

SEND review: right support, right place, right time

BATOD wants to understand your views on current draft thoughts to shape into a response to the green paper about the changes the Association would want the government to make to the special educational needs and disabilities (SEND) and alternative provision (AP) system in England

The Qualified Teacher of the Deaf (QToD) profession has long established evidence that our specialist role is a key fundamental part of the 'right support' for deaf* children and young people (CYP) from birth to 25, needed within the child/family-centred multi-professional team at many times from the point of identification, and in many places in addition to the traditional school environment.

These current thoughts have stemmed from discussions in the BATOD Steering Group and BATOD engagement with the attendees at the National Sensory Impairment Partnership (NatSIP) event on 11th May. Please read the information presented below. Let us know via exec@batod.org.uk if you agree, disagree and/or feel some other factors need to be considered.

BATOD would also encourage your school or service to also submit a response to the consultation. The consultation guidance emphasises responses do not have to be submitted for all questions

1. What key factors should be considered when developing national standards to ensure they deliver improved outcomes and experiences for CYP with SEND and their families? This includes how the standards apply across education, health and care in a 0–25 system. (Please refer to Chapter 2, paragraphs 4–5 6 for further details)

Clarity is required about the how the new standards would sit within the existing SEND framework and what they would replace. Clarity is also required regarding any impact on the existing Children and Families Act 2014.

The national standards should include clear, plain English, with definitions of inclusion and inclusive practices and be explicit in the involvement of the voice of deaf CYP and contribution from a diverse profile of needs to these standards.

BATOD is extremely interested in the development of the national standards and would welcome being involved for the context of deaf CYP and deaf learners with additional needs. This cohort is a low incidence but often quite high need cohort. It is vital the new standards enable users to capture the functioning need of individuals to enable effective tailoring.

New standards to cover

- Identification and assessment
- Appropriate provision

- Standardised processes for accessing and reviewing support
- Co-production
- Transition

The new standards should clarify how users match the universal (graduated response) with the tailoring for low incidence, high need, deaf CYP. Transitions need to allow for individual responses. The process must be outcome-focused with the family and CYP respected in the conversations about what they need. The processes should empower YP and allow them to have agency to influence their support.

Members – Do you feel there are existing standards that are effective for deaf CYP that should be considered by the working group who will create the national standards? If yes, please share with us the details so we can include them in our response

Early identification of deafness, access to meaningful sound by suitable amplification or cochlear implantation, and timely, appropriate intervention, including communication support and the use of British Sign Language where appropriate, are all essential foundations to language and future progress and attainment. The needs and development of CYP should be the priority when deciding a school placement.

The existing SEN Code of Practice highlights the need for co-production with specialist teachers with a mandatory qualification for children with deafness (QToDs) and vision impairment (QTVI), including multi-sensory impairment (QTMSI). QToDs need to be involved in all the areas aspired to in the new standards.

BATOD feels the development of national standards would be positive if they are setting out what should be in mainstream education for all learners ie SEN support and those with EHC plans. Specialist training, not basic deaf awareness, is required for low-incidence SEND across all sectors in education, health and care. The understanding of the implications of language deprivation on academic, social emotional and mental health due to deafness, the practice of inclusive teaching, reasonable adjustments based upon evidenced guidance relating to the CYP preferences, and how to address the gap between deaf and non-deaf cohorts is essential. In relation to the attainment gap, it remains vital that provision of suitable access

*deaf denotes all levels and types of deafness

arrangements for assessment is available to all. Mainstream schools need awareness of specialist support and how to access it. The proposal to include best practice in reasonable adjustments is welcomed.

Ofsted needs to upskill and be sufficiently trained with the expertise to accurately recognise the needs of deaf learners including those with additional needs.

There should be more accountability on local authorities (LAs) and schools to account for failings to deaf learners who have not been professionally supported to achieve their potential. Also, there should be accountability for deaf learners who have experienced multiple seclusions and/or fixed term exclusions due to behaviour needs that cannot be evidenced as unmet needs due to their deafness. This requires greater transparency for stakeholders in the data made available regarding factors that indicate unmet need.

Within educational settings this requires the involvement of governors who are trained in the understanding of deafness and able to represent the setting's accountability at stakeholders' meetings such as Children's Hearing Services Working Groups (CHSWG) and other bodies that implement Equality Impact Assessments.

BATOD very much welcomes the involvement of education, health and care in these standards, spanning the 0–25 system. It is important that all these strands are considered for accountability measures.

BATOD recognises the importance of access from the earliest age – point of identification – to appropriate qualified specialists, noting early years education is not restricted to specific settings but can also occur in the home and therefore the partnership of the caregivers is crucial. This underlines the need for increased numbers of specialist QToDs. Specialist support services/teaching services can already evidence the impact of home-learning programmes coproduced with caregivers of deaf children. It is disappointing that the role of specialist support services is not highlighted in the Green Paper.

The national standards should embed true coproduction with parents and CYP that encapsulates their views and have systems and resources in place to meet the diverse range of need within different cultural and economic community groups.

Quality assurance systems of accountability for all schools/academies and local authorities to meet need should be in place with an expectation for regular review that engages a range of stakeholders outside the organisation.

The development of these standards should draw upon currently used standards and documentation.

The national standards should reflect the holistic nature of education practices and therefore not require the removal of any incentive for schools in relation to only attainment table measures.

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? (Please refer to Chapter 2: paragraphs 6–12 for further details)

- The local partnership will coproduce a local inclusion plan that “will inform the local offer” SEND Review Ch.2 Para.9
 - Clarification is required about how new local SEND partnerships would look. Are there existing local SEND partnerships operating already in areas that align with the suggested ‘new’ model?
 - Clarification is required regarding the difference between these plans and existing local offers and how it is perceived they will inform local offers.
 - The new local SEND partnerships should have representation from deaf education and should draw upon existing partnerships that have proven successful outcomes for the 0–25 range eg CHSWG.

BATOD is interested in the development of the local inclusion plans and would welcome being involved for the context of deaf CYP and deaf learners with additional needs.

The local inclusion plans should enable strategic development of areas of need and must still be accessible and useful for deaf CYP and their families. They must aid transition with services including health.

Members – Are you aware of examples of practice that already achieve this? If yes, please share with us the details so we can include them in our response

Current SEN Code of Practice 6.60 “... The Local Offer should set out clearly what support is available from different services and how it may be accessed.”

BATOD feels there should be details of what has worked well since 2014. BATOD agrees that local authorities must continue to hold responsibility for high needs funding and to coordinate the local system. The plans need to enable local authorities to work together at regional commissioning level. The associated funds and responsibilities need to be transferred to bodies with responsibilities across regions. The related funds need to be protected for deaf CYP, recognising it is low incidence but a diverse heterogenous cohort. The unpredictable profile of the deaf/deafblind cohort should not be used as a rationale to divert the funding to other non-deaf/sensory impairment areas of need.

3. What factors would enable local authorities to successfully commission provision for low-incidence high-cost need, and further education, across local authority boundaries? (Please refer to Chapter 2: paragraph 10 for further details)

BATOD would welcome an increase in regional commissioning, eg for further education and for low-incidence SEND.

It is important that local authorities work together collaboratively to recognise when there is a need to commission some schools for the deaf or other specialist provisions that could not be created locally.

In relation to regional groups, for small local authorities it would be useful to explore the models of successful consortium models.

Members – Are you aware of examples of practice that already achieve this? If yes, please share with us the details so we can include them in our response

BATOD feels it is a matter of great concern that the post-16 cohort needs significant improvement as they do not generally access the high quality, evidence-based interventions from specialist teachers to whom they had access from the point of identification to when they were at school. The introduction of the newborn hearing screening has enabled many deaf babies and toddlers to access high-quality interventions for early childhood development. Specialist professional involvement is required through all phases to meet the changing needs of the child/young person, particularly in self-advocacy preparation. Therefore, the voices of CYP and caregivers are needed as equal stakeholders in the commissioning of effective services.

Members – Are you aware of examples of practice in the post-16 section that already provide effective QToD provision? If yes, please share with us the details so we can include them in our response

Whilst we recognise the reference to the role of local authorities in the document and in the White Paper, we regret that the provision of crucial specialist support services is absent from the document, which is unfortunate as there is a mandatory qualification for the roles associated with these services eg QToDs, QTVIs, QTMSI.

It is a matter of concern that the reference to the NPQ qualification for SENDCos is not expanded to refer to QToDs, QTVIs, QTMSIs. Additionally, the lack of QToDs is partly being addressed by the apprenticeship scheme plans but this alone is not sufficient (see page 46 section 29) as it will only address those teachers with posts within a service/educational setting. A workforce bursary is also essential to provide the training for those not able to access the apprenticeship scheme as they are not already working as a ToD.

There should be evidence-based learning from examples in different areas of the successful education, health and social provision for the low-incidence and high-need cohorts for SEN support and EHCP (Education and Health Care Plans) cohorts. There also needs to be recognition that the majority of deaf children are identified at birth, therefore support plans are required immediately, including EHCPs. Deaf children should not need to fail before moving to later stages of support. The local authority sensory support services can evidence successful longitudinal case studies of deaf CYP and their families. Some deaf CYP require

continuous support from a multi-agency body with the QToD specialist professional leading the transition stages as the dedicated transition worker that has supported them through their learning journey, from the point of identification on to employment or to higher-level studies.

How can it work and retain local budgets?

Why are school's policy operating separately from CYP/families and SEND? Is there a high risk of silo working three sets of policy?

It can offer economy of scale, support consistency of provision, and protect the specialist service.

It is felt this is not a new topic that has been discussed at length over the years without any advancement.

4. What components of the EHCP should we consider reviewing or amending as we move to a standardised and digitised version? (Please refer to Chapter 2 paragraphs 15–23 for further details)

BATOD welcomes the move towards standardisation of the plans.

The new digital EHCP template should be secure and easy to navigate and to access.

The Covid pandemic highlighted the digital divide in the nation and a new digital EHCP template must be accessible to all. Provision of technology will be needed for some families to engage with the new format, and no-one should be put at a substantial disadvantage in accessing information to produce, maintain and review plans. Need to consider accessible formats, eg adjustable font size, screen readers, translation, British Sign Language (BSL) interpretation etc.

The standardised and digitised version should be accessible to all caregivers and CYP, not just the majority. It should not be reliant on the educational setting supporting accessibility. The caregivers and CYP should be made aware of the role of a keyworker such as the specialist teacher and family support networks in order to ensure parents/young people (YP) are not unnecessarily overburdened with information and decision-making responsibilities. This requires equity of access and promotion of contributions from parents/YP.

It is vital the EHC plan accurately reflects the description of the CYP as an individual, their full range of needs, the provision and support they require, and the outcomes which the provision should help them achieve.

Clarity is required over the national protocols that will remove the existing barriers to electronic sharing between different agencies and the related security requirements.

There should be quality assurance of the process including the annual review meeting that involves stakeholders outside the organisation's structure to remove bias.

BATOD feels at the annual review meeting, the relevant

QToD should be invited and present. The specialist QToD can interpret the audiological and other specialist content in the absence of the professional representation from health fields.

Mandatory training of all SEND officers should be in place regarding understanding the needs and implications of low incidence sensory impairment needs.

There should be significant capacity within the LA SEND teams that are responsible for the EHCP process.

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? (Please refer to Chapter 2: paragraphs 24–28 for further details)

BATOD welcomes the inclusion of mainstream, specialist and independent educational settings that may be outside of the boundary of the local authority.

However, BATOD does not agree with the production of a tailored list of placements. Individual CYP need a place in provision that meets their specific needs.

Parents who are not confident in their knowledge of the local and national education systems should be made aware of support agencies to help them navigate the options.

6. To what extent do you agree or disagree with our overall approach to strengthen redress, including through national standards and mandatory mediation? (Please refer to Chapter 2 paragraphs 29–32 for further details)

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.

Neither Agree nor Disagree – In the absence of detail of the national standards, BATOD currently has no view on this matter.

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. (Please refer to Chapter 2: paragraphs 33–34 for further details)

BATOD queries "Are the current remedies effective in putting children and young people's education back on track?" To answer that question an analysis of CYP's outcomes is needed. Does the current system really work and provide value for money if the attainment gap for children with SEND remains so high?

In the absence of detail of the national standards, BATOD cannot comment further on this matter.

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? (Please refer to Chapter 3: paragraphs 3–5 for further details)

In addition to identified deafness, with the prevalence of glue ear in the early years and its impact on early language development, BATOD strongly feels the mandatorily qualified specialist QToD should be involved in the two-year-old progress check.

9. To what extent do you agree or disagree that we should introduce a new mandatory SENCo NPQ to replace the NASENCo? (Please refer to Chapter 3: paragraphs 21–24)

Strongly Agree, Agree, Neither Agree or Disagree, Disagree, Strongly Disagree

BATOD agrees with the introduction of the new SENCo NPQ for school SENCos. However, whilst increasing the number of staff with an accredited level 3 qualification in early years settings is a progressive step, the active involvement of the specialist ToD (post diploma graduate qualification) remains a crucial aspect within early years education provision (setting and home-based early years). It is a matter of concern that the reference to the qualification for SENDCos is not expanded to refer to and encourage the take-up of the mandatory qualification for QToDs, QTVIs, QTMSI.

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? (Please refer to Chapter 3: paragraphs 21–24 for further details)

Strongly Agree, Agree, Neither Agree nor Disagree, Disagree, Strongly Disagree

Agree – This should be a requirement of Headteachers and the respective Governor body. That role must work with the specialist QToD service to ensure support is in place as per each CYP's individual need.

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. (Please refer to Chapter 3: paragraphs 39–40 for further details)

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

BATOD has evidence from our membership base that academic settings with resource provisions for deaf learners are failing to employ the specialist QToD workforce that deaf individuals are entitled to access. Those academy settings are not transparent to parents and other stakeholders in their budget management of

local authority funding. They are opting to hire or promote unqualified support staff, and unqualified assistant SENDCo staff to undertake the work of the specialist QToD. There is a legal requirement for staff in the role of a QToD to have successfully completed their mandatory qualification within three years. There should be a mandatory expectation of any specialist or mixed MAT to be transparent in the revision of service level agreements for high needs funding provisions which should detail the budget expenditure for resource provisions ie a requirement that the school can demonstrate how it uses, monitors and reviews the use of funding or resources allocated to it for the resource provision to improve outcomes for deaf CYP. A quality assurance publication exists ie NDCS Quality Standards: Resource Provisions for Deaf Children and Young People in Mainstream Schools.

Members – Are you aware of examples of good practice who would be happy to be named? If yes, please share with us the details so we can include them in our response

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? (Please refer to Chapter 3: paragraphs 44–51 for further details)

BATOD feels this is a critical area in which there are recently created resources, training for professionals, including career advisors, and publications specific to deaf YP's needs designed and led by NDCS.

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? (Please refer to Chapter 4: paragraphs 8–11 for further details)

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

The definition of 'improved outcomes' expected from alternative provision schools needs to be transparent and co-produced with multiagency bodies external to the settings – not just the AP's employed experts in supporting CYP whose behaviour or other needs can present a barrier to learning. As deafness is often a barrier to learning for some individuals the specialist teachers and services should be engaged to ensure the provision is best focused on an individual's low-incidence needs.

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? (Please refer to Chapter 4: paragraphs 12–15 for further details)

BATOD has no strong views on this matter other than where deaf CYP are in these provisions that significant

funding and resources are made available to ensure the needs and support of this diverse population cohort, overseen and supported by a specialist QToD in conjunction with the alternative provision staff.

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? (Please refer to Chapter 4: paragraphs 12–15 for further details)

Neither Agree nor Disagree

In relation to a new national performance framework based on five key outcomes: effective outreach support – improved attendance – reintegration – academic attainment, with a focus on English and maths – successful post-16 transitions, BATOD would welcome having an involvement in the expert working group as the Association feels the role of the specialist sensory support services should be as an integral partner in the provision of quality alternative provision for CYP with a deaf profile.

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? (Please refer to Chapter 4: paragraphs 22–6 for further details)

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

In order to respond fully to this question, BATOD feels that there should be clear data on placements into and out of alternative provision for deaf CYP.

17. What are the key metrics we should capture and use to measure local and national performance? Please explain why you have selected these. (Please refer to Chapter 5: paragraph 14–20 for further details)

BATOD feels this is important and would align with the existing work undertaken by the Consortium for Research in Deaf Education (CRIDE). However, BATOD would request clarification on the detailed components of the key metrics.

18. How can we best develop a national framework for funding bands and tariffs to achieve our objectives and mitigate unintended consequences and risks? (Please refer to Chapter 5: paragraph 27–32 for further details)

BATOD would suggest a national agency to manage the high needs budget for all CYP with low incidence sensory impairment needs. That agency could work in a similar way to national specialist commissioning in NHS.

Consistency on the management of eligibility criteria, thresholds and levels of support is required. As well as greater consistency in the quality of support provided by existing LA specialist education services for deaf children.

Steps that embed the key principles within the Equality Act 2010 should be in place ie not using low attainment as a proxy indicator as deaf individuals would only receive support once they fall behind rather than access the evidence-based specialist teacher support to close the gap associated with deafness and provide the support they need to access the curriculum.

19. How can the National SEND Delivery Board work most effectively with local partnerships to ensure the proposals are implemented successfully? (Please refer to Chapter 6: paragraph 6–7 for further details)

BATOD feels the local partners engaged with the National SEND Delivery Board should have a diverse range of profiles that represent the profile of SEND. Therefore, BATOD would welcome involvement as a partner representing the low incidence but complex profile of the deaf CYP population.

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? (Please refer to Chapter 6: paragraphs 8–14 for further details)

BATOD believe that the low incidence of some types of SEND should be considered. Specifically, it is essential that any changes to SEND provision do not undermine specialist education services for deaf children. These are normally funded by local authorities through the high needs budget, employing teams of QToDs. Any shift from local authority towards academy-led provision would put these services under threat, unless there was specific separate consideration of how this would be funded (eg through a national agency).

Specialist education services for deaf CYP are at the forefront of early intervention for deaf children as are targeted interventions across all phases within the 0–25 age range. These specialist education services

- provide advice to families in the early years on language and communication, helping to ensure that there is a high-quality home learning environment for deaf children. Over 90 per cent of deaf children are born to hearing families who have no prior experience of deafness. In addition, half of deaf children are born deaf and hence are identified in the first few weeks of life through the newborn hearing screening programme.
- provide specialist, timely advice to mainstream education professionals as the child transitions through the education phases. As deafness is a low-incidence need, mainstream classroom teaching professionals may only occasionally be required to teach or support a deaf child. They are unlikely to retain any knowledge they may have acquired during initial teacher training. They are also unlikely to have the same level of specialist in-depth knowledge of deafness that can be provided through specialist education services for deaf children and would not have the capacity to deliver the targeted one-to-one specialist work that is delivered by QToDs. In addition, school-based staff lack the ability and expertise to

promote the specialist deaf-specific joint working between education, health and social care.

From the point of identification, specialist education services for deaf CYP work with parents, families, audiology departments, other health services etc supporting the individualised needs. These services already have the established professional input from the point of identification and therefore case history of individuals that enables effective targeted support and intervention across the 0–25 phases. Whereas school settings have information from the point of entry, they often lack the case history from the earlier years, particularly for SEND support cohorts. Services employ and maintain the ongoing CPD needs for the specialist teacher and support staff cohort and therefore, unlike schools, are not reliant on one specific person with some qualifications, or a small body of staff with an area of interest that may not reflect the needs of the wider deaf CYP cohort.

Members – Are you aware of examples of good practice who would be happy to be named as examples? If yes, please share with us the details so we can include them in our response

CRIDE reports continue to reflect that the majority of deaf CYP attend mainstream with the specialist provision in mainstream classrooms supported via the LA support services. Some deaf learners, often with additional needs, access provision through a resource bases/provision place. However, there is significant inconsistency in the model of provision. Some resource provisions use the funding to deliver bespoke QToD-led small group teaching particularly for the non-academic, social emotional development, language and life-skills development with targeted mainstream lesson interventions as suitable for each learner.

Members – Are you aware of examples of good practice who would be happy to be referenced as an example? If yes, please share with us the details so we can include them in our response

Other provisions only offer some of the resource-based provision funded learners a limited amount of QToD direct teaching input.

Members – Are you aware of examples of good practice who would be happy to be referenced as an example? If yes, please share with us the details so we can include them in our response

Members report some settings with poor standards are managed by SENDCos and higher level teaching assistants and the philosophy of the setting's senior leadership is strongly driven by academic grade outcomes.

Members – Are you aware of examples of good practice who would be happy to be referenced as an example? If yes, please share with us the details so we can include them in our response

The remaining deaf learners, a smaller percentage, are educated in special school provisions and are able to access bespoke therapy and life-skill provision.

Members – Are you aware of examples that reviewed and restructured their provision with QToD-input and interventions who would be happy to be referenced as an example? If yes, please share with us the details so we can include them in our response

The SENCO qualification, like the initial teacher training courses, do not train those QTS teachers in the depth of knowledge and understanding that is acquired through the specialist mandatory qualification for deaf education. There is a need for national level improvement with initial teacher training (ITT) provisions addressing the quality of content about teaching CYP with SEND but with the recognition that this will not make every teacher a teacher of deaf learners because of the low-incidence of SEND. Additionally, the brevity of the QTLS qualification route to teaching does not make every tutor a teacher of deaf learners in secondary settings nor college settings. This rationale also reflects why for low incidence it is not logical to disseminate funding per individual school. Support needs to follow the child; thus, a centralised specialist support service, responsible for maintaining a qualified teacher workforce specially qualified to work with the 0–25 deaf CYP cohort, is essential to support children with low-incidence SEND and to make the best use of resources. This is particularly applicable to deaf babies and young children still at home and in early years settings where it is proposed the SENDCos qualification level is at level 3 not at level 7 standard, which is mandatory for QToDs.

Similarly, the level 3 proposed for EY staff is not the equivalent to level 7 standard, which is mandatory for QToDs. With early identification established through LA specialist support services shortly after the newborn hearing screening stage, the specialist role of the QToD is particularly applicable to deaf babies and young children still at home and in early years settings and could not be replicated by school model provision through outreach.

National emphasis on increasing the focus on language and communication skills for children with SEND requires specific input for the specialist needs of LISEND cohorts.

The current post-16 funding system does not work well for deaf YP. Deafness is not a cognitive disability which means that most deaf YP, given enough time, can achieve level 3 qualifications in the same way as their hearing peers. As the majority of deaf YP do not achieve level 3 qualifications by the age of 19, there is a need to ensure post-19 funding works well for them. There needs to be better support for colleges to prevent deaf learners carouseling through a range of level 1 and over time level 2 courses because there are no employment opportunities for them and the college environment gives them, their families and possibly professionals, an option that is not unemployment. This requires further education settings to be properly resourced and facilitated, to offer rich learning experiences to their students with SEND more fully meeting their needs.

Members – Are you aware of examples of good practice who would be happy to be referenced as an example? If yes, please share with us the details so we can include them in our response

Inadequate preparation for adulthood training with YP with specialist multi-agency professionals will continue to leave YP ill-prepared in their understanding of housing, employment and continuing adult education and quite often remaining reliant on a supporting adult to make their decisions. Similarly earlier intervention training with the young person and associated professionals is required regarding student allowances to enable the young person to feel equipped and confident in their access at universities.

Members – Are you aware of examples of good practice who would be happy to be referenced as an example? If yes, please share with us the details so we can include them in our response

21. What support do local systems and delivery partners need to successfully transition and deliver the new national system? (Please refer to Chapter 6: paragraphs 8–14 for further details)

BATOD feels there needs to be strong ongoing collaboration with the specialist support services and relevant organisations to ensure successful transition and delivery for deaf CYP.

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

The paper lacks clarity about accountability, in particular to whom are MATS accountable?

The paper does not reference any publication of outcomes of the SEND review 2019.

It is good to see the White Paper emphasising the crucial role of LAs; however, BATOD feels there is insufficient reference in the green paper to the role of specialist support services, in particularly the role of the specialist QToDs.

BATOD feels the high need aspect of low-incidence SEND requires a ringfenced central budget not a notional school-based budget because with the low incidence nature of deafness it is impossible to predict how much funding is needed by an individual setting as some settings may have several deaf CYP in an academic period and another setting may have one or none in the same academic period.

The proposed banding system needs to take into account the low incidence but often high need nature of deafness.

The proposals do not reference the long term impact of the pandemic and how the aspirational 2030 achievement goals will be achieved. Clearer reference is required regarding how all provisions are required to meet the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) goals. ■



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