



Building Communities of Specialist Provision: A Collaborative Strategy for Children and Young People with Special Educational Needs and Disabilities (SEND) in Lincolnshire



Public consultation feedback with responses to issues and questions raised during the Consultation Phase via consultation events and emails submitted to the SEND mailbox.



8th January – 14th March 2018

Please Note: Questions, concerns and comments raised throughout the consultation have been 'themed'. Please be assured that all feedback has been considered in full and is being presented to decision makers.

The final consultation findings will be included in a published report to be presented to all Special School Head Teachers, LCC's Executive Councillor and Children and Young People's Scrutiny Committee in order to inform decision making on the strategy.



No	Theme	Summary of Issues Raised	Response/Comment
1.	Consultation and decision making process	<p>Not a genuine consultation – decisions already made.</p> <p>Concern about the use of Likert scaling and perception that statements were biased.</p> <p>People have valued the number of consultation opportunities and different ways in which contributions could be made.</p> <p>Parents have not had a voice until the consultation period.</p>	<p>This was a genuine consultation and all feedback has been considered and is being included in reports to decision makers.</p> <p>The statements which the public were asked to scale using the Likert scaling method were not intended to have any bias; they were straightforward statements that linked directly to the proposals on which the consultation was based. The scaling allowed for respondents to vary their responses from a strongly disagreed position through to a strongly agreed one. The survey also provided free text boxes for respondents to provide comments. This has provided a rich source of information. The survey questions were developed in partnership with the Lincolnshire Parent Carer Forum to try to ensure that they were accessible to all.</p> <p>It is positive to hear that members of the public valued the range of ways in which they could contribute to the consultation.</p> <p>The Lincolnshire Parent Carer Forum has worked with the Special School Leaders and the County Council from the inception of the project; they represent parent carers across the county and were crucial to the development of the proposals which went out for public consultation. The consultation period was the opportunity to hear the views of parents, young people and other interested parties.</p>
2.	Proposed capital investment for Special Schools - funding allocation & feasibility of project	The council needs to save £22 million – how can it afford the investment in this project?	The £40 million finance for this project is capital funding and is not part of the overall council's efficiencies. In addition, the funding for schools is provided through a separate Dedicated Schools Grant and is again not part of the council's £22 million efficiencies.

What is the £40 million to be spent on and is it enough? The council has acknowledged a shortfall of £5 million.

There is no detail about what each Special School will receive in terms of investment.

The capital investment identified will be used to increase the capacity and suitability of the premises to meet the needs of all pupils. Many of the Special Schools are neither big enough nor do they have appropriate space and facilities to meet the growing complexity of their pupils. The £40m will be utilised to expand some schools to accommodate the growing demand for Special School places whilst others will see significant improvement to their current premises. For example, where a Special School does not have the facilities to meet the needs of pupils with physical disabilities, this will be included in their building program, including track hoists, improved hygiene suites, medical facilities and ensuring access to a suitable hydrotherapy pool. Special School Leaders have also identified the importance of access to quiet/low arousal spaces and more sensory spaces which will be accommodated. These are just some of the areas that will be improved to ensure that all schools will be able to meet the individual needs of pupils in their local communities.

Based on the initial analysis completed, LCC firmly believes that the allocated budget will support the development plans discussed with each Special School and the implementation of the Special Schools satellite pilot. However, as many of the Special Schools are academies they also have the opportunity to bid for Condition Improvement Funding.

Each school has been assessed by the council's Corporate Property Team. The assessment has taken into account the increased property requirements for each school in line with DfE published Building Bulletin 104 guidance and has given an early view on the potential investment needed overall. Detailed design work will commence to further inform the actual building requirements should the strategy be approved ensuring any building adaptations or additions

		Should there be a Special School in Sleaford?	effectively enhance and support the learning environment. Sleaford was considered as a potential area for a new Special School and pupil numbers mapped for a school in this area. However, School Leaders felt that, at this time, the potential number on roll would not support a proposal for a new school. The decision for a new Special School in Sleaford is being kept under review.
3.	Proposed capital investment for Special Schools – development plans for schools	<p>Welcome the increased capacity that the capital investment will bring.</p> <p>No detail of intended capital programme including plans for deaf children.</p> <p>Concern that Special Schools are under-funded and therefore can't meet the needs of their pupils.</p>	<p>The capital investment for this project is significant and provides a unique opportunity to ensure that specialist provision in the county is fit for purpose to meet the needs of 21st century pupils.</p> <p>Please see response above regarding capital programme.</p> <p>The majority of children and young people with hearing impairment receive their education in Lincolnshire's mainstream or Special Schools and will continue to do so. However, there are a small number of young people who require specialist provision that Lincolnshire Special Schools are unable to replicate e.g. an environment in which communication is through British Sign Language. It is therefore recognised that some deaf children may still require specialist provision outside of the local area.</p> <p>Special School pupils are assessed to an agreed band and descriptor, which determines the level of funding for that pupil, including costs such as Teacher, Teaching Assistance and Midday Supervisor support. The funding formula is kept under review to ensure it meets the needs of the changing demographic of Lincolnshire Special Schools' pupils.</p> <p>The funding formula has been built up on a theoretical cost model via a zero-based budgetary approach using key cost drivers. Engagement takes place with Special Schools to</p>

		<p>Why is a new school being built in Lincoln when Queen's Park was closed?</p> <p>Special Schools that stand to gain will support the proposals.</p>	<p>ensure the formula continues to be fit for purpose. The Local Authority is assured that the funding levels meet the needs of its Special School pupils.</p> <p>The proposed new school in Lincoln will relieve the current pressures on St Christopher's School which is full to capacity. The closure of Queen's Park was at a time when the Local Authority's intention was to improve opportunities and facilities for children and young people with more complex needs and disabilities; this could not be facilitated in the Queen's Park premises which were not fit for purpose and could not be developed.</p> <p>Almost all of the Special Schools in Lincolnshire will benefit from the capital investment that this project brings but, more importantly, School Leaders believe that this approach will benefit young people with additional needs.</p>
4.	Meeting all needs in one setting	<p>Don't believe it will happen.</p> <p>Most Special Schools in the county are already meeting a wide range of needs and this is working.</p> <p>Concern that all needs could not be met in one setting.</p> <p>Concern that 'all needs' will dilute the standards in specialist schools.</p> <p>'All needs' suggests a 'one size fits all' approach.</p>	<p>If the proposals are accepted there is no reason why this project will not go ahead. School Leaders and the Local Authority are committed to maintaining momentum with the project.</p> <p>As the evidence demonstrates, Lincolnshire Special Schools are already meeting the needs of a far wider range of educational need and/or disability. School Leaders are confident that the proposed model is one that they can deliver.</p> <p>There is no intention to dilute the standards in Special Schools. Over recent years the schools have developed expertise to ensure that they have been able to meet the widening range of needs that they cater for. There is also an absolute commitment from the School Leaders to share expertise and best practice across all the schools so that the workforce is equipped to respond to children's needs. There is certainly no suggestion that one size fits all and</p>

		Children with differing needs require different interventions.	Special Schools will continue to respond to the unique needs of each pupil. As is currently the case, pupils will have, through their Education, Health and Care Plan, their unique needs clearly identified along with the interventions they require to support them.
5.	Meeting the specific needs of pupils with complex physical/medical needs in an all needs setting	<p>Concern that the specific needs of children with physical and medically complex disabilities are significantly different and require a completely different environment and learning support.</p> <p>Health and safety risks for less mobile young people who may not be able to move out of the way of others with challenging behaviour.</p> <p>Vulnerable pupils need to feel safe.</p>	<p>Please see response above.</p> <p>The unique needs of all pupils will continue to be paramount and the re-modelled schools will have the appropriate environments to ensure that children with physical and medically complex needs have their needs met. The levels of support they require to facilitate their learning will not change.</p> <p>There is no intention to simply put all pupils, irrespective of their needs, in the same classes. As is currently the case in schools catering for a wide range of needs, the placement of pupils in specific teaching groups is carefully considered. Their vulnerability and safety will continue to be a priority.</p>
6.	Meeting specific needs of pupils with Autism in an 'all needs' setting	<p>Need for low arousal, low stimulus environment.</p> <p>Need for specialist resources.</p> <p>Should be considering more specialist autism schools.</p> <p>Gosberton House should take pupils up to the age of 14 as there is a gap in provision.</p>	<p>The re-modelled schools will be designed to ensure that they have the appropriate spaces and resources to meet their needs. The School Leaders have been clear about what they require and the assessments undertaken by the council's Corporate Property team have taken all of this into account in the high level plans that have been developed.</p> <p>There is not the evidence to support the need for more specialist autism schools.</p> <p>School Leaders at Gosberton House have not requested, throughout the development of the proposed strategy, a change to the age range of the pupils they take. There is no gap in provision for this age group and most pupils leaving Gosberton House at eleven settle well into other</p>

			Lincolnshire Special or mainstream schools.
7.	Transport Policy	Concern that children remaining in their existing school may no longer be entitled to transport.	No child will be expected to move from their current Special School unless this is what they and their family would like them to do. If the young person has a transport entitlement than this will continue.
8.	Proposed Satellite hubs and the commitment of mainstream schools	<p>Mainstream sector may not be interested in having specialist satellite hubs.</p> <p>The Hubs sound exciting.</p> <p>Concerns that mainstream don't understand the needs of children and young people with additional needs.</p> <p>Children and young people with additional needs can do so well in mainstream schools.</p> <p>Some parents do not want their children to go to a specialist school and welcome the support in the mainstream setting.</p> <p>Parents keen to consider this for their young people who they feel are ready to try/return to mainstream education.</p> <p>Seen as the 'right direction' but concerns that this isn't always right for pupils with ASD.</p>	<p>The Local Authority has already received a significant number of expressions of interest from mainstream schools that would be keen to have satellite hubs on their site. They too are excited about the potential to support children and young people with additional needs in this way.</p> <p>There are approximately 15,000 children and young people with Special Educational Needs Support or an Education, Health and Care Plan having their needs met in Lincolnshire's mainstream schools.</p> <p>This proposal acknowledges that there is still room to increase the expertise in the mainstream sector and the strategy offers some real opportunities to achieve this.</p> <p>It is the case that some parents do not want their children to go to a Special School and, if the child's needs can be supported in mainstream, they should be afforded the opportunity to remain in mainstream.</p> <p>The proposed Hubs provide an opportunity for young people to experience mainstream school with the support of specialist staff.</p> <p>There is divided opinion about where and how children with ASD should be educated. All views expressed through the consultation are being considered by the academies and schools and are being shared with decision-makers.</p>
9.	Workforce development	Not possible to upskill staff to the same level.	The Special School Leaders are confident that they will

		<p>Too costly.</p> <p>Disbelief that all staff can be trained to teach children with complex Autism Spectrum Disorder (ASD).</p> <p>Where is the detail of the workforce development plan?</p> <p>Gosberton House should be a training centre for staff working with pupils with moderate to severe ASD.</p>	<p>have an appropriate level of expertise in each of their schools. They are already meeting a growing range of needs and are experienced in developing the workforce to respond to the changing needs of the young people that they work with. Lincolnshire has a wealth of expertise across the sector and there is a commitment to ensure that best practice is shared.</p> <p>The Local Authority, with support from the Schools Forum in October 2017, has provisionally earmarked £2m in revenue funding from the Dedicated Schools Grant (DSG) underspend to support costs for training, start-up and transitional support.</p> <p>All Special Schools in the scope of the proposals already meet the needs of children with complex ASD.</p> <p>Following the outcome of the consultation the detail of the workforce development plan will be devised. The project will require up to 5 years to implement and workforce planning will be incorporated into the overall timeline for the development.</p> <p>Gosberton House leaders have given a commitment, along with other Special Schools that also have expertise in ASD, to support the school workforce.</p>
10.	Health offer and provision of therapy services	<p>Concerns expressed about a lack of Speech and Language Therapy provision in the county.</p> <p>Concern expressed that Paediatricians have patient lists that are unmanageable.</p> <p>Concern at lack of Sensory Integration Therapy in the county.</p>	<p>There is a dedicated work stream considering the health offer for children and young people with Special Educational Needs and Disabilities. There is a commitment from the Clinical Commissioning Groups and health providers in Lincolnshire to develop an integrated system that appropriately supports pupils with additional needs.</p> <p>There is a separate multi-agency strategic review of the Autism Pathway and this includes consideration of Sensory</p>

			Integration Therapy.
11.	Out of County provision	<p>Concern that young people settled in out of county specialist provision will have to give up their place.</p> <p>Concern that parents will no longer have the choice of out of county specialist provision.</p> <p>Parents reporting distress at the loss they feel when their child has to be placed in out of county provision because no local school could meet their child's needs.</p> <p>Children and young people should not have to live away from home to receive an appropriate education.</p>	<p>No young person in out of county provision will have to give up their place.</p> <p>Children and young people are placed in out of county provision because local Special Schools are unable to meet their needs.</p> <p>Through the proposed strategy more of their needs could be met in local Special Schools and therefore there should be no requirement for children to go into out of county provision. However, if a child had such specific needs that only out of area provision could meet them then the process for placement will continue as it is currently.</p> <p>The Local Authority, Parent Carer Forum and Special School Leaders recognised that many parents do not want their young people to have to live away from home in order to access appropriate education. This was a key consideration in the design proposals.</p>
12.	Future of Post 16 and 19 provision	Concerns that the proposed strategy may exclude other Post 16 and Post 19 providers.	There is no intention to deliver all specialist Post 16 and Post 19 provision in Special Schools. The situation will remain as it currently is; through the Education, Health and Care Plan review process the most appropriate Post 16 provision will be agreed for young people according to their needs, their aspirations and their interests. The focus will remain on preparing young people for adulthood and identifying the most appropriate Post 16 setting to support them.
13.	Future of residential provision	Questions were raised about the future of residential facilities at both St Bernard's School and St Francis School.	How the current residential provision will be used in the future will be influence by the decisions that come out of the wider work that is being undertaken by Special Schools, the Local Authority. Parent Carer Forum and

			health services. This will be reported separately.
14.	Parental preference	<p>Move to 'all needs' is to remove parental preference and entitlement to transport.</p> <p>Will parents still be able to state a preference for a particular school?</p>	<p>There is no intention to remove parental preference; this is explicit in the SEND Code of Practice 2015. However, it is anticipated that, if all Special Schools are able to meet 'all needs', preference because a school has a specific designation, will no longer be an issue for parents.</p> <p>The transport policy is not changing. As is currently the case, if a child has a transport need in line with the policy, it will be met by the Council. If a parent has a preference for a place at a school that is further distant from the one named by the Council as able to meet his/her needs, the council may not always have to meet the additional costs of this transport provision, but where transport entitlement is not automatic, every case is looked at on its merits, and this good practice will continue.</p>
15.	Managing change and transition for pupils	<p>Concern that some young people won't cope well with building work in their school.</p> <p>Some children will be excited about having builders on site.</p> <p>Children may be excluded or have reduced educational support if they don't cope well with the changes.</p> <p>Will children be made to transition to their nearest school?</p>	<p>Any building work on a school site will have mixed responses. School Leaders will work with parents to ensure that children that don't cope well with the developments are prepared as well as possible and supported throughout. The work will be planned to minimise disruption but there will inevitably be some disturbance.</p> <p>No child will be excluded or have their education support reduced because they don't cope well with the changes. Schools are very used to working with their pupils and will also work closely with families to ensure that difficulties are anticipated and planned for. The changes will take place slowly over time and there will be opportunities for families to share any concerns they have for their child.</p> <p>No child will be made to move to their nearest Special School unless they and their family request this. If that is what they would like to do, the authority will work with the</p>

		<p>Some parents would like their child to transition to their nearest school as soon as it is available to take them.</p> <p>Parents expressed trust in their child's existing school to support their child should they decide to move to their nearest school.</p>	<p>family and school to plan an appropriate point at which to make the transition.</p> <p>It was positive to hear many parents describe the trust they have in their child's current school to support transition should they decide they want their child to move at an appropriate time.</p>
16.	Timeline and implementation plans	Members of the public keen to know what the timeline will be for the implementation of the plans and when the detail will be shared.	The next phase of the project, over the summer, will determine whether the proposals are accepted. If there is agreement then a more detailed implementation plan will be published post September 2018. If the proposals are agreed then the detailed plans relating to individual school development will be devised and schools will be able to share the detail with pupils, families and interested parties.
17.	Social, Emotional and Mental Health (SEMH) provision	Why are the SEMH schools not included in the proposals?	<p>There are challenges regarding current capacity and whether it is sufficient or if there is a need for more primary school places and whether the existing model can meet the increasingly complex needs of pupils with SEMH.</p> <p>A work stream, with the objective of developing a shared ethos and way of working across the county for SEMH provision, consistent with the vision and principals of this strategy, has been established and will report once the work is completed.</p>
18.	Extended day/groups and clubs	Parents were interested to know whether the project had considered the need for extended day and/or clubs for young people.	This is a consideration of the project. Whilst it is anticipated that children attending schools nearer to their home will have a greater opportunity to join their local clubs, it is also recognised that that there may be a need to provide other opportunities for young people to access social inclusion. The Parent Carer Forum highlighted this as an area of concern for families. This is being considered in conjunction with the wider integrated health and social care offer to be developed from the work currently being undertaken.

19.	Improvements to SEND provision in mainstream schools	Mainstream Schools fail autistic children.	Please see response to Theme No. 8.
20.	Proposals as a money saving exercise	The council cannot afford the transport costs for young people with additional needs and this proposal is really a transport review.	<p>The review is not a transport review, and no changes are planned to the Council's transport policy for children attending Special Schools as a result of the proposals. No savings on transport costs are factored into the planning of the proposals.</p> <p>It is confirmed that no child currently in Special Schools in Lincolnshire will be required to move school. However, once the strategy has been implemented and established it is envisaged that more pupils will attend their local Special School since it will be able to meet their needs and therefore there is likely to be some savings in the transport budget. This may be up to £2-3 million per annum, but is unlikely to be realised for some time. No diminution of the quality of the service to pupils will take place.</p>
21.	Independence of the Lincolnshire Parent Carer Forum (LPCF)	The LPCF cannot be independent as it received £10,000 from the Local Authority.	<p>Parent Carer Forums are specifically tasked, under the Special Educational Needs and Disability Code of Practice (2015) with working alongside Local Authorities to ensure that the services they plan, commission, deliver and monitor meet the needs of children.</p> <p>Parent Carer Forums receive a relatively small grant from the DfE. In order for them to perform the duties set out in the statutory guidance and for the authority to fulfil its responsibility in working with the PCF. Around 55% of PCFs receive additional funding from their Local Authorities with an increasing number receiving over £25k per year as co-production has become routine in developing, and influencing both strategic and operational practice.</p> <p>In the last financial year Lincolnshire County Council grant</p>

		<p>The LPCF were fully signed up to the strategy before the consultation began.</p>	<p>funded the forum £10,000 to cover the expenses they would incur in being involved in the substantial work the project has required including attending meetings, work streams, holding events and seeking parental views on this consultation. LPCF funding is transparent and their accounts are published on their website.</p> <p>The PCF was supportive of the proposed strategy going to public consultation. They were able to support the proposals being consulted on because the authority and School Leaders have taken into account their feedback, constructive challenge and the contribution that they've been able to make based on the extensive feedback they receive from parents in the county. Their support to go to consultation was just that; they, like the authority and the Special School Leaders want to hear the views of the public and this will influence the strategy going forward.</p>
22.	Travel time for children and young people	<p>Welcome the proposals because the journey to and from school is a significant issue for some young people.</p> <p>Children's education is worth the sacrifice of longer journeys.</p> <p>Children should not be travelling miles away from home to receive an education.</p>	<p>There are divided opinions on the journeys that many children currently make to get to their Special School. All feedback has been taken into consideration and is being shared with decision makers.</p>
23.	Children and young people will have to move schools	<p>Concern that children will have to move schools.</p> <p>Concern that families will be disadvantaged if they choose to keep their child at their existing school.</p>	<p>No child will have to move from their current Special School unless they are due to leave or they and their family choose to move them to their nearest school when it is ready.</p> <p>No family will be disadvantaged by choosing to keep their child in their current Special School. It is anticipated that most children will remain in their current provision. If they wish to move then they will be supported to make the</p>

			transition at the appropriate time.
24.	Meeting the needs of deaf children	No proposals in the strategy for how the needs of deaf children will be met and/or how the Teachers of the Deaf will be deployed.	See response to Theme No. 3. There is no proposed change to the way in which the authority deploys the Teachers of the Deaf. The service will continue to support children with hearing impairment in their setting.
25.	Data and Information on children's primary and secondary needs.	The Local Authority has underestimated the number of children with ASD. Data is flawed.	The data collated on primary and secondary needs comes from the School Census which is a Department for Education survey completed by schools. The School Census is not a record of the number of children and young people with a diagnosis of autism. The statutory guidance is specific that a child with a medical diagnosis or disability does not have special educational needs unless special educational provision is needed to access the curriculum. There will therefore be some young people with a diagnosis of autism that will not be captured on the School Census. The Census requests schools to record the pupils' greatest or primary need and, where appropriate, their secondary need. Children and young people with autism may have a range of special educational needs and therefore their autism may not be the greatest presenting need at the point of the census. It will therefore never accurately capture all children with autism. This does not mean that the data is flawed.
26.	Gosberton House Academy	The school will be closed. The school has been coerced into agreeing the proposals.	There is no suggestion that Gosberton House will close. There has been no coercion. The Leaders of Gosberton House Academy has worked with LCC and all of the other Special School Heads. The Lincolnshire Education Trust endorsed the proposal going to public consultation.

		<p>Concern that the school will lose its National Autistic Society accreditation.</p> <p>The strategy may be fine for other schools but Gosberton House should be left as it is.</p>	<p>It will be for Gosberton House Academy to retain its National Autistic Society accreditation. Other schools are also currently working towards this accreditation and involved in the delivery of the outreach service.</p> <p>Ultimately it will be for the Trust to decide whether it makes a business case to the Regional School Commissioner to initiate the proposed changes.</p>
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