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## **NNPCF response to Changes to the School Organisation (Prescribed Alterations to Maintained Schools) (England) Regulations 2013**

Thank you for the opportunity to submit a response to the proposed changes to allow temporary changes outside statutory guidance to local-authority-maintained schools' SEND provision.

The National Network of Parent Carer Forums is made up of 150 parent carer forums based in local authorities across England. Our member forums have a membership of 93,000 parent carers covering the full range of special educational needs and / or disabilities (SEND). This gives us a unique insight into the lives of families with a child or young person with SEND.

At the NNPCF conference on the 7th November, we held a workshop to provide an opportunity for our delegates to input into the ongoing cross governmental review into the SEND system being led by the Department for Education. The workshop highlighted the unique contribution of parent carer forums in being able to propose solutions that will really work for families and service providers alike.

The NNPCF outlined some key messages which should be considered in light of the proposed changes to School Organization regulations.

1. Listen to families and intervene early
2. Make sure there is enough money and spend it well
3. Align incentives for school and system leaders
4. Increased accountability
5. Right people, right knowledge, right skills
6. Lifelong outcomes
7. Coproduction

The NNPCF recognize the financial pressures facing Local Authorities and the national increase in demand for specialist school places. The recent uplift to high needs funding in education is very welcome. This must be maintained and increased as necessary along with developing a better understanding of local needs and working in a joined-up way to strategically place plan more effectively.

Forums are reporting that despite the current regulations that state that the only changes permitted outside of the statutory route is for schools to expand or make changes to their age range; schools are making other temporary changes to provision due to pressures on placements. Forums are reporting that children and young people are being placed in inappropriate placements and in some cases are remaining in Alternative Provision for up to a year because no alternative placement can be found.

The NNPCF acknowledges that the current proposed temporary changes would allow a much greater scope of changes to be made but are concerned that the definition of temporary could be up to 3 years.

The NNPCF welcome the proposed changes to a school SEND provision if it ensures that local areas have the right provision to meet the needs of children and young people with SEND and deliver better **lifelong outcomes**.

All of the proposed changes should involve discussions with the Parent Carer forum (**coproduction**) and be published on the Local Offer website:

- Allowing an increase in number of pupils in a special school
- Allowing a decrease in number of pupils in a special school
- Change the type of SEND provision in a special school
- Change the establishment for a SEND provision in a mainstream school
- Change type of provision for SEND in a mainstream school
- Discontinuance of the provision for SEND in a mainstream school

The NNPCF would draw your attention to the requirement set out in the Children and Families Act 2014 *'to make provision more responsive to local needs and aspirations by directly involving disabled children and those with SEN and their parents, and disabled young people and those with SEN, and service providers in its development and review.'* (COP 4.2)

*'Local authorities should do this in a way which ensures that children, young people and parents feel they have participated fully in the process and have a sense of co-ownership.'*(COP 4.9)

The proposed changes should be part of a regular review of the Local Offer and ensure that children, young people and parents contribute to the decision-making at a strategic level, along with schools, local authorities and wider partners e.g. Health.

The NNPCF would like the guidance to be updated so that schools should ensure they have consulted with the LA and families before considering any temporary changes. **The NNPCF**



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does not agree with the proposal that would allow changes without a consultation and remove the need for them to be made public by removing the requirement for notification to be published.

The NNPCF would ask DfE to consider:

- How would these proposals sit alongside the LA duty (CFA) to keep under review the provision made by them?
- How would these proposals sit alongside local strategies – strategies that LAs have had to submit in connection with bids for capital funding?



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