

24 June 2022

Dear Sir/Madam

**CSSC response to the Education Authority's public consultation on specialist provision in mainstream schools - Pilot 2: Addendum, May 16 2022.**

CSSC welcomes the opportunity to contribute to consultation on the Education Authority's Specialist Provision in Mainstream Schools: Pilot 2 addendum, 16 May 2022, which seeks approval of temporary Specialist Provisions to permanent Specialist Provisions. CSSC notes that as an addendum to Pilot 2, based on the SEN pressures and need for suitable placements for September 2022, the Education Authority is taking forward proposals to establish an additional 34 specialist provision in mainstream (SPM) classes and key stage pathways in 15 schools, 7 of which are controlled schools.

CSSC notes that on 21 June 2022 the Minister of Education approved the provision of 128 Specialist Provisions across 58 Mainstream Schools as part of the Special Educational Needs Area Planning pilot exercise. Following conclusion of this consultation an 'Addendum Consultation Report' will be submitted to the Minister for consideration. CSSC, having provided substantive responses to the previous specialist provision pilot consultations published by the Education Authority notes that this approach is approved by the Minister in the absence of full implementation of the SEND Act (2016) and that Act's provision for an Annual Plan of Arrangements for SEND.

CSSC has consulted with controlled schools to inform this response and welcomes the opportunity to make representation on behalf of individual controlled schools and the sector as a whole.

CSSC is supportive of all specialist provisions proposed as part of the addendum to Pilot 2 and notes the associated progression of specialist provision pathways in many of these schools (i.e. Key Stage 1 to Key Stage 2 or Key Stage 3 to Key Stage 4).

Many of the key issues raised in CSSC's response to the previous Pilot 2 consultation remain relevant and valid and while this response will, in the main, focus on issues raised by the current cohort of schools for whom specialist provision is proposed, CSSC would refer the Education Authority to Appendix A which includes the response to the initial Pilot 2 consultation and makes relevant comment which includes, but is not limited to, the following key areas: -

- Facilitating collaboration between special schools and specialist provision staff

- Support for long-established specialist provisions in mainstream schools
- Supporting the response to challenging behaviour
- Supporting appropriate pathways post-16
- Support for the emotional health and wellbeing of specialist provision staff

Additional comment is provided below in relation to issues raised during Pilot 2 Addendum consultation discussions.

### **The importance of the physical environment to ensuring a quality educational experience**

In consulting with the leaders of controlled schools for whom specialist provision is proposed, CSSC is aware of concerns in relation to the physical environment which include making sure that accommodation is fit for purpose and ready for a September 2022 implementation but also concerns in relation to the long-term impact on schools' available accommodation. One Principal referred to decisions regarding the restructuring and repurposing of rooms being taken without the relevant officer having visited the school or having given the Principal an opportunity to inform these decisions and explain the likely impact of proposed changes to the existing school accommodation.

CSSC understands the importance of the physical environment in relation to providing a quality educational experience and is in agreement with the EA's criteria that accommodation should be fit for purpose to enable specialist classes to be integral to the school. CSSC is aware that some of the proposals refer to the creation of appropriate pathways in schools which will not necessarily be in place in September 2022 but will be a reassurance for parents that their child will be able to remain in the same school for the entirety of their primary or post-primary education.

CSSC notes the Education Authority's proposals plan for a phased and managed implementation of the provisions across key stages and CSSC is aware that many Principals conscious of the need to accommodate the provisions within the existing school build (to ensure appropriate inclusion) will consider locating older year groups in modular accommodation to make best use of existing accommodation. One Principal, however, noted that the current modular accommodation on site would not be fit for the P6/P7 pupil cohort and that new modular accommodation will be required. Principals have referred to verbal assurances received from EA officers in relation to minor works applications that can be made on the school's behalf in those circumstances, however, schools are concerned that securing minor works to school accommodation can be a lengthy, drawn out process with competing demands for finite and often limited resources. While CSSC is aware that the process for delivering minor works to schools accommodating specialist provision will not rely on a new call for minor works applications, and, will be progressed through a separate process, schools are concerned, despite assurances to the contrary that accommodation may not be ready in a timely manner.

### **Specialist provision which meets the needs of pupils with severe learning difficulties (SLD)**

CSSC notes that while the Pilot proposals in the main relate to the establishment of Learning and Social Communication classes that two of the proposals will make provision for pupils with Severe Learning Difficulties (SLD) across Foundation Stage and Key Stages 1 and 2 and that this will be on a temporary basis for a fixed period, until 30 June 2025.

CSSC has previously highlighted the need to facilitate collaboration between special schools and specialist provisions, acknowledging the tremendous capacity for capacity building that this would provide. One school for whom specialist provision to meet the needs of pupils with SLD is proposed has spoken highly of the welcome and effective support from a nearby special school in establishing this provision and another in the same situation spoke of plans to receive similar support. Continued resourcing of opportunities for both schools to collaborate and receive support from special schools with the relevant expertise is crucial as are assurances that the provision will be reviewed within the committed timescale.

CSSC understands that the establishment of specialist provision to meet the needs of pupils with SLD represents a response to localised pressures but will use this opportunity to highlight the need for additional investment in the special schools estate to ensure that the EA is able to realise its vision of ensuring provision 'for all children who require a place in a special school a placement at their nearest suitable special school.' While CSSC understands that support will be provided to ensure that these temporary arrangements are successful in delivering the vision, it is essential, going forward that all special schools can respond to the needs of children in their local area who require a special school placement.

CSSC is conscious that the support received by pupils in many special schools relies on a multi-disciplinary approach involving both Education and Health professionals with access required in some circumstances to specific specialist therapies. The Education Authority must proactively communicate with Health and Social Care Trusts on behalf of these new temporary SLD provisions regarding the support required for pupils and that the training received by the staff in special schools, where appropriate, should also include the staff of specialist provisions working to meet children with SLD. Supporting children with SLD represents an unknown experience for these schools and the support required includes not only consideration of specific training for staff but will also impact on considerations for accommodation to include intimate care facilities.

## **Building the capacity of specialist provision staff**

CSSC in consultation with named schools is aware of significant support received by schools from the Area Planning Team and Children and Young People's Services' Specialist Settings Support Team which has been welcomed by schools. Schools with existing provision have referred to EA officers carrying out a skills audit and progressing relevant training and also to effective cluster working with staff from other specialist provisions. CSSC, must, however emphasise that the experience across schools is not consistent. One Principal noted that while the school has received verbal assurances that training will be provided, at this late stage in the academic year no meeting has been arranged to discuss with the Principal the nature of the training nor its frequency. The Principal is also mindful of the need to discuss action plans with the Statutory Assessment and Review Service (SARS) for children who will attend in September 2022 and is eager for this work to commence. CSSC understands that the school's concerns relate to their aspiration to effectively support the transition of pupils who will attend the specialist provision in September 2022 and at this stage in the academic year the school would like to be in a position to meet with children and parents in order to provide the same transition support that pupils will have received.

A key issue raised during the current consultation was concerns about training for the whole school community, teaching and non-teaching staff, which will allow for every member of staff to support the inclusion of the child as specialist provision staff work to prepare pupils for potential integration into mainstream classes. While this type of training may rely on a dissemination model it is crucial that consideration is given to adequately addressing the training needs of staff to support the wider integration and inclusion of SEND pupils. Schools were also keen to emphasise that the training provided needs to be responsive to the needs of the individual child which may change within individual settings on an annual basis and will also need to take into consideration the potential for staff changes within schools.

## **Working with school leaders to support the parents of children with SEN**

CSSC, from engaging with the leaders of mainstream schools with specialist provision already in place or proposed, is conscious of the significant role that staff perform in supporting the parents of children with special educational needs. Principals noted that the emotional health and wellbeing of parents will have been impacted over time by, what for some, is the difficult process of securing support for their child's specific need and some parents can present with a mindset that is negative based on what they perceive has been the struggle to ensure the most appropriate support for their child. Schools require more advice and guidance in relation to how to support the parents of children attending their specialist provisions.

CSSC is conscious that the SEND Strategic Development Programme (SEND SDP) sets out a commitment to engage with the parents of children with SEND and the Education Authority will rename and relaunch the programme as a means of seeking to ensure that parents are

reliably informed of the various SEND programmes being progressed. CSSC is conscious that the SEND SDP is engaging in stakeholder engagement which involves the leaders of schools

across all phases of education and it is crucial that the views of school leaders and specialist provision is able to inform the type of support, advice and guidance which is made available to the parents of children with special educational needs.

Principals have spoken of the difficulties in convincing parents of the potential merits of deviating from the traditional adult assistance model as a means of supporting children with a statement of special educational needs. It is therefore crucial that parents are supported and appropriately informed of the type of provision that their child will receive and will most benefit from. EA officers engaging directly with parents on the sites of mainstream primary schools with specialist provisions could be an effective means of delivering key messages about SEND provision that the leaders of mainstream primary schools with specialist provision would wish to communicate to parents.

### **Progressing specialist provision which meets the need of deaf pupils**

CSSC is conscious that the focus to date has been on establishing Learning and Social Communication classes in mainstream primary and post-primary schools and that while addressing shortfalls in pre-school education in special schools has been a priority for the Managing Authority there has been no progress in relation to progressing specialist provision in mainstream pre-school provision.

Whilst it would not be customary to refer to individual schools in its response, CSSC notes that a unique opportunity presents at Cregagh Primary School, a controlled school which facilitates two hearing impaired units and which has aspirations to introduce pre-school provision for hearing impaired children who may find mainstream pre-school provision challenging.

The school has accommodation to facilitate this provision and staff have the specialist skills to support this type of provision. CSSC would encourage the Education Authority to explore the potential for establishing such provision at the school, provision which has the potential to better support the deaf child's transition from pre-school to Foundation Stage. CSSC is keen to ensure that this unique opportunity is not lost for the children who could benefit from this specialist provision.

## **Ensuring clear communication and a co-ordinated approach to supporting specialist provisions**

CSSC is concerned by the perceived lack of a co-ordinated approach across the relevant EA departments which will support schools to establish specialist provision.

The annual payment of £3,000 per class is welcomed by schools, however, Principals referred to a lack of detailed guidance re budget codes for processing school's expenditure on resources which will ensure the sustainability of the provisions. Ensuring that this expenditure is accurately accounted for in the school's budget can be a time consuming exercise if the relevant codes are not readily available to school leaders.

While the Principal of one setting for whom provision will be made for pupils with SLD spoke highly of the advice received from Recruitment and Resourcing, a number of schools have expressed uncertainty about the recruitment process and concerns about recruiting to post in time for the proposed establishment of the provision. While Principals referred to verbal reassurances from EA staff regarding the successful recruitment of suitable candidates to post, Principals understandably are concerned at this stage of the academic year that appointments are yet to be made. One Principal referred to delays in receiving the relevant paperwork/permissions to progress recruitment which has led to inevitable delays in securing staff and arranging for the necessary and relevant training. These circumstances also present as an additional workload for Principals as they seek to resolve such issues.

CSSC is conscious that a number of school leaders who facilitated specialist provision effective from September 2021 spent a significant amount of July and/or August 2021 preparing for the effective implementation date of September 2021 because of delays experienced during the preceding Summer term. Principals consulted with during this current consultation voiced similar concerns about the prospect of preparatory work during the holiday period after what has been another challenging year for school leaders.

CSSC is also concerned that schools are not fully informed that it is EA who will decide on admissions to the specialist provision with some school leaders under the impression that they will be able to decide who attends the specialist provision in their school. One Principal was of the view that a number of children with a statement of special educational needs currently educated in the school's mainstream classes could benefit from attending the specialist provision which will be established yet no conversations to explore the potential for this to occur have taken place. CSSC is conscious of the increasing complexity of need presenting in schools and it is therefore crucial that opportunities are provided which allow schools to communicate their very real, valid concerns to officers from SARS and thereby provide SARS with the opportunity to offer support that will enhance the ability of a school to meet the specific needs of an individual child. While CSSC understands the pressures on ensuring sufficient places for children with SEN it is crucial that schools have the ability to inform placement decisions and, where there are concerns about a school's capacity to meet the needs of a specific child that conversations are facilitated that reassure the school

that they will be supported to meet the needs of the child with appropriate mitigations, advice and support that enhance the school's capacity to meet those needs.

### **Supporting the response to challenging behaviour is crucial to the successful facilitation of specialist provision**

Many of the concerns that schools have in relation to successfully facilitating specialist provision relate to the capacity of staff to respond to challenging behaviour. Staff in previous consultations have referred to how such challenging behaviour can include physical violence that the child, because of a range of needs and challenging sensory processing difficulties, can find difficult to regulate. Schools have referred to the need to receive training which will support staff to engage with interventions which will prevent harm to the pupil and to others. References have been made to the Team Teach model, an accredited training which CSSC is informed is no longer available to schools. Without accredited training staff faced with challenging behaviour lack the confidence to respond and feel vulnerable to litigious action. CSSC would reinforce our previous appeal to the Education Authority that if the Team Teach model is no longer considered appropriate as a means of behaviour management in specialist provisions that the Education Authority engage constructively with the Principals of schools with specialist provision to consult on suitable alternative interventions which will prevent harm to the pupil and others.

CSSC endorses the position articulated by Graham Gault, former President of the NAHT speaking on behalf of school leaders in December 2021 at the launch of the NICCY Review of the use of restraint and seclusion in educational settings. He referred to the need for a clear legislative position and guidance to support staff in their response to challenging behaviour and that this needs to be supported by appropriate resourcing and training for staff.

CSSC welcomes the Department of Education Review of Restraint and Practices in Educational Settings and understands that EA is informing this work. CSSC would welcome the opportunity to offer comment on any developing guidance for schools so that the experience of controlled schools informs and influences forthcoming support.

### **Reviewing the impact of additional provision on teachers' conditions of service**

CSSC understands that controlled school willingness to facilitate specialist provision is consistent with the sector's Open to All ethos and indicative of controlled schools' commitment to meet the needs of all children and to support the Education Authority's vision of providing improved opportunities for inclusion and integration of SEND pupils. It is

crucial, however, to acknowledge that managing additional provision can lead to an increased workload for leaders. In reviewing the experience of pilot schools in facilitating specialist provision CSSC recommends that the managing authority considers the impact of the additional provision on teachers' pay and conditions of service.

**Accommodation requirements limiting controlled schools' ability and willingness to facilitate SPM**

CSSC has previously highlighted the willingness of controlled schools to host specialist provision and support the Education Authority in meeting its vision for enhanced integration and inclusion of SEND pupils. In the context of CSSC's role on the Area Planning Local Groups (APLG) CSSC officers have referred the Area Planning Pressures Team to a number of controlled schools which have expressed a willingness to accommodate such specialist provision and to meet the needs presenting within different localities. CSSC is concerned, however, that in bringing forward expressions of interest to the Education Authority that schools' expectations of being possible sites for this type of provision are raised. It is therefore crucial that in developing a more strategic approach to planning for specialist provision that the Education Authority communicates clearly the level of need within a specific area and is able to provide an explanation as to why expressions of interest from settings which believe that they meet the required criteria and associated indicators for specialist provision are not progressed. Some controlled schools have expressed concerns that their aspirations to establish specialist provision are stymied simply because of limited accommodation with the unfortunate outcome that the school's clear commitment to inclusion, quality of education and strong leadership and management provided are overlooked because of accommodation pressures beyond their control.

CSSC welcomes the further extension of specialist provisions in controlled schools and is happy to discuss this response.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Mark Baker', with a large, sweeping flourish underneath.

Mark Baker  
Chief Executive



## **Appendix A – CSSSC response to EA consultation regarding specialist provision in mainstream schools Pilot 2**

8 April 2022

Dear Sir/Madam

### **Re: Specialist Provision in Mainstream Schools Pilot 2**

CSSSC welcomes the opportunity to comment on the Education Authority's Specialist Provision in Mainstream Schools: Pilot 2 proposals which seeks approval of temporary Specialist Provisions to Permanent Specialist Provisions. CSSSC notes that the Pilot proposals relate to 89 historic specialist provisions within 58 schools and the creation of 41 additional pathways in these schools.

CSSSC notes the publication of consultation documents specific to the each of the pilot schools and submits this response to be considered in the context of the proposals for specialist provisions which relate to the 24 controlled schools. CSSSC has consulted with controlled schools to inform this response.

CSSSC notes the October 2021 Ministerial endorsement of the Framework for Specialist Provision in Mainstream Schools and the associated Specialist Provision in Mainstream Pilot which were the subject of public consultation in October 2020 and to which CSSSC responded. CSSSC understands that the ministerial endorsement allows for a more flexible and agile approach that will facilitate the establishment, closure or change of Specialist Provision in Mainstream Schools without the need for the publication of a statutory Development Proposal. CSSSC, understands the important contribution of specialist provision in mainstream schools and the need to address regional inconsistencies. The statutory Development Proposal process does not have sufficient flexibility to be responsive within the challenging context of a changing and more complex profile of special educational needs. CSSSC notes that this approach is approved by the Minister in the absence of full implementation of the SEND Act (2016) and that Act's provision for an Annual Plan of Arrangements for SEND.

CSSSC notes that within Pilot 2 each school proposal has an associated Consultation paper which outlines the proposal assessed against the Specialist Provision in Mainstream Schools criteria and indicators approved in the Framework for Specialist Provision in Mainstream Schools to confirm compliance and continued need.

CSSC notes that in addition to regularising the historic (temporary resource) provision at mainstream schools established without a Development Proposal prior to 2020/21 that the Pilot will:

- assess the provision put in place under EA's emergency response in 2020/21; and
- bring forward proposals for 2022/23, if the SEND Act (NI) 2016 has not been commenced.

### **Expressions of interest from controlled schools**

CSSC understands that the establishment of temporary resource provisions in 2020/21 represented an emergency response. Working in partnership with the Education Authority, the Council for Catholic Maintained Schools and other sectoral bodies, CSSC understands that the draft Special Education Strategic Area Plan, which is currently the subject of public consultation, is an attempt to implement a more strategic approach to the establishment of specialist provisions in mainstream schools and to move away from the reactive approach which characterised the establishment of temporary resource provisions in 2020/21. CSSC would contend that in establishing the need for specialist provision that a clear rationale is provided with respect to where and in which school the EA proposes to establish that provision so that it is clear for Governors and Principals that they have been considered as possible sites for this type of provision. While CSSC understands that one of the objectives of Pilot 2 is to provide opportunity for interested parties (including affected schools) to have their views considered before final decisions are taken, it is crucial that going forward schools interested in facilitating specialist provision are able to inform the Education Authority's plans ahead of implementation. Some schools, for whom specialist provision is not proposed, have informed CSSC of their willingness to facilitate such provision. CSSC has communicated schools' expressions of interest to the Education Authority on a number of occasions and understands that these expressions of interest are held by EA's Area Planning Team responsible for Special Schools and Specialist Provisions. CSSC would emphasise in this context its support for all of the specialist provisions proposed as part of Pilot 2 as well as its support for the associated progression of specialist provision pathways in many of these schools (i.e. Key Stage 1 to Key Stage 2 or Key Stage 3 to Key Stage 4).

### **Type of specialist provision**

The Draft Framework for Specialist Provision in mainstream schools identified the regional inconsistencies in specialist provision in both mainstream primary and post-primary schools. CSSC notes that the proposed Pilot 2 provisions, while welcome, focus solely on the establishment of Learning and Social Communication classes. CSSC understands that The Draft Framework for Specialist Provision in Mainstream Schools identified that only seven of the 11 Local Government Districts have Speech and Language provisions established in primary schools and CSSC is aware that different legacy arrangements govern the type of provisions available as well as access to these provisions. While some former Education and Library Boards required a child to have a statement of special educational needs to access provision other former Education and Library Boards did not. CSSC is aware of the significant work that has been undertaken by the Languages and Communication Service in

regionalising its service and ensuring equity and would highlight that controlled schools have expressed a willingness to facilitate provisions which support the language and communication of pupils.

### **Specialist provision in mainstream pre-school settings**

CSSC notes that the Education Authority's 2018 public consultation on the draft framework for children in the early years with SEN included proposals regarding a pilot of Early Years SEN Centres in up to six mainstream early years settings across the EA. CSSC understands that many of the proposals included in this proposed framework are now being considered as part of the SEND Strategic Development Programme's work. CSSC understood through conversations with the EA Early Years Inclusion Service that the proposed adult: child ratio for specialist provision for children in the early years was 1:12, along with classroom assistant support. In addition to providing a small group environment it was intended to be a year in which parents could be supported to consider if a mainstream or a special school placement, going forward, would best meet the needs of their child. CSSC notes that the draft Special Educational Strategic Area Plan, in stating its intention to increase parity of access for all to appropriate pathways, identifies pre-school as one of the phases of education for which there is the intention to identify and address shortfalls in special school provision. Considering the emphasis on enhancing specialist provision in mainstream schools it is timely for the pilot proposed in the 2018 proposals to be implemented and consideration given again to a pilot of Early Years SEN Centres.

### **Training which is responsive to a changing pupil profile**

In responding to the previous consultations on the draft framework for specialist provision in mainstream schools and the associated Pilot 1 pre-publication consultation, CSSC commented on the need for training to be developed that is specific to the type of specialist provision facilitated by the school, the needs of its children and young people and for that training to be informed by the views of practitioners in relation to the needs of children attending. In consulting with controlled schools named in Pilot 2 CSSC was encouraged to hear positive comments about the support received in supporting the establishment of specialist provision, however, a recurring message was the rushed nature of the establishment of these provisions with many schools not notified until the end of June leaving little time to allow for the refurbishment of rooms and the appropriate training of staff ahead of school re-opening in September. Some schools referred to a process of support that while not perfect at the outset has improved over time. It is crucial that there is

learning from the experiences of these schools and that the establishment of future specialist provisions benefit from the experiences of those earlier established provisions.

### **Continued professional development of specialist provision staff**

Continued professional development of staff in the specialist provisions was another recurring theme and schools highlighted that the ability to engage with other schools with Social Communication specialist provision was 'invaluable'. Feedback in relation to the training provided for staff in the specialist provision referred to the need for it to be better 'paced' noting that the training received was intensive and that provisions need more time to plan for, implement and evaluate the provision put in place. Schools were in agreement that training should be provided on an annual basis and be responsive to the needs of the current cohort of pupils. The need for training to support children who have medical needs was also highlighted.

### **Training and staff retention**

Principals welcome the progression of pathways from P1 to P7 and the training, advice and guidance provided. They highlighted the difficulties that the temporary nature of the provision had on staffing with the need for approval of permanent status to allow for the appointment of permanent staff to reduce the need for staff to look for options elsewhere due to the insecure nature of their employment. The need for a readily available menu of training to be provided for these provisions is an important consideration as staff will for a variety of reasons move on to new posts and it is crucial that there is continuity in the children's learning experience and that the expertise which the member of staff has developed is not lost to the provision. In relation to staffing the specialist provisions CSSC was advised that the rigid employment criteria could prevent consideration of candidates extremely well placed to facilitate this type of provision. While CSSC has not had sight of the employment criteria and understands that such criteria should be rigorous to ensure the best candidate is secured, it was noted that the expectation that the successful candidate should be employed as a teacher for the last five years ignored other relevant experience such as the experience of teaching for a lesser period of time in a special school or being a classroom assistant in a special school prior to undertaking a teaching qualification.

### **Facilitating collaboration between special schools and specialist provisions**

The need to facilitate cluster working to enable specialist provisions to avail of the expertise of special schools was also clear and CSSC notes that this is a key theme of the Draft Special Educational Strategic Area Plan 2022-27 which makes the commitment to promote cooperation, collaboration and sharing between all Special Schools and Specialist Provision in Mainstream Schools across all sectors (as appropriate). CSSC fully endorses the associated actions of this key theme and strongly recommends that opportunities to share effective practice are appropriately resourced with the required substitute cover that will allow staff the time to collaborate meaningfully. CSSC would note that the advances made in using

virtual environments for collaboration could play a part in allowing for effective sharing across the region.

### **Supporting those long-established specialist provisions in mainstream schools**

While there is this clear understanding that both special schools and mainstream schools are providing for children with more complex needs training for staff needs to keep apace with this recognition. CSSC is aware of schools which having well-established specialist provision in place for a number of years, have not received, yet would welcome the support of a multi-disciplinary team to enhance their efforts to meet the increasing complexity of need presenting in their schools. CSSC is aware that some schools have found themselves in the position of being asked to accept additional pupils into their Learning Support Centres which exceed the recommended class size of 12 for a learning support provision. The level of need presenting in some mainstream schools with specialist provision has led to some settings realising that on occasions a class size of 12 pupils in a general learning support class does not allow for effective provision and the limitation of some schools' accommodation does not allow for the breakout space which would facilitate calmer classrooms. It is crucial that with an understanding of the increasing complexity of need presenting in some schools that an effort is made to support those legacy provisions with training that addresses the changing pupil profile. CSSC would also contend that staff in these long established specialist provisions could contribute to the capacity building of staff in newly established provisions and should also be included in any arrangements for cluster working. Addressing the accommodation requirements of legacy provisions is also key in going forward.

### **Responding to school's willingness to accommodate additional provision**

In engaging with the named controlled schools a number which, if they had the required accommodation, would facilitate additional specialist provision and they referred to a very real need which could be met with additional specialist provision on site. Where this is found to be the case CSSC would recommend that the school's accommodation is assessed by EA's Operations and Estates and consideration is given to enhancing the school site so that the school can respond to the need presenting in an area.

## **Supporting appropriate pathways post-16**

CSSC endorses the Fair Start report's focus on ensuring the relevance and appropriateness of Curriculum and Assessment and is aware of the concerns of many schools in relation to securing appropriate pathways for children with SEN. Through our representation on the SEND PRG group CSSC has highlighted the concerns of special schools regarding the void in the support that young people receive when they transfer to Adult Services and is conscious that one of the SEND SDP projects (the business cases for which await ministerial approval) is the Transitions Project. CSSC is encouraged that another of the key themes of the draft Special Educational Strategic Area Plan is that of increasing parity of access for all to appropriate pathways. CSSC notes that Principals of non-selective controlled schools with specialist provision have received enquiries from parents regarding the potential for their child to receive continued provision at the school post-16. This issue was raised at an Area Planning engagement session with Principals on 10 March 2022 and CSSC was encouraged by the EA's willingness to consider a possible pilot in relation to post-16 specialist provision. As an extension of this there also needs to be consideration of supporting the development of relevant and meaningful qualifications for children who attend specialist provision. CSSC is conscious that the Entitlement Framework requires schools to work to ensure economically relevant and individually engaging courses with clear progression pathways and notes the requirement that schools offer access to a minimum number of courses at KS4 and Post-16 of which at least a third must be general and one third applied. One Principal expressed frustration at having to seek annual approval for an Extended Diploma Course which has served the young people well and allowed for the relevant progression required by DE which includes further and higher education or to move into training or employment. CSSC is keen that in going forward that the leaders of mainstream schools with specialist provision are supported to develop these appropriate pathways and consultation with practitioners in relation to the qualifications which will best serve these pupils is recommended.

## **Supporting the response to challenging behaviour**

Dealing with the challenging behaviour that some children present with was also highlighted as a key area of concern for the leadership of mainstream schools with specialist provision and references to the need for appropriate training which supports staff capacity and confidence were made by a number of controlled schools. Principals of both primary and post-primary schools referenced the Team Teach model which CSSC understands is only available to the staff of special schools. The model includes de-escalation strategies that pre-empt and have the potential to negate the need for physical restraint. CSSC is conscious that the NICCY Rights based review of restraint and seclusion emphasises that 'restraint should only ever be used as a measure of very last resort... and teachers must attend rigorous training to ensure safety is paramount and that focus in on prevention, de-escalation and reflective practice.' CSSC would agree with this assertion and understands that there is a lack of guidance and support available to schools and as a result staff faced with challenging behaviour are unsure if the actions they take to prevent harm to the child

and to others will protect them from litigious action should they intervene physically in any way. CSSC would echo NICCY's calls for the Review to be considered by DE in a timely manner and for schools to receive the necessary guidance, support and training to ensure confidence and assurance that the means they use to respond to challenging behaviour are the most appropriate and effective means which protect the dignity, safety and wellbeing of both pupils and staff.

### **Supporting the emotional health and wellbeing of staff**

In our engagement it was noted that facilitating specialist provision and working to meet the needs of all children can take its toll on the emotional health and wellbeing of staff in specialist provisions and supporting staff to manage the challenges of this role is crucial. CSSC notes the recognition in the DE Children and Young People's Emotional Health and Wellbeing in Education Framework of 'our collective responsibility in supporting the emotional health and wellbeing of our children and young people and those working with them.' One of the recommendations in the Framework is that of 'fostering a culture of trust where all staff feel valued and know how to access support if needed, for example, through the use of staff debriefing/supervision.' CSSC is conscious that allowing opportunities for staff debriefing/supervision firstly requires the staff providing these opportunities to be appropriately trained. CSSC would therefore contend that EA considers how to support staff in controlled schools to be able to capably provide this type of support to staff in circumstances where they have encountered challenging behaviour. CSSC would also refer the Area Planning team to the work currently being undertaken by EA to promote Trauma Informed Practice in schools which also has an emphasis on supporting staff to deal with secondary and vicarious trauma experienced through their roles.

CSSC welcomes the extension of specialist provisions in controlled schools and is happy to discuss this response.

Yours faithfully



Mark Baker  
Chief Executive