

Appendix 2

Draft Education Provision in North Somerset ~ A Commissioning Strategy 2021 – 2024

SEND Priorities

1. Background

1.1 The Education Provision in North Somerset ~ A Commissioning Strategy provides a summary of the relevant legislation and the roles and responsibilities of the Council, together with links to the Council's Corporate Plan and the People & Communities Directorate Plan. The Council's vision is to provide places for learning that provide opportunities appropriate to the needs of all members of the school and early years community.

1.2 North Somerset works to the principles that children are best supported when they live with their families and that all should expect a good/outstanding quality of education. Education should be based around the needs of the child, and where this can and should be supported within mainstream education, this ought to be the case. Many children and young people with Special Educational Needs or Disabilities are educated in mainstream settings. Others require specialist facilities only available in Special Schools or other forms of alternative provision. All pupils' needs are different. Some may require specialist support due to their different needs such as:

- Communication and Interaction - Children and young people with speech, language and communication needs (SLCN) have difficulty in communicating with others. This may be because they have difficulty saying what they want to, understanding what is being said to them or they do not understand or use social rules of communication. The profile for every child with SLCN is different and their needs may change over time. They may have difficulty with one, some or all of the different aspects of speech, language or social communication at different times of their lives.

Children and young people with Autistic Spectrum Disorder (ASD), are likely to have particular difficulties with social interaction. They may also experience difficulties with language, communication and imagination, which can impact on how they relate to others.

- Cognition and Learning - Support for learning difficulties may be required when children and young people learn at a slower pace than their peers, even with appropriate differentiation. Learning difficulties cover a wide range of needs, including moderate learning difficulties (MLD), severe learning difficulties (SLD), where children are likely to need support in all areas of the curriculum and associated difficulties with mobility and communication, through to profound and multiple learning difficulties (PMLD), where children are likely to have severe and complex learning difficulties as well as a physical disability or sensory impairment.

Specific learning difficulties (SPLD), affect one or more specific aspects of learning. This encompasses a range of conditions such as dyslexia, dyscalculia and dyspraxia.

- Social Emotional and Mental Health Difficulties (SEMH) - Children and young people may experience a wide range of social and emotional difficulties which manifest themselves in many ways. These may include becoming withdrawn or isolated, as well as displaying challenging, disruptive or disturbing behaviour. These behaviours may reflect underlying mental health difficulties such as anxiety or depression, self-harming, substance misuse, eating disorders or physical symptoms that are medically unexplained. Other children and young people may have disorders such as attention deficit disorder, attention deficit hyperactive disorder or attachment disorder.
- Sensory and/or physical needs - Some children and young people require special educational provision because they have a disability which prevents or hinders them from making use of the educational facilities generally provided. These difficulties can be age related and may fluctuate over time. Many children and young people with vision impairment (VI), hearing impairment (HI) or a multi-sensory impairment (MSI) will require specialist support and/or equipment to access their learning, or habilitation support. Children and young people with an MSI have a combination of vision and hearing difficulties

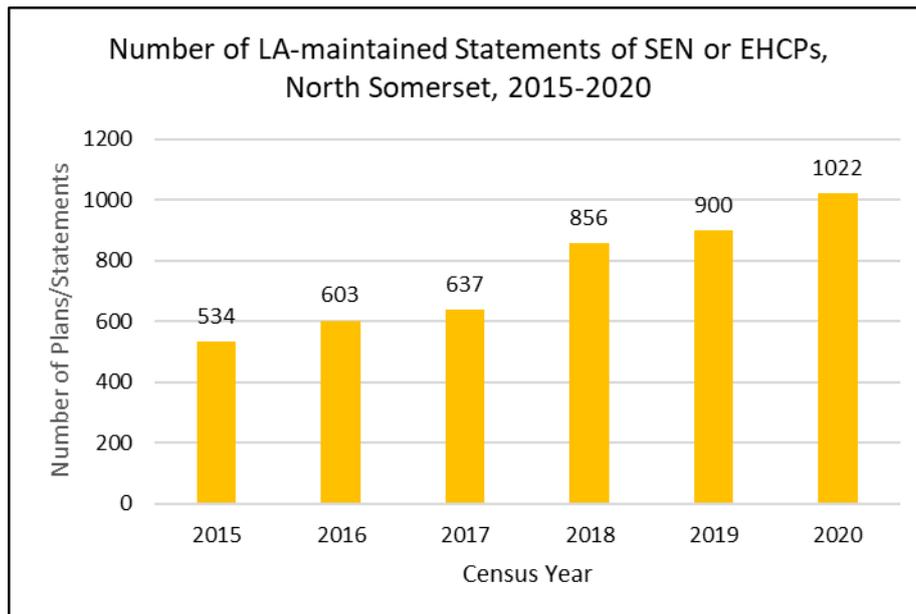
1.3 The Education Provision in North Somerset - A Commissioning Strategy~ 2018 – 2021 set out the delivery plans for SEND between 2018 – 2021 as below:

- To secure a 2nd site for Baytree Special School, increasing places for pupils with Profound and Severe Learning Difficulties from 72 to 120 places by the 2021/22 school year -
 - *The school will now cost in the region of £14.6m (£1m approved plus £13.6 provisionally added to the P&C 2021/22 Capital Programme to be considered by Council in February 2021), to be open by September 2023. The school will have the capacity to grow to c150 - 160 places as required over its 2 sites.*
 - *The planning application has been referred to the SoS for Homes, Communities and Local Government (HCLG) as the planning rules require Council's to do so if they propose to allow major development in the Green Belt or when there is an objection from the Environment Agency (EA) and the site is in a flood risk area. The SoS can either decide not to intervene and leave it to the Council to decide the application or alternatively he can call a public inquiry. If he does that the application will not be decided until after the public inquiry. The latter takes around a year.*
- To expand Westhaven Special School to accommodate 18 infant-aged and 10 post-16 pupils by September 2020 ~ complete. This statutory change also facilitated the increase of an additional places following a

site review that incorporated buildings previously used by another setting. The school now has a Place Value of 156.

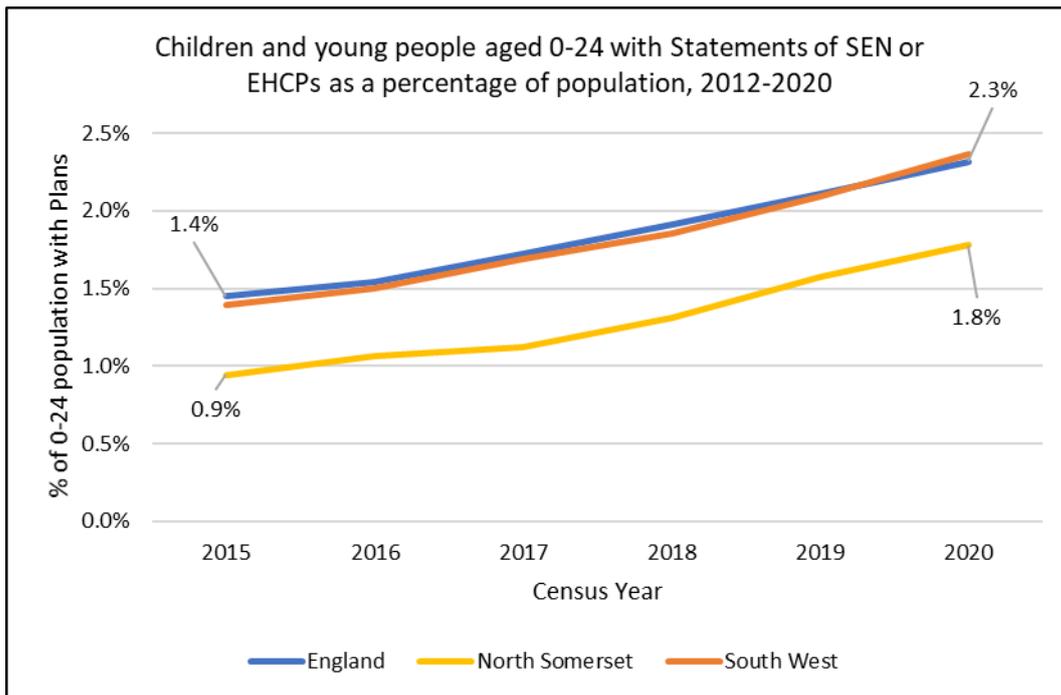
- *To create a 10-place primary phase High-Functioning Autism Resource Base at Mendip Green Primary School to open in September 2021 ~ following a supportive consultation, a request for approval was approved by the South West Headteachers Board in January 2021 as part of the approval process within the Regional Schools' Commissioner's office (RSC)*
- *To create a 10-place secondary phase High-Functioning Autism Resource Base at Nailsea Secondary school to open in September 2020 ~ complete*
- *To deliver breach admissions to the maximum levels allowed by legislation/can be accommodated on site without going against health and safety advice ~ ongoing with breach admissions at Westhaven, Baytree and Ravenswood schools in 2020*
- *Work with the DfE to deliver a 65-place SEMH School in Churchill by September 2021 (funding and timescales with the DfE/ESFA) ~ Learn@MAT was announced as the sponsor in July 2020 and the DfE are progressing the design stage of the build, to be available from September 2023*
- *To deliver extra accommodation at the VLC site in Milton to meet the needs of pupils requiring specialist intervention support – a planning application has been approved and it is hoped the building will be on site by Easter 2021*
- *New addition – to expand Ravenswood Special School to accommodate an additional c 28 – 38 pupils by September 2021 ~ a consultation took place in term 2 (2020) and a Public Notice was published in February 2021. A decision to this supported request will be submitted to the Council's Executive in April 2021*

- 1.4 North Somerset is experiencing an historically high demand for specialist educational provision in its schools. The number of North Somerset children with an Education, Health and Care Plan (EHCP) has risen from 534 in January 2015 to 1,022 in January 2020. This represents an increase of 91% over the last five years.



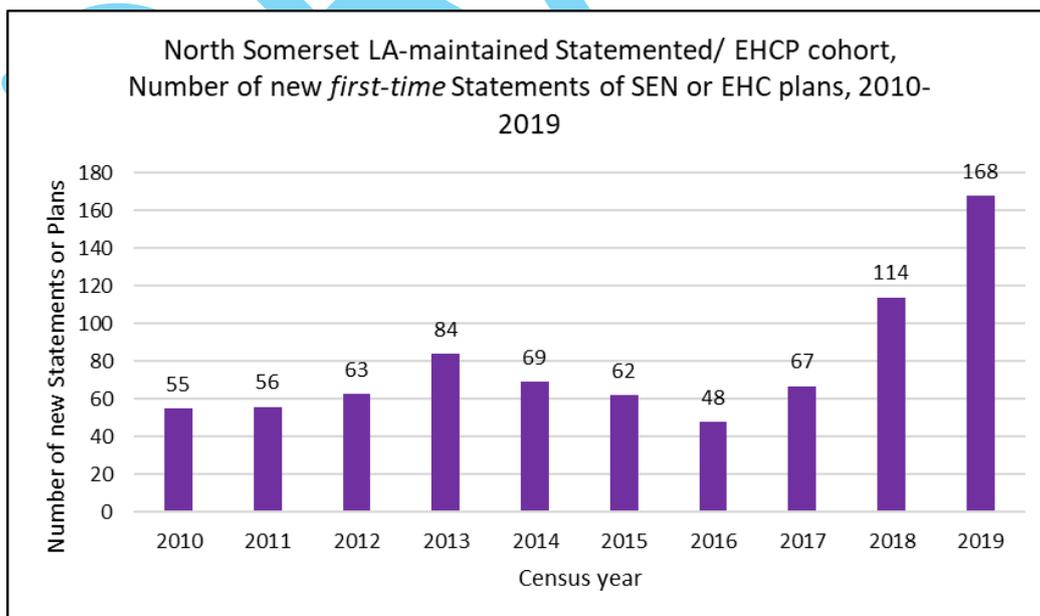
Source: Department for Education, Education, Health and Care Plans: England 2020 (published 7 May 2020) (underlying data).

- 1.5 Historically, North Somerset has been well below national and regional averages in the incidence of EHCPs in the 0-25 population. However, there is a consensus that the authority will start approaching the national average as the volume of EHCP assessments and issued Plans continues to increase.
- 1.6 The graph below shows the rate of EHCPs in the 0-24 population for national, regional and North Somerset in each census between 2015 and 2020. It is evident that although the incidence of EHCPs in North Somerset has risen at a similar rate to national and regional (+0.2% per year, every year since 2016), it has not yet increased enough to reach the national level. Regardless of whether the national incidence rate continues to climb or begins to level off, absent of a major policy change from Government, North Somerset is extremely likely to continue to face a similar level of increased demand over the next few years.



Sources: Analysis of DfE statistics (Education, Health and Care Plans: England 2020) and ONS population estimates. Actual percentages are shown for England and North Somerset.

1.7 Additionally, the number of children and young people in North Somerset obtaining new first-time EHCPs each year has more than doubled over the last decade, with the number poised to hit an all-time high by the end of 2020 – currently at 221 as at November 2020. In 2019, North Somerset issued 168 new first-time plans (compared to an average of 63 per year between 2010 and 2017).



Source: *ibid.*

- 1.8 EHCP assessment activity (the total number of assessment cases handled during the calendar year, including refusals and cases pending at year end) has also substantially increased and is not expected to decrease in the near future. In 2015, there were a total of 140 assessments processed for EHCPs; by 2019, there were a total of 468 – over three times the 2015 level. The assessment request refusal rate is also falling: from 40.8% in 2017 to 26.2% in 2019. Consensus among local area officers is that the refusal rate is likely to remain low as North Somerset approaches the national incidence of Plans in the population.
- 1.9 Conservatively assuming a 0.1% pa increase in the national rate of EHCPs, and assuming that the increase in demand that North Somerset is experiencing is likely to result in it reaching the national rate over the next few years, it is estimated that the number of North Somerset pupils with ECHPs is likely to reach over 1,500 by 2025.
- 1.10 As of Census Day 2020, only 77% of the 1,022 pupils with EHCPs were educated within North Somerset, with the remaining 239 young people educated outside the area, receiving alternative provision, or without a school place. It is North Somerset's aspiration to provide 'local schools for local children' by securing appropriate provision for pupils with EHCPs in mainstream and special schools as close to home as possible where practicable.
- 1.11 The table below shows the estimated number of the projected EHCP cohort that are likely to need places in North Somerset schools and out-of-area settings from 2020-2026 (based on placement trends observed in the previous five years' SEN2 census data):

Projected NS EHCP pupil demand by provision

	2020	2021	2022	2023	2024	2025	2026	Current capacity	Potential capacity
Baytree	136	144	151	146	139	140	143	72	160
Ravenswood/Westhaven	309	353	399	419	439	443	444	268 - 275	290 - 296
New SEMH School	0	0	114	128	143	144	145	0	65
NS mainstream hubs – Mendip Green x2/ Castle Batch/Nailsea Secondary	17	20	23	25	27	27	27	41	51
NS mainstream	182	207	233	244	255	256	258		

OOO non-specialist	33	38	43	47	49	49	49		
NS Post-16 mainstream	171	198	224	233	245	246	249		
OOO Post-16 special	36	42	47	51	56	56	56		
Total projected EHCP students	1030	1178	1328	1394	1457	1466	1477		

1.12 Against this backdrop of increasing demand, the numbers of available local places were set at 296 across the 3 North Somerset Special Schools (excluding our Pupil Referral Unit) as at September 2018. With the changes currently implemented as at September 2020 our three special schools will be admitting c364 pupils (with schools breaching their admissions up to the maximum amount permitted). Nailsea School opened its resource Base for an additional 10 pupils in September 2020 too.

If the SEMH school is able to open in September 2023, 65 new places will be created. The delivery of a 2nd site for Baytree Special School, subject to approval, will provide an additional 48 places overall, although the sites could grow to a maximum capacity of 85 places in Clevedon and 72 in Weston (157 overall), subject to consultations. It may be possible to expand Ravenswood Special School, subject to a review of the site, sufficient capital resources and a successful consultation. A first phase expansion consultation for Ravenswood has just completed and received excellent support.

Delays or refusals to the expansions of Baytree Special School and the new SEMH school would reduce the numbers of new places available locally for pupils with profound or behavioral needs by between 130- 150 learners (when both sites are at full capacity). Demand for placements outside the district will continue to rise if further placements are not be found locally.

1.13 There has been a significant increase in the numbers of pupils with complex social, emotional and mental health (SEMH) needs. Schools are increasing becoming unable to continue to accommodate many of these children within mainstream settings. As a result, and following a successful Free School bid in 2018, the Council is working with the DfE to deliver a new 65-place SEMH school by, we hope, 2023.

Alongside this new provision there is a need for 'move in, move out' support to assist pupils who require short-term interventions either before being fully integrated back into their mainstream provision, or in preparation for fully specialist support at the SEMH or other settings. The Council will work with the SEMH Sponsor, colleagues at the VLC and with local MATs to ascertain how best to provide for this need locally. One aim could be to have SEMH hubs attached to primary and secondary schools in every school cluster.

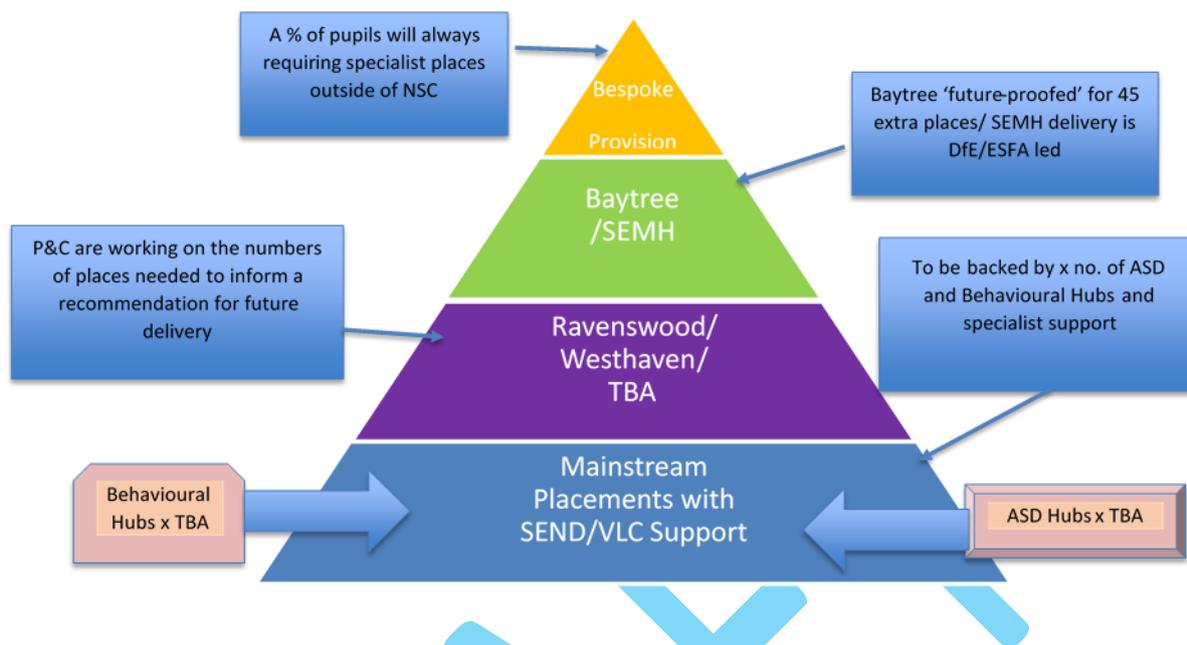
1.14 Covid -19 requirements and the end of a current lease agreement means that a review of the two buildings used by the VLC may now be required. The co-

location of buildings to serve the range of support provided by the VLC, which could be expanded to include short term placements for students remaining on roll in mainstream settings, proactive Thrive or SEMH interventions, placements for PEX students, as well as medical tuition across the primary and secondary age-range, would be best provided together in a part of the district where the majority of the students reside. The review should look into the option of a new site with significant co-located indoor and outdoor facilities, noting that this could only be progressed if significant capital funding were to be made available.

- 1.15 Funding for maintained special schools comes from the High Needs Block of the Dedicated Schools Grant (DSG). This funding stream is experiencing unprecedented levels of increasing demand, driven by significant increases in the number of children with Education Health and Care Plans (EHCPs) who require specialist provision. In the previous school year 2019/20, this manifested itself, for example, in a 30%+ increase in estimated spending on placements in independent non-maintained special schools. At this stage, the DSG deficit is expected to reach at least -£6.25m by the end of the 2020/21 financial year. Whilst some additional funding has been provided by the Department for Education, it is not expected this will be sufficient to offset increases in demand and the reduction in the amount of funding that will be transferred from the Schools Block of the DSG.

The need for additional local provision is proven, and financial modelling indicates that providing local places in maintained special schools is much more cost effective than provision in independent non-maintained special schools. In addition, it is likely that there will be some transport cost reductions, although the extent of these will be dependent on individual children.

- 1.16 There is no specific capital funding regularly paid to Local Authorities to create places for pupils with SEND.
- 1.17 A pyramid of provision is being developed and work to determine exact numbers and locations of all necessary extra facilities is a priority going forward, ready for the consultation and updating of the next Commissioning Strategy. Much of what's needed for SEND pupils will, however, be required before the current plan's expiry in 2021.



1.18 North Somerset held an Inclusion Summit on 30 November 2020 with a focus on provision for North Somerset’s most vulnerable children and young people - those with Education, Health and Care Plans (EHCPs) and those who have been permanently excluded (PEX) from schools. The Summit brought together all the organisations and groups within North Somerset with the resources, power and influence necessary to bring about an improvement in systems and provision to meet the needs of these young people: education, health, police, probation, the Local Authority. There was a real recognition that these are our children and we all have a shared responsibility for them and that the interest of the child and the family should be placed at the centre of the provision. The Inclusion Summit’s ideas will now be taken forward by the Children’s Improvement Board and the Education Excellence Partnership Board, where work will continue to develop and strengthen the contributions from different services and groups to develop provision, which is designed to meet the needs of these young people and their families.

The SEND Summit Recommendations were as below:

- i. Develop a stronger approach to multi-agency and cross Multi-Academy Trust (MAT) working
- ii. Develop a stronger system-wide awareness of the implications of childhood trauma for the ration of provision and discussion and debate about the nature of best practice
- iii. Take collective responsibility for the development of new provision focused on data informed patterns of need
- iv. Further clarify and strengthen the Education Health and Care Plans (EHCP) process to include communications with parents and the respective roles and responsibilities of all parties, the writing of realistic

and clear plans with and alongside a deepening understanding of the relevant laws and guidance, and what constitutes a reasonable set of expectations

- v. Recognise and prioritise the importance of early intervention
- vi. Take steps to secure greater consistency of commitment to, and provision, for high quality practice in mainstream schools in relation to the needs of the target group
- vii. Secure a stronger formal commitment to the inclusion agenda from all stakeholders
- viii. Create a North Somerset cross—phase community of expert SEND practitioners tasked with the development of best practice, recognition and building on the considerable local expertise that currently exists
- ix. Co-ordinate the work of the Children’s Improvement Board (CIB) and the Education Excellence Partnership Board (EEPB) to ensure this agenda is taken forward with a conscious focus on system leadership and system improvement

1.19 To enable a strategy for SEND for the next [10 ?] years to be formed, the following Principles and Actions could be recommended for adoption – these are first thoughts only:

- Principle 1 – Our default position will be to support Inclusion in a mainstream setting where it meets the needs and best interests of the child, noting that this needs to come with the right level of support (financial and social). This will always be the first consideration in any pupil placement
- Principle 2 - The Council will work to a Community Base Model – supporting a ‘Local (nearest) School for Local Children’ where appropriate. Children are best served when they can live at home with their families. Where there is more than one school or base able to meet a pupil’s assessed needs available locally, there is an expectation pupils’ will attend their nearest school
- Principle 3 - We will work with schools and the RSC to ensure parity of provision across similar settings so that pupils can access a good/outstanding school in buildings and surroundings that enhance their learning opportunities
- Principle 4 - Equality of opportunity for all – schools will not share separate messages for those who may have different needs. No family should be encouraged to look to other institutions to meet mainstream placements where their local or preferred school should be able to accommodate their needs. All mainstream school should be able to provide inclusive education regardless of their size or location
- Principle 5 – we will ensure the sizes of our special schools allow for effective management, stress-free environments and maximum opportunities. For most schools this will mean a maximum size of between 150 and 200 places. Pupils should be taught in classes of between 6 – 8 pupils per class when their needs are profound, or between 8 – 12 per class where needs are complex. Most mainstream settings

should be able to include pupils with SEND within their existing class bases.

- Principle 6 – The LA is the Commissioner of school places. It will actively advise schools and other establishments of the provision that is needed, and will share plans for expected future needs with a wide range of potential providers
- Principle 7 – all partners (education, health, care) should make adequate and appropriate contributions to the costs of placements or of other support needed to secure children’s attendance in order to meet all needs identified in Education, Health and Care plans
- Principle 8 - Top-up funding is only used as an intervention where mainstream schools are supporting additional needs as part of a Graduated Response. Special schools and specialist hubs should receive appropriate place funding by default.
- Principle 9 - we should ensure that children and young people with SEND gain maximum life chance benefits from educational, health care and social care and have the opportunity to achieve their full potential
- Principle 10 – we will use quantitative and qualitative needs analysis to identify current and future needs and unmet needs of children and young people with SEND and their families and to understand what is important to children, young people and their families
- Principle 11 – we will aspire to enable children, young people and their families to have a choice relating to the education they can access within the local area
- Principle 12 – Students should be able to sustainably travel to a placement within the DFE regulations and adopted North Somerset Council Home to School Transport Guidance

1.20 To support these principles, the following actions may be needed – subject to consultation and approval:

- Action 1 - Support for the family is part of the solution for many pupils. It can remove barriers to learning and ensure the pupil is ready to learn at the start of the school day. Schools are a key part of the North Somerset Early Help offer and they work with families to prevent their needs escalating, referring to services at a higher level of need where this is necessary
- Action 2 - Training and Support – the Council will, funding permitting, work with Teaching Schools and Specialists (including our special schools) to provide training and support to help mainstream school staff understand the develop the skills necessary to accommodate fully the needs of pupils with SEND within their settings and after school. This may include:
 - Support to develop HLTA specialists to work with pupils with behavioural challenges
 - Short-term intervention and reintegration programmes within Hubs attached to mainstream schools, supported by the VLC, MATs who are specialists in Inclusion and our SEMH colleagues

- Advice and guidance to teachers about how to integrate specialist techniques into their lesson deliveries that engage those who may be disenfranchised with more standard approaches
- Assisted technology and telecare support, engaging with schools and parents, to prepare pupils in school for their transition to adult independence where possible
- Action 3 – the LA will promote the many opportunities available for employment working alongside pupils with SEND. This will include the promotion of higher-level qualifications to those working with SEND pupils so staff are fully equipped and experienced in what can make a difference to a pupil's outcomes. The LA will employ Advisory Teachers who will work alongside schools experiencing challenges so that strategies to meet the needs of the child can be deployed
- Action 4 – Mainstream schools should be encouraged not to remove a pupil with SEND or Behavioural difficulties from their roll. They should instead work with the LA to identify suitable Alternative Provision until a more suitable school is identified or is available unless they are able to evidence that, with appropriate help and support via the Graduated Response approach, the needs of the child can no longer be met. All pupils should have had the opportunity to attend a specialist hub and the school or MAT should be able to show that staff have received appropriate support and guidance before any 'off-rolling' is supported. Schools who are not Inclusive will be reported to the RSC.
- Action 5 – The LA will review the use of Top-Up Funding and will consider how a link to the achievement of specific outcomes may better support meeting children's needs within school. This will help advise on the best practice with using high needs funding within schools.
- Action 6 – the LA will specify its requirements and required outcomes when commissioning all new schools or pupil placements. This may require challenging conversations with education providers to ensure we have an appropriate mix of provision in North Somerset.
- Action 7 – the LA will undertake a review of parent's preferences for particular schools or setting types in order to inform our commissioning of local school places
- Action 8 – The LA will consider any investment or 'Invest to Save' proposals where the outcome supports inclusion or the local delivery of SEND provision
- Action 9 – the LA will review the outcomes of the existing Resource Base Hubs to inform future delivery options
- Action 10 – The LA will embed the impacts of transport in the EHCP process to ensure there are no detrimental impacts when commissioning or managing a placement

1.21 Capital schemes to support extra SEND provision during the life of this plan could be:

- Action 1 - To deliver the expanded Baytree School in Clevedon for 65 pupils. The site has a built-in capacity to expand to 85 places when required

- Action 2 – to review the capacity of the current Baytree site to secure extra places. The site could accommodate around 75 extra ambulant pupils with PSLD
- Action 3 – deliver c 28 – 38 extra places at Ravenswood, subject to Council approval, by expanding the school permanently into parts of the now-redundant VLC site in Nailsea
- Action 4 – continue to review the uses of the now vacant VLC site in Nailsea. Whilst initially this site may have some temporary usage, in the future it could facilitate new provision (see Action 10 below)
- Action 5 – to look at the provision of facilities at the VLC with an option to seek out funding for the co-location of facilities onto a new single site in or close to Weston super Mare, funding permitting
- Action 6 – review the need for more places for pupils with MLD. This could include the following options:
 - A new site and 65-place school – location to be agreed
 - A land swap with an existing school if primary demand were to continue to reduce and the creation of new schools in areas of residential growth could incorporate the move (and expansion) of an existing provision. This would be subject to developer approval, confirmation such a move would not compromise future developer contributions and sufficient funding
 - A further expansion of Ravenswood School onto the VLC's vacant land in Nailsea
- Action 7 – to work with the DfE who plan to deliver the SEMH Learn@MAT school for 65 learners at Churchill to open in September 2023
- Action 8 – to seek to deliver a temporary provision for SEMH pupils, either at the vacant VLC site at Nailsea or, with the support of other schools, at another site within the district by September 2021
- Action 9 – review the success of the ASD hubs at Nailsea School and Mendip Green Primary with an option to create an ASD hub for primary and secondary provision in vacant classrooms across every cluster over the next 10 years
- Action 10 – The creation of Hubs to support short-term placements for those with behavioural challenges in vacant classrooms across every cluster over the next 10 years
- Action 11 - to review the use of the vacant VLC site at Nailsea. This could include options such as below:
 - all or parts of the site could be transferred to the ownership of Ravenswood to enable the school to expand to accommodate extra pupils – up to 200+. There is excess demand for more MLD places across North Somerset.
 - The site could be developed to create options for the potential development of residential units/assisted living for young adults aged 19 – 25 as part of their transition from teenage years into adulthood. This could include a transition unit attached to Ravenswood School so that students could be supported whilst at school.

- Traditionally the view has been that the incidence of needs has been too low to efficiently provide for residential provision locally, but the current spend and placement figures suggest that this position may be changing. The site could be used to support the creation of an on-site Children's Home for TBA pupils aged 8? – 19.
- The land could be used to create a new small Residential School and an expansion of Ravenswood. A new entrance for Ravenswood could utilize 50% of the site, with opportunities for the remaining 50% to be agreed.
- The land could be made available to a local partner provider and NSC commission places as required

Review:

Do you agreed that finding additional SEND places will be a priority for the 2021 – 2024 strategy?

Do you agree that the principles and actions in 1:19 above are the right values and next steps?

Do you agree that the actions shown in 1.20 above are the right priorities for exploration and delivery, subject to funding?

Do you agree that the capital schemes identified in 1.20 will start to address some of the identified needs across North Somerset?

Is there anything you or your organisation could do to support these principles and aims?