional resource that can be provided to support the measures.

Oxford City Council notes that another parallel area of educational underperformance in Oxfordshire is in relation to disadvantaged pupils, including those in receipt of Free School Meals (FSM). Moreover, the 'attainment gap' for disadvantaged children is known to have widened during the pandemic as a result of the lack of teaching contact time - exacerbated among disadvantaged households by a lack of digital enablement to access learning online and sometime chaotic home environments. It is hoped that Oxfordshire County will soon bring forward proposals for closing this attainment gap.

Critical to the development of this Strategy will be ensuring that co-responsibility across agencies is built into the implementation process leading to co-production with all stakeholders, including families.

Oxfordshire Local Area Special Educational Needs and Disability (SEND) Draft Strategy 2022-2027

The Local Area SEND Draft Strategy's four priority areas are all supported, and it is hoped these underpin the existing approach to delivery of SEND education:

- High-quality provision and excellent outcomes
- Enabling children to access to opportunities
- Provision of timely and equitable access to services
- Ensuring seamless and effective transition into, through and beyond education

What is perhaps particularly notable is that the commitments in the draft strategy apply across education, health and social care – and it is this interlinkage of services that strengthens the approach.

Vision and Strategic objectives
Oxford City Council also supports the vision and strategic objectives set out - in particular the focus on promoting earlier identification of need, help and provision; ensuring effective transitions to fulfilling adulthood; and a fairer and more transparent system. However, the vision that families should be at the centre of decision-making ought to be today's reality – as this is a legal requirement

The Council supports the view of the Oxfordshire Strategic Schools Partnership (OSSP) that the draft Strategy represents more a *sharpening* of the existing approach that a wholesale change in the approach to SEND delivery – with an important emphasis on better collaboration and putting children at the centre of decision-making.

The objectives of earlier engagement with families, bringing more provision back into Oxfordshire, and sharing the responsibility among a much wider group of providers including health/social care etc. are all welcome.

It will be important to reappraise the draft Strategy once the central Government's SEND review – which is understood to be imminent - is published.

Consultation on Oxfordshire County Council System Reform for Special Educational Needs and Disabilities (SEND)

The System Reform proposals consultation sets out a number of specific measures that, while not increasing the overall scale of funding for education – including SEND education – should nonetheless help ensure the existing funds are more fairly allocated, level up the skills needed to provide support for SEND children and create a more locally-shaped system better meet individual children's needs

1) Reform of Top-Up funding arrangements for children and young people with an EHC Plan

Oxford City Council agrees with the collective view of the report writers that funding is insufficient to meet the SEND requirements of the local area, particularly in Oxford, and that the available funding must be wisely and effectively applied. We support Oxfordshire County Council's lobby to Government for additional funding. The overall level of Government funding for SEND is wholly insufficient and Oxfordshire lags many other authorities in its High Needs Block resource allocation.

Within Oxfordshire, reform of the High Needs Block top-up funding arrangements into mainstream schools for children with Education and Health Care Plans (EHCPs) is welcome as this has always been opaque and inconsistent. It is noted that some OSSP heads believe underfunding in this area is causing the exodus of SEND children to independent schools. Equally is important to ensure that more funds lead to better outcomes, rather than more money delivering the same underperformance. There is a need for serious investment in provision in mainstream sector

The proposals are for the funding to follow the child which is consistent with the national guidance around SEND.

2) Resource Bases as a core part of the range of provision
Increasing the number of specialist resource bases attached to mainstream that offer support to SEND children feels like the right thing to do. However, the report hasn't provided clear evidence that small resource bases will meet need better and more cost effectively than if that funding was instead spent on additional special school places. It would be helpful to understand the views of head teachers of the nine schools that currently have resource bases attached to them.

Utilisation of additional space in empty buildings makes good sense and enables locally provided solutions. The report does acknowledge the conversion of existing empty classrooms for this purpose will have some significant capital costs. It is essential that this funding is made available to ensure the right environments and adaptations are provided. Head Teachers of those schools to receive resource bases will also need to be upskilled and there will be a requirement for more specially trained professional staff to work in them. This to presents a challenge that shouldn't be underestimated as both special schools and existing resource bases are already struggling to recruit staff.

The proposal to transfer management of the resource bases from the Local Education Authority to the schools to which they are attached is very welcome. A single line of accountability will reduce the ping-pong some parents of SEND children experience between the school and resource base over who is responsible. We don't want to create special schools within mainstream schools and this should help

ensure resource base staff – and teaching - are better integrated into the structure of mainstream schools.

It also supports the principle that mainstream schools should be more inclusive and be able to meet the needs of SEND pupils including those with high needs. But this is also a question of funding, training, expertise, ethos – and it may require increased access to support specialists and closer partnering with special schools.

It would be helpful to have a clear concept of what a resource base means, what it does etc, and what Professional Development is going to be offered to staff there to support them.

3) Sufficiency of specialist day placements in Oxfordshire
There has been under provision of special school places in Oxfordshire for years and too many SEND children having to travel too far for their schooling. The issue has been exacerbated by central Government's prioritisation on building more free schools over investing in expanding capacity in existing special schools. Therefore the proposal for two new special schools in Bloxham Grove and in southern Oxfordshire is very welcome.

Also welcome is the objective to provide for all of the needs locally though it is questionable if this can be achieved within the existing funding envelope. Nevertheless, the cost of sending children to independent schools out of county is very high and so diverting those funds into local provision should help.

There is longstanding issue of the limitations of using Community Infrastructure Levy (CIL) to fund the establishment of new special schools. Is there a basis for looking at some form of pooled CIL provision for this purpose across the county?

4) Enhanced Pathways within mainstream schools
Feedback from parents, and the increasing number of children being taken out of formal schooling in favour of elective home education provide evidence that transitions from primary to secondary are not working well for many SEND children. Trials are ongoing in a number of schools in Oxfordshire – including two within Oxford – to see if these transitions can be helped by providing more targeted support to SEND children in Year 6 and Year 7.

Rose Hill Primary School is providing smaller Year 6 groups and focused teaching, and the Oxford Academy is trialling the single class teacher model for some SEND children in Year 7. However, the report has not provided evidence on the impact of these approaches, the optimum size of these focused learning groups, or what additional funding would be provided to enable other schools to adopt them.

Further, the proposal implies that – by Year 9 – the SEND children will be ready for full reintegration with their year group peers. Again, is there evidence to support this or is this a leap of faith?

The approach also implies that the single teacher provision within Year 7 and 8 secondary will be a catch all across all of the SEND requirements: social, emotional,

communication, sensory and academic needs - but often different approaches will be required for different SEND needs.

What will be in the curriculum for SEND children in Years 7, 8 and 9? Will they be receiving teaching in functional skills alongside academic curriculum? And if so, will special school expertise be offered to mainstream schools on how to develop these additional curriculum elements?

5) Reconfiguring Requests for Additional Funding for schools
Devolution of responsibility for allocation of the funding pot for additional support to groups of local school leaders sounds superficially attractive, however, Oxford City Council notes this is proposal is opposed by the OSSP.

School leaders expressed concerns over the clear lack of capacity to pick up this responsibility in addition to other duties. But there were also concerns around financial accountability, the administrative burdens and inefficiencies of this model, and the obvious risk of setting schools against each other – as they were clear they don't know enough about the nature of inclusive practices in each other's schools.

Without clear evidence of support among schools and details on how this measure is to be implemented, Oxford City Council cannot support this proposal.

6) Coordinated approach to supporting children with SEND at the earliest opportunity
The proposals to increase the provision of information to parents on early support and intervention, and investment in training for staff is welcome. However it is likely this will need to be targeted as investment needs for these proposals are significant. Special Educational Needs Coordinators (SENCOs) in schools will be vital to the success of this and they are already over-burdened, so there would benefit from more outreach provision from special schools. However special schools aren't currently funded share capacity and expertise into mainstream schools.

It is noted that a new digital platform is at the centre of this proposal and it is questionable if that is the best place for limited resources to be invested.

General comments
Training is at the heart of a number of the new proposals and it is clear there is a need for a professional development continuum for teachers in Oxfordshire, from PGCE on upwards. The initiative by a number of Oxford colleges to seek twinning arrangements with primary schools is particularly welcome. Oxford City Council is keen to see further closer working between Oxford's two universities and the Teaching Hubs and more support for student teacher placements.

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