

## **SEND and Inclusion Strategy consultation report**

### **Introduction**

This report describes the engagement and consultation undertaken and responses received on the draft Special Educational Needs, Disabilities and Inclusion Strategy 2024-2029.

The draft strategy was developed on behalf of the Tower Hamlets SEND Improvement Board: a partnership between the London Borough of Tower Hamlets, schools representatives, Barts Health NHS Trust, North East London Integrated Care Board, East London NHS Foundation Trust, the SEND Parents forum, and the Our Time Young People's Forum.

The draft strategy was co-produced and informed by a range of consultation and feedback from children and young people, parents, front line staff and partners.

As a result of the feedback received during the consultation on the draft strategy, changes were made to the strategy, including :

- A section has been added on how the strategy will be delivered and the role of the SEND partnership, including clearer linkages with the early help partnership
- Shared outcomes for children and young people with SEND have been added to the strategy
- Specific commitments were added to the strategy relating to alternative provision and to children and young people with SEND who are known to children's social care, youth justice and probation
- More performance measures added: we have used measures where there is existing, reliable data – typically data in the public domain. Where possible we have added additional measures. This will be complemented by the development of an annual survey of children and young people, and by operational monitoring of strategy delivery
- Young people and parents' feedback, including on culturally sensitive SEND pathways and access the services for different communities, will be embedded in delivery planning of the strategy.

### **Early engagement in the strategy development**

The six priorities within the draft strategy were shaped by a range of engagement activities and insight including :

- Discussion with partners at the SEND Improvement Board in November 2023 and February 2024
- an in-person discussion with the Our Time all ability youth forum to find out about the issues that matter most to young people with SEND (November 2023)
- online surveys with partner representatives and Special Educational Needs Coordinators in schools (November to December 2023)
- an online workshop with professionals to map initial challenges and issues (November 2023)
- an in-person workshop attended by 50 people to which partners, parents and young people were invited as well as education, health and voluntary sector professionals, with a focus on developing practical strategy actions (January 2024)

- analysis of recent consultation and engagement conducted as part of the Delivering Better Value in SEND programme – including survey responses from more than 100 parents and carers (2023 – 24)
- Feedback from families attending Let’s Talk SEND events.

## Consultation

The draft strategy was published for public consultation on 1 May. The consultation period ran for six weeks, from 1 May to 12 June.

Our consultation approach used a digital survey and a series of engagement events to get a combination of qualitative and quantitative feedback and reach a wider audience. We also received a separate written response from Primary Schools Heads.

Furthermore, the Tower Hamlets’ Children and Education Scrutiny Sub-Committee discussed the draft strategy at their meeting on 9 May. Elected members raised questions about the overrepresentation of boys, Asian, Bangladeshi and Black students, and the underrepresentation of girls on EHCPs. Members also questioned how harder-to-reach communities would be reached by the consultation.

## Survey

We launched an online survey on Tower Hamlets Council’s engagement site Let’s Talk Tower Hamlets on 1 May. The survey includes a combination of Likert scale and open-text questions to get quantitative and qualitative feedback. There was no word limit to the open text responses, allowing respondents to provide lengthy feedback. The questions were designed to be accessible and suitable for both professionals and members of the community. An easy read and Widgit version of the strategy were made available online .

We promoted the survey very widely via a range of channels and forums to reach a wide audience, including to children and young people, parents, voluntary/community/faith groups, education professionals and healthcare professionals. The latter part of the survey fell within the pre-election period, meaning it was difficult to promote the survey to residents. Table 1 shows the list of channels that we promoted the survey through.

**Table 1**

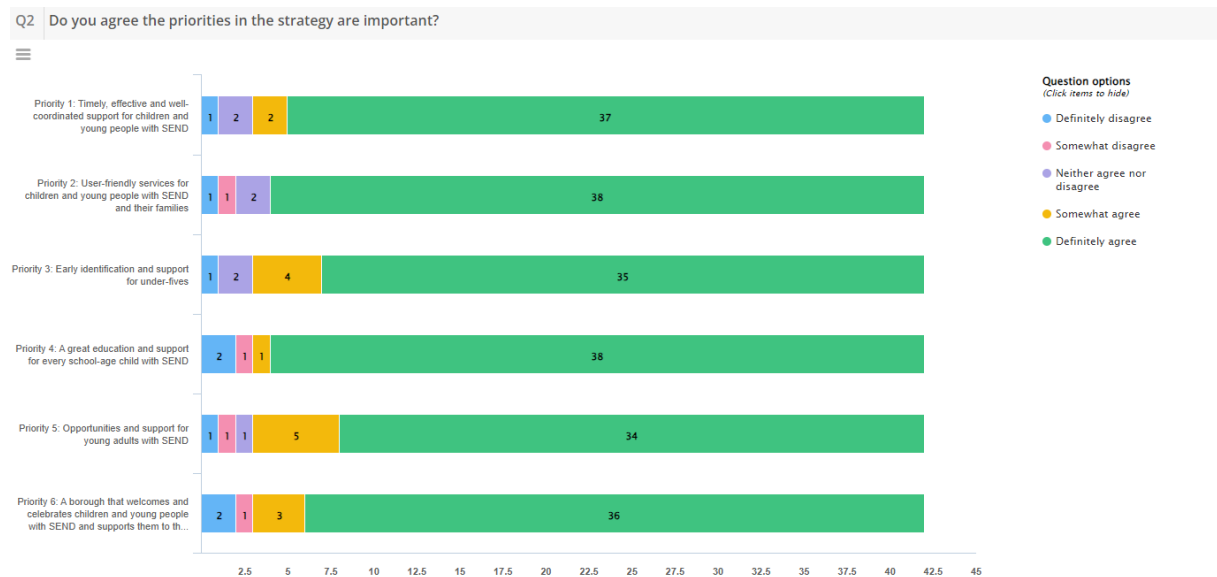
<b>Channels</b>	
Council social media	Children and young people’s community voluntary sector
Parent and Family Service newsletter	Community voluntary sector
Head Teachers’ Bulletin	Interfaith forum
Let’s Talk SEND supplement	Our Time Youth Forum mailing list and social media
Parents’ Forum website and Whatsapp group	Let’s Work young people’s event
On screens in children’s centres	Members’ bulletin
Tower Hamlets SEND Information, Advice and Support Service website and mailing list	Community equality networks
SEND Improvement Board mailing list	Whatsapp Somali Autism support group
SENCO mailing list	Children and young people’s community voluntary sector

We received 42 survey responses. 18 education professionals, 15 parents, 6 healthcare professionals, 2 voluntary/community/faith organisation, and 1 social care professional responded to the survey.

Respondents were invited to submit equalities monitoring data. In response to the question 'How would you best describe your ethnic group?' 13 selected White British, 3 Other White, 1 Mixed White and Asian, 2 Asian/Asian British Bangladeshi, and 1 selected 'Any other background'. In response to the question 'What best describes your gender' 17 selected 'Woman' and 3 selected 'Man'.

## Survey responses

The vast majority of respondents definitely agreed with each of the six priorities in the draft strategy:



The survey also asked 3 open-text questions. To analyse the responses, we coded the answers under each question. Key themes under each question have been pulled out below.

Question 3: 'Please explain why you agree or disagree with the priorities'

Response themes:

- Respondents largely agreed with the priorities and the vision that the draft strategy was putting forward.
- Over a quarter of responses explicitly referenced early intervention as an important priority. For example, *'I agree with all the statements above especially early support for under 5's as the current system has a massive gap in which a child and their families has access to support'* (parent).
- Professionals highlighted instances of unclear language and jargon used in the draft strategy (see Table 3 for a list of language challenged throughout the consultation process).
- One comment noted that, *'Priority 5 as expressed includes nothing about amount or quality of opportunities and support, so in effect is already achieved – some opportunities and support exist now'* (healthcare professional)
- Parents highlighted the importance of developing inclusive environments for their children and agreed with the importance of 'user friendly services'. For example, *'It is important that we adapt and work around people with send rather than expecting them to fit in and adapt to what's called normal.'* (parent)
- One response commented that the strategy does not cater for multi-ethnic communities and another commented that the process of applying for EHCPs could be easier for families where English is not their first language. A full EqIA has been developed for the SEND Strategy. It will identify any impacts on the protected characteristics and mitigate any potential negative impacts.

- One comment from an educational professional asked why recent discussions about “Ordinarily Available Provision” were not reflected: this is because ordinarily available provision is an element of the Inclusion Framework, which is part of the strategy.

Question 4: ‘What impact do you think the strategy will have on you, your child, or children and young people you work with?’

Response themes:

- Some concerns were raised about the ambitious scope of the strategy and how it would be delivered. Issues raised include how the strategy will be funded, the capacity of schools, the availability of services, and the ability/capacity of the children’s workforce to deliver the strategy. For example, *‘I think the strategy’s aims are good but it is dependent on receiving sufficient funding for children with SEN in schools and provisions’* (educational professional).
- A range of professionals and parents thought that the strategy would have a positive impact on children and young people if the measures were better defined (see Appendix A for a list of comments raised on the measures throughout the consultation).
- Several parents felt that the strategy will have a positive impact on their children if more information is available about what support is available and how to get help. For example, one parent commented that the strategy *‘will open up more resources and guidance to what’s available’*.
- Some educational professionals commented that whilst early intervention is important, there are challenges around recruitment of Speech and Language Therapists and the capacity of the SEND workforce to implement the vision set out in the strategy.

Question 5: ‘Do you have any other comments on the strategy?’

Response themes:

- Parents agreed with the priority on providing opportunities for young adults with SEND, sharing concerns about the lack of support available for their children when they leave school.
- Professionals highlighted the importance of creating inclusive environments, particularly in early years settings. One respondent suggested that children are being categorised as SEND when what they need is day-to-day support.
- Several respondents highlighted the importance of working in partnership to deliver the strategy, for example *‘It is a good strategy and needs more support from mainstream partners and teams to be truly impactful.’* (social care professional)
- Respondents questioned the timescales for delivery and who will lead the work.
- One response highlighted the importance of, and the challenges of, truly listening to the experiences of children and young people: *‘Getting feedback from children and young people is admirable, but there is no detail about how this will be achieved in a way that ensures everyone has an equitable opportunity to be heard – including those with communication needs.’* (healthcare professional).
- One response from a healthcare professional asked if the strategy could include a reference to the increase in ADHD referrals and awareness.

## Engagement events

We attended 13 events, both in-person and online, attended by over 190 people including educational professionals, health professionals, young people, parents, and community organisations. We organised events with parents, including events with Somali and Bangladeshi parents, and used translators where necessary.

Written responses from the primary school heads consultative and others are also reflected below.

Senior staff from Tower Hamlets' Education Directorate attended all the meetings and answered questions about the strategy and plans for delivery.

**Table 2**

<b>Engagement events</b>
School Organisation Strategy Group 30 April
SENCO conference 9 May
Children and Education Scrutiny Sub-Committee 9 May
Every Chance for Every Child Forum 14 May
Special Heads Consultative 15 May
School Workforce Trade Union Forum 16 May
Our Time Forum 18 May
Primary Heads consultation 20 May with a written submission
Somali families community consultation 30 May
Health stakeholders consultation 12 June
Early Help Partnership Board 13 June
Women's Inclusive Team community consultation 13 June
Bangladeshi parent consultation 26 June
Shifa Health and Social Care discussion 1 July
Discussion with Partnership Care 3 July

## Issues raised throughout engagement events:

Throughout the engagement events, some concerns were raised about how the strategy would be delivered. Some participants suggested prioritising one or two areas so all partners can work toward the same goals, and others suggested laying out a clear delivery plan with timescales so partners know what they are being expected to deliver. Some suggested that the strategy needed to be clearer on governance and accountability and how impact will be measured.

A second theme raised in discussions was the level of detail included in the draft measures. It was suggested that the strategy needed to include an outcome framework for children and young people with SEND, to support effective measurement. Educational professionals highlighted that there were not many measures for SENCOs and schools to work towards and that it was not clear what schools would be asked to deliver. Attendees also asked how the measures will be monitored over the five years. Appendix A provides a summary of specific comments received on the measures.

Educational professionals raised concerns about the capacity of schools to deliver the strategy, noting that *'welcoming and celebrating children and young people is challenging when EHCPs are inappropriate and/or out of date'* and referenced the challenges schools are facing in accessing services and the capacity of services. Educational professionals also noted that having locally based caseworkers available means that they have a better understanding of the needs of young people and the settings.

Specific gaps were identified by a wide range of professionals. Gaps identified include alternative provision, Ordinarily Available Provision, the workforce, children's social care, youth justice, and health. Furthermore, young people highlighted that they wanted to see emotional wellbeing and medication included in the strategy.

Professionals across the Tower Hamlets Partnership supported the importance of 'well-coordinated' support across the partnership. Some respondents felt that the introduction to the strategy should make our shared commitment to partnership clearer. Professionals raised concerns about how partnership working will be implemented in practice. Education professionals raised concerns about how work will be quality assured and held accountable. Healthcare professionals highlighted the importance of joint commissioning to lead well-coordinated work. Some education leaders asked about representation on strategic SEND groups.

Healthcare professionals raised a number of specific issues, including the need to address children with highly complex needs, and the importance of consistent messaging between services.

Healthcare professionals also suggested that the strategy should make specific reference to neurodiversity inclusion, supporting under 5s to access nursery placements, and include wording on 'empowering parents' to support their children. One healthcare professional noted their support for *'empowering parents to be able to have the resources themselves be able to support their children without feeling that it has to be a specialist or things have been done to them or for them rather than doing it themselves'*. Parent feedback reinforced this, expressing that they want to have access to information, training and resources to better support their children.

Young people highlighted the importance of co-production throughout the SEND service. Specific suggestions included recruiting young people with SEND as volunteers to help improve the Local Offer, holding termly Let's Talk SEND events to improve engagement, and co-producing leisure services with young people with SEND.

In engagement events with parents, parents highlighted that access to user-friendly services was a priority. Many parents did not know what the Local Offer was or had not heard of events targeted at parents such as Let's Talk SEND events. Access to information was particularly important to non-English speakers who highlighted that it was difficult to access information and services. For example, *'when my daughter was diagnosed in 2015, I had never heard that term [autism] before, it took a full year to understand this is a lifelong disability. So many parents are not integrated into the community, they don't know what's happening'* (parent at the Women's Inclusive Team event).

Community organisations further emphasised the importance of including culturally sensitive support under the priority of user-friendly services. Different organisations working with Bangladeshi and Somali communities highlighted the importance of independent advocates and parent liaison officers in building parents' confidence and understanding of the SEND system and supporting the relationships between parents and schools.

Parents agreed with the strategy's focus on timeliness. Parents also shared a range of experiences, emphasising the importance of the professionalism of staff and quality of services received across the SEND system.

Parents also highlighted the importance of Priority 5: Opportunities and support for young adults with SEND, noting that there is limited provision for over 18s. Educational professionals also noted concerns about the availability of provision for over 18s. Young

people also noted the importance of well-planned transitions into adulthood, including travel training, cooking, group therapy, and ongoing mental health treatment. For example, young people commented that it was important that they know their *'own rights and entitlements'* (Our Time Youth Forum).

Furthermore, parents shared feedback that they felt many children's centres and leisure and playpark facilities are not inclusive environments for their children. For example, one parent commented that *'the word inclusive is just being used'* (parent at the Women's Inclusive Team event). Somali parents also highlighted the importance of SEND inclusive environments that are also culturally inclusive, such as swimming sessions. Parents also highlighted that many youth activities provided by Tower Hamlets were only suitable for higher functioning children and young people with SEND. Specific issues highlighted included the need for fencing and gates in playground areas.

We also received feedback on the accuracy and clarity of wording in the draft strategy. Please see list of wording highlighted as unclear throughout the consultation in Table 3 below. In particular, education professionals provided conflicting opinions on the wording 'a great education'. 'An effective education' was suggested as alternative wording.

**Table 3**

<b>Unclear wording/jargon highlighted in consultation</b>
'Strong' leadership
'High quality case management'
'Proactive SEND Improvement Communications plan'
'Great education'
'Co-production meeting'
'Hosted system'
'Online SEN module'
'User friendly'
'Tower Hamlets Families Partnership'
'Children and Families Executive'



## Appendix A – Comments received on the measures

Priority	Measure	Comments	
1	Timely, effective and well-coordinated support for children and young people with SEND	Children and young people assessed by CAMHS within 5 weeks	<i>Is a 5 week wait realistic? Insufficient measures of quality</i>
2	Services that are user-friendly for children and young people with SEND and their families	Percent young people and parents who rate the Local Offer as good or excellent.	<i>'It's too infrequent to reply on an annual survey to know if the Local Offer is well-thought of and user friendly, there needs to be a more proactive approach, e.g. mystery shopper or focus groups that can help to shape a useful service'</i>
3	Early identification and support for the under-fives		<i>Priority 3 lacks comprehensive measures.</i>
4	A great education and support for every school-age child with SEND	% of children and young people with EHCPs being educated in Tower Hamlets. % of children and young people with SEN support and EHCPs who are excluded, subject to fixed term exclusion or on a reduced timetable.	<i>Do we want the percentages to be high or low?</i>
5	Opportunities and support for young adults with SEND	% young adults with EHCPs receiving education in Tower Hamlets	<i>Add a measure for employment. Measures are too limited</i>
6	A borough that welcomes and celebrates children and young people with SEND	Children and young people with SEND at a healthy weight.	<i>Healthy weight should not be something to 'celebrate', it should be a baseline. Unless weight is added to Annual Reviews, how will this be measured?</i>