



EOTAS MATTERS
SEND Review Consultation Response

Response to SEND Review:
Right support, right place, right time
Government consultation on the SEND and
alternative provision system in England

July 2022

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1. INTRODUCTION

About EOTAS Matters

EOTAS Matters was founded in response to the increasing number of parents who had children and young people with EHCPs, but were unable to access education in a school or college setting. Heidi gathered together a network of professionals to support parents of children with barriers to attendance who need to secure provision for their disabled children.

EOTAS Matters was founded in 2021 by Heidi Mavir, a SEN Advocate and Parent who had secured an EHCP (Education, Health and Care Plan) and EOTAS (Education Otherwise Than At School) agreement for her 16 year old son, Theo.

After success at Tribunal, Heidi set up an online community for parents in similar situations, for whom school or college was not working. Within 7 days of the community opening, EOTAS Matters had 1500 Members. As of July 2022 EOTAS Matters Online Community is made up of over 5500 families. EOTAS Matters also hosts a Community for Professionals. Working alongside other organisations in the field such as Not Fine In School and Square Peg, EOTAS Matters are committed to getting good quality information, advice and support to families of children who have barriers to attendance and may need to secure a bespoke EOTAS package in their EHCP.

Some things to know about EOTAS

- EOTAS as referred to in this document is NOT Elective Home Education - EOTAS is secured through an EHCP and provision is funded by Local Authorities. EOTAS Parents do not want to home educate their children - rather they want their children to have the SEN Provision they are legally entitled to as outlined in their EHCP, even if they cannot attend a school or college setting.
- EOTAS families often have packages of provision that include several providers - often working across health and education to include holistic multi-agency working.
- It is not uncommon for EOTAS packages to include provision from a number of small, hand-picked independent providers to include 121 tutors and mentors; forest school, farm and animal-based sessions; and child-led, interest-based learning. This is often delivered alongside mental health support (including CAMHS); as well as Physiotherapy, Occupational Therapy and Speech and Language Therapy.
- Many EOTAS children access some or all of their provision online.

2. Case Study - Theo

Theo is Heidi (the founder of EOTAS Matters)' son. Theo's needs are a good example of the type of those presented by many of the children in EOTAS Matter's Families. Heidi like many parents of children with SEND - had to work hard to secure provision for Theo, who is Autistic/ADHD with significant sensory differences. He can experience extreme anxiety in public spaces and has school-based trauma due to his needs not being identified sooner. When Theo was in school, in spite of Heidi raising concerns, she was told he was "fine in school."

After Theo suffered a mental health crisis aged 14 and was too unwell to attend his Mainstream Academy School, his Mum, Heidi, struggled to secure an EHCP or suitable provision for him to continue his education in his GCSE year. After a failed managed move, and over 12 months of no education and not being able to attend school, Theo was finally offered a place in a Medical Needs Pupil Referral Unit (PRU) where he secured 5 GCSEs.

However, when his PRU placement ended and it came to securing a Post 16 setting, there was none suitable for Theo, who was academically able but whose complex needs meant he needed to learn in a small, quiet setting. Heidi (like many parents and carers in similar circumstances) took her LA (who had named a large mainstream college in this EHCP, against professional advice) to Tribunal to secure a bespoke package of education for Theo. Theo's sensory differences, school-based trauma and extreme anxiety meant that he could not attend a school or college setting.

Under Section 61 of the Children and Families Act, Tribunal ruled that it was inappropriate for Theo to be educated in a School or College, and a bespoke package of education for 12 months was agreed. This is commonly known in the SEN Advocacy space as EOTAS (Education Otherwise Than At School) or EOTISC (Education Otherwise Than In School or College). Section I (Setting) of Theo's EHCP was left blank and a bespoke package of education, funded by Personal Budget was put in place for Theo for 12 months. The package included Academic Tutoring, Mental Health Support, Occupational and Speech and Language Therapy and 121 Mentoring. The cost of Theo's 12 month EOTAS package was less than £25,000.

After a period of 12 months on EOTAS, Theo is ready to return to Mainstream Education. This year he has achieved 2 more qualifications and - more importantly for Theo and his family - he is no longer in a Mental Health Crisis. Theo has a place to study Level 3 Animal Care in a Mainstream College, with support for him to do so detailed in his EHCP.

Theo says: ***"I really WANTED to be in school but I just couldn't be. Just getting into my uniform would bring on a panic attack. School was too noisy. And so busy. So many people expecting so much of me. I felt really alone even though I was surrounded by people. My ADHD meant that I found it difficult to focus and to organise myself and being Autistic meant I sometimes struggled to understand and be understood.***

*It got really bad. I didn't leave my house for about 7 months, apart from short trips in the car with my Mum. I was really scared. I was worried I would never get better. I really wanted to get a good set of GCSEs but **because I couldn't go to school my education just stopped!** It took months to get me any support.*



***This year of EOTAS I feel has saved my life... And my education.** I needed this time to recover and get back on track. I also wanted to learn about what being Autistic and ADHD meant for me so that I know how to ask for help when I need it. I wish it was easier for kids like me to get the help they need.*

*I am so excited to start college. I know I am lucky to have had EOTAS but it shouldn't be about luck - **this should be an easier option and process for families who need something that isn't learning in a school or college.**"*

Theo Waddington 2022 (pictured with his dog, Bertie).

3. EOTAS Matters' Research

Over the last 12 months EOTAS Matters have been gathering data and capturing the views of parents, carers, children and young people to help inform our work. We have held a number of Focus Groups, including some on the SEN Green Paper. In July 2022 we gathered data through the EOTAS MATTERS ALTERNATIVE PROVISION SURVEY, specifically around EOTAS Families' experience of Alternative Provision.

We have also collected hundreds of stories and case studies from families who have been through or are going through the process of trying to secure EOTAS for their disabled children. We have used this research to inform our response to the SEN Green Paper Consultation.

EOTAS Matters' Alternative Provision Survey 2022

In July 2022, we released a survey to capture data and views from families whose children have barriers to attendance. Below is a summary of the demographics of those who responded.

(i) Demographics

266 - responses

101 - number of local authorities represented by families responding to the survey

3 years old - age of the youngest child whose parents responded to the survey

20 years old - age of the eldest young person whose parents responded to the survey

Gender mix of children and young people whose parents responded to the survey

Female - 37%

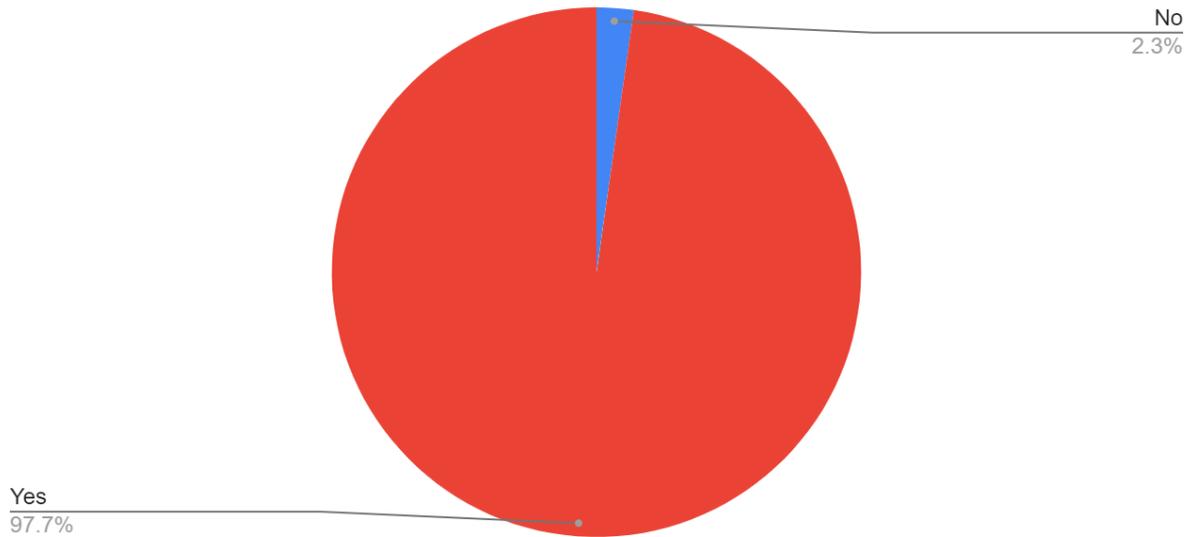
Male - 56%

Trans/ NonBinary/ Gender Fluid/ Other Gender - 7%

(ii) Data

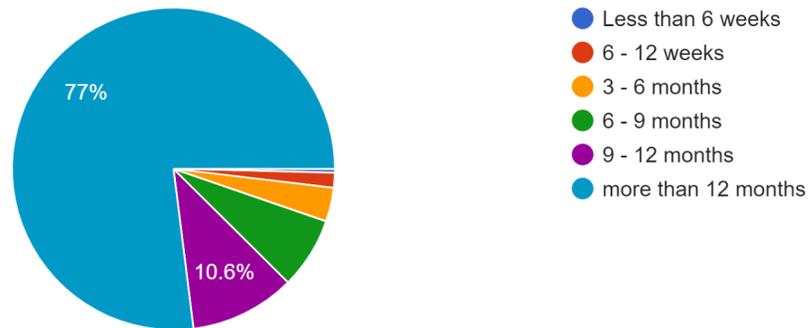
Over 97% of those responding reported that their children had experienced barriers to attendance which has impacted their attendance at a school within the last 12 months

1. Has your child experienced barriers to attendance which has impacted their attendance at a school within the last 12 months?



77% of families reported that their children had been experiencing barriers to attendance for more than 12 months

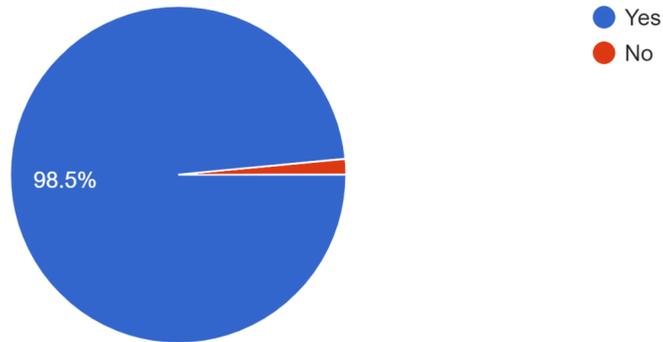
2. How long has your child been experiencing barriers to attendance?
265 responses



Over 98% of those surveyed told us that their children had SEND:

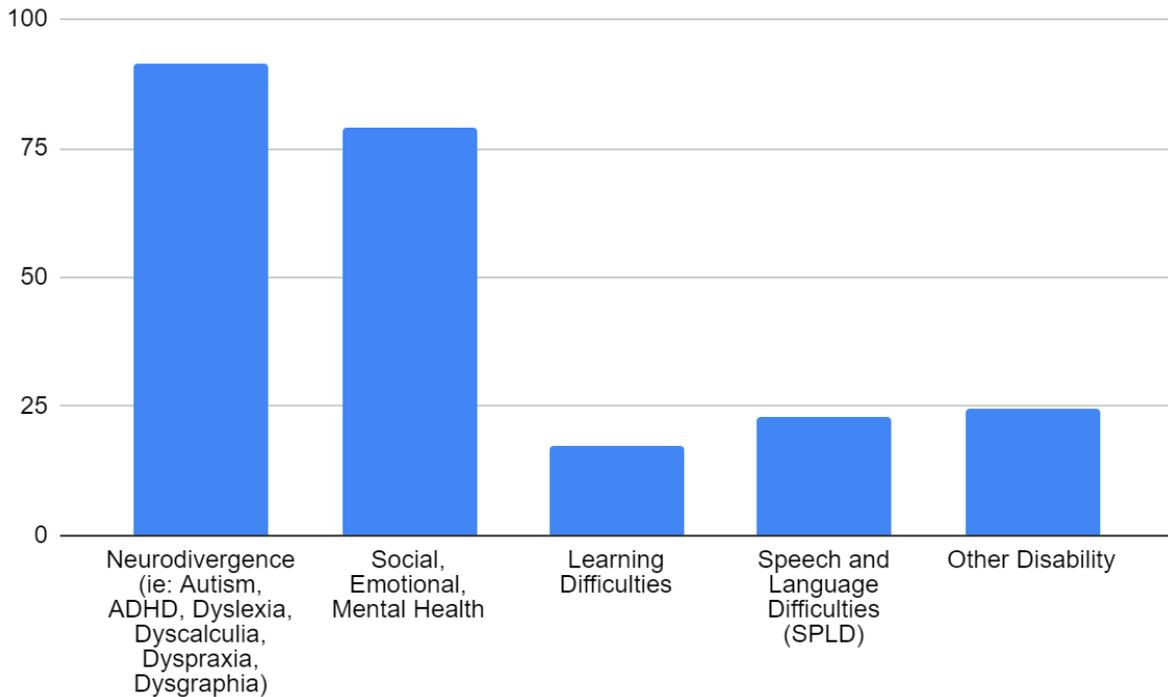
3. Does your child have Special Educational Needs and/or a Disability?

266 responses



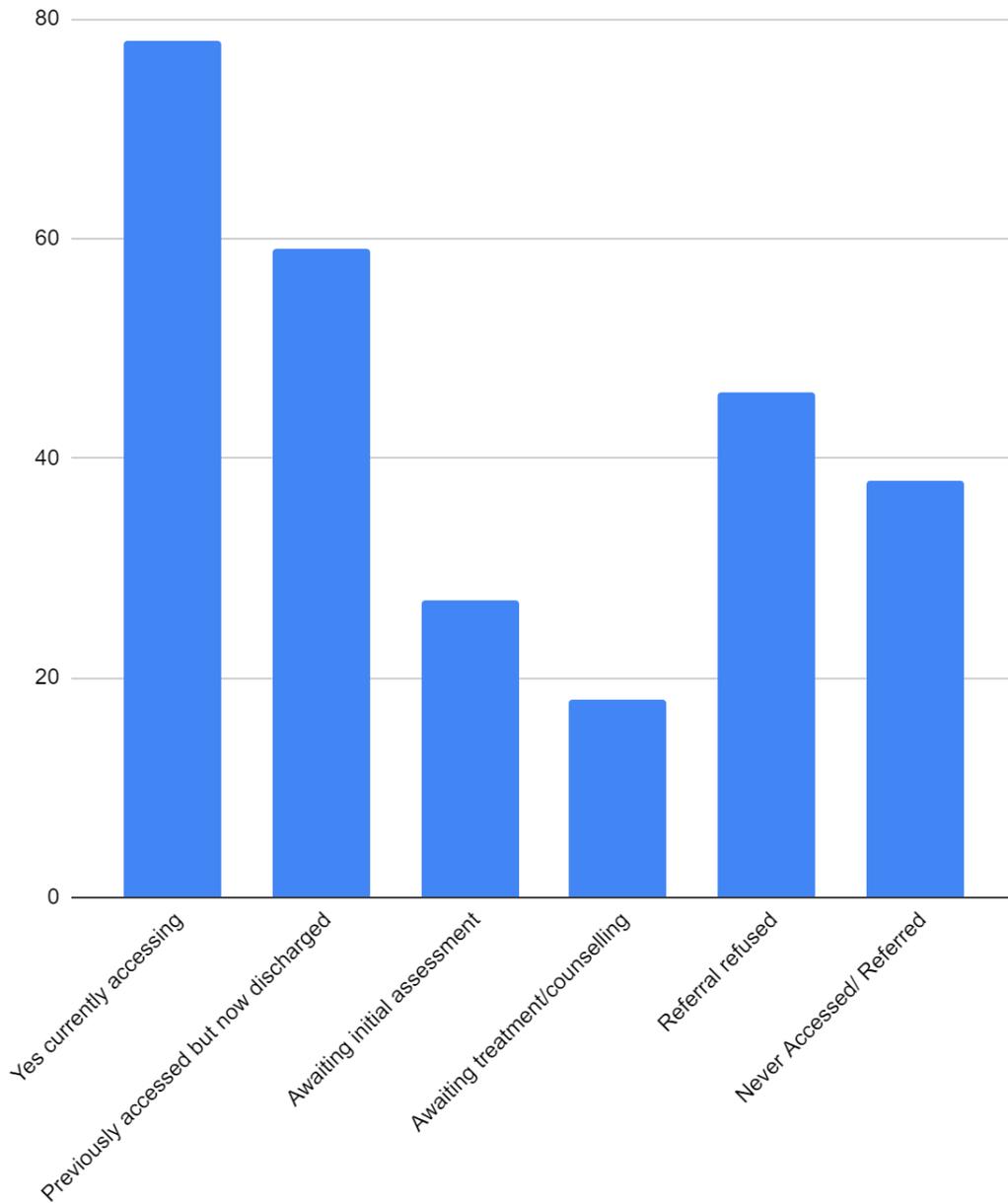
The majority of Survey Respondents had children who were Neurodivergent and/ or who had Social, Emotional and Mental Health needs:

4. If yes, how would your child's SEN needs be classified? (tick all that apply)



We asked respondents to tell us whether their child had ever accessed CAMHS

- Only 14% had never accessed or tried to access CAMHS
- 17% of respondents had had a CAMHS referral refused
- 22% were currently waiting for an initial assessment or were on the waiting list for treatment



(iii) Summary of Parental Feedback

We wanted to preface our Consultation response by sharing our research findings and response to the Consultation with the words of some of our families. We would ask that - in the midst of discussions about SEND Reform, changes to Alternative Provision, Academisation and the setting of National Standards, Decision Makers take time to consider that for some children, being in school is not an option. Those children are some of the most vulnerable in the system. They need more than short-term interventions in Alternative Provision. Choosing from a “list” of schools will not work for children for whom school is an impossibility. Many need intensive support that can only be accessed through an EOTAS Package, secured through their EHCP. We have considerable evidence that when EOTAS is out in place for these children, they can complete their education and successfully progress to adulthood. We also know that when these families go without support or provision, the impact of that is disastrous, resulting in significant harm to families, further cost to the public purse as those children enter adulthood and - in some of the most tragic cases - loss of life.

We implore the Government to take steps to ensure that decisions made around the reform for our SEND System, does not further disadvantage EOTAS families.

We asked Parents in our Survey to share with us their experiences. Some of the responses were pretty bleak and made for depressing reading. They paint a picture of families in crisis; children in the grip of mental ill health; students left without provision for months; sometimes years; a culture of parent blame and missed opportunities for early interventions because parental voice is ignored. We hope that those reading this report will pay attention to the words of parents who have shared their own lived experiences, which we have quoted throughout and are genuinely just the tip of the iceberg.

We have over 5500 families in our Online Community (which we only opened 12 months ago) and over 250 families responded to our Online Survey. Almost all of those families have children who have barriers to attendance. Many of them have neurodivergent children who are deeply traumatised by their experiences in school. The majority of them are battling with their LA to secure suitable provision for their children with SEND. None of them have chosen this.

“This process has not only caused trauma to our child but to the rest of the family for 2 years please listen to parents who know their children and unnecessary trauma could be avoided.”

(Parent Comment in EOTAS Matters’ Online Community)

“The system is utterly broken. I have lost my job as a headteacher as a result of no provision. I have had to sell my house. Our whole life is in turmoil. We have had no support

for 18 months and my son's mental health and my own (and his sibling) is all declining because the system is set up to stop us accessing services as it costs money. The LA cannot find a school to take my son yet they deny me a personal budget or EOTAS. We have been left with nothing.” (Survey Respondent July 2022)

*“Our younger child has is recovering from a traumatic experience at an unsuitable maintained special school and has **thrived with very low demand, flexible, self-directed, mainly outdoor, experiential learning.** They would like to attend 'a school that is not like a school' in future - there's nowhere suitable for their profile and age group within reasonable traveling distance.” (Survey Respondent July 2022)*

*“Year 6 she spent in a hallway as couldn't cope in class, year 7 she has not passed reception office, since Jan has not even left the car. Schools' attitude has been disgusting throughout, constantly ignored by local authority and them doing u turn after agreeing she needed a sen school to u turn and say **not enough evidence from school so has to stay at the mainstream school while no provision is made at all** and will be another long battle from set to get any education for her.” (Survey Respondent July 2022)*

*“**School just isn't suitable, no matter how good the school is.** My child's anxiety and phobia is so severe that any association with school is traumatic. My child can't access any formal learning at all although she is academically very capable but has such a severe anxiety response to any type of adult led learning” (Survey Respondent July 2022)*

*“**My child couldn't function in school. We failed at 3. We are now on an EOTAS package built around my child. It is flexible and provides for ALL needs which means they can access education and has been able to sit GCSES at home”**
(Survey Respondent July 2022)*

*“Having a child unable to attend school has been devastating for the family. One parent has had to completely stop work. Child has been left with no support for months on end , and several times has had good support removed. **It is the most stressful life experience we have experienced by far.**” (Survey Respondent July 2022)*

*“**My son says that school made him want to kill himself, now he's not attending he no longer feels this way.** He self harmed every school day for the last 4 months he attended. For these reasons he would refuse to ever attend school again.” (Survey Respondent July 2022)*

*My daughters words...“I'm scared of school, I don't trust them anymore, they've let me down. They wouldn't listen to my mum when I wasn't able to tell the school how hard things were. They don't believe her. **How can I get the support I need if they won't believe my mummy is my voice?**” (Survey Respondent July 2022)*

“School was terrifying. They would hold me and not let me leave. I was a prisoner, but without doing anything wrong. I had to do things even though I was scared. Nobody cared. I can’t even do the things I used to... Like maths, English, my brain stopped, it ruined everything”

(Young Person Survey Response July 2022)

4. SEND Green Paper Consultation Response - EOTAS Matters

EOTAS Matters has selected questions from the Consultation that are most pertinent to our families. Responses are accompanied with quotes taken directly from parents and children from our Online Community and recent Survey.

1. Local Inclusion Plan Proposals

Consultation Question 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?

EOTAS Matters' says:

In order for parents and local authorities to most effectively work together to produce a tailored list of placements that is appropriate for their child, and give parents confidence in the EHCP process:

- There must be some flexibility so that decisions can be made in the best interests of children who have a complex presentation of need in order to ensure that those who cannot be in mainstream are not placed in unsuitable specialist settings, simply because that's all that's available "on the list"
- There must be clear guidelines around securing provision for children for whom no setting has been identified, to reduce the time students are without provision. This should include guidance around making provision for children who need Education Otherwise Than At School, incorporating recent Case Law, to ensure that LA decision makers understand how to apply Section 61 of the Children and Families Act to ensure that suitable provision is made for children for whom school is "inappropriate". This is particularly important for families who need a bespoke package of education for an extended period, secured with an EOTAS arrangement in their EHCP, without the pressure of a reintegration to a setting before children are ready.
- Local Authorities need to be reminded of their Section 19 duties to provide a "suitable" education according to the child's aptitude and abilities in order that lists of placements genuinely are tailored to the needs of the child.
- There must be a robust system that ensures that when a child is unable to attend school, Alternative Provision is put in place swiftly to avoid parents needing to self-fund or - worse - children being left without any provision, in order to prevent the erosion of trust in the system and children falling behind their peers..
- It is essential that LAs are still able to use small, independent Alternative Provisions who can take the holistic, trauma-informed, child-led approach needed for neurodivergent children with barriers to attendance, emotional-based school avoidance, school-based trauma, sensory differences and SEMH needs.

Detail

Proposals to develop a local inclusion plan set out the provision that is available within the local area, including units within mainstream. This will mean that families are provided with a “list” of approved providers from which to make their preference known.

In relation to:

“24. In instances where it has been identified that a child or young person’s needs require a placement in specialist provision, the local inclusion plan will set out the provision that is available within the local area, including units within mainstream, alternative and specialist provision.

25. In order to support parents and carers to express an informed preference of a suitable placement, they will be provided with a tailored list of settings based on the local inclusion plan, including mainstream, specialist and independent, that are appropriate to meet the child or young person’s needs. These settings may be outside of the boundary of the local authority where this is appropriate. The local authority will allocate the first available place in order of the parent’s or carer’s preference and this school will be named in the child’s EHCP.”

EOTAS Matters says:

Our families have raised the following questions and concerns regarding the proposals around a tailored list of placements:

- Given the lack of specialist settings available, what is the plan when schools do not have capacity? Will they still be on the list? If so, what happens if a parent selects that setting?
- Even if a School is ordered to accept a child, how long will families have to wait for space to be made for them? Whilst we know that legally a setting cannot say that they are “too full” to take a student, in reality this is what happens, under the guise of stating that they can’t meet need. We have numerous parents in our Online Community whose children have been without provision for extended periods of time (sometimes years!) in spite of being recognised as needing Specialist Provision and that being detailed in their EHCP.

Some comments from members of our online community support these concerns with evidence through lived experience:

“all specialist settings said ‘NO’ for my son, due to his needs”
(Parent to 15 year old student, Leicestershire, July 2022)

“We have had no placement since summer 2017. EHCP finalised autumn 2017. My son was 14 at that stage. Very academic. No education at all. Missed both GCSE and A Levels”
(EOTAS Matters Online Community Parent July 2022)

“We had every specialist setting locally consulted, including those in the neighbouring county. In excess of 10 specialist settings all responded ‘Can’t meet need’..”
(Parent to 14 year old daughter (Year 10), Somerset, July 2022)

EOTAS Matters says:

- Whilst we welcome any measures that can reduce the length of time children have to wait for a place in a suitable specialist setting we are unsure how providing a “list” of schools to choose from will do that more effectively than the current system.
- We are concerned especially that the roll out of new free schools could mean that, in some instances, where specialist provisions are over-subscribed, places might only be available in “new”, untested provisions with no track record or Ofsted record.
- We are also worried that families may be faced with choosing from a list of settings without the opportunity to even visit the provision or meet staff before being put on roll.
- We know from our Survey and Focus Groups that many families, when they have been unable to secure a place in a specialist provision, have found that unregistered, small independent providers have been a good fit for their children in the absence of a suitable provision being identified for them.
- Given the current difficulty families have in accessing AP, we have further concern that the “approved list” may present another barrier to accessing AP whilst waiting for a placement or if a named placement proves to be unsuitable. We expand further on this under our response to Alternative Provision below.
- We need a simplified process whereby families can access provision that is not a school when this is needed - we know from our Online Community that it is rare for EOTAS is secured without families having to go to Tribunal.

“With complex Pathological Demand Avoidance (a profile of Autism), other kids can often be a huge trigger. So one to one specialist provision that can be flexible and meet the child where they are, is absolutely essential. Pushing kids into schools for which they are not suited, won’t work for anyone, and ham-stringing AP so it can’t be flexible will render it useless.”

(Survey Respondent July 2022)

2. Mandatory Mediation

Consultation Question 6. To what extent do you agree or disagree with our overall approach to strengthen redress, including through national standards and mandatory mediation?

EOTAS Matters' says:

- Whilst we agree with the commitment to strengthen redress we **STRONGLY DISAgREE THAT MANDATORY MEDIATION IS THE WAY TO DO THIS**
- We agree that there are some examples of effective Mediation in some LA areas. However - for the most part - families have little confidence in the Mediation process as a means to resolve issues for children with complex needs, especially in the case of EHCP content appeals. Imposing mandatory mediation is not the solution to this lack of confidence.
- We believe that families should be empowered to engage in the Appeals process in a way best suited to them and that imposing Mandatory Mediation for all disputes strips them of what little bit of autonomy they have.
- We welcome improvements to the Mediation process and believe that if there were: clearer guidelines and stronger penalties for LAs not meeting their statutory requirements, with penalties for LAs who did not run an effective Mediation Service, this would improve the quality and outcomes from Mediation. The resulting restoration of trust in the process would mean that more families will choose to engage with Mediation voluntarily.
- If Statutory Mediation is to be imposed in all cases, the following steps will need to be taken to protect and support families in the process:
 - Investment in and expansion of free services to support families at Mediation
 - An upskilling of Mediators - ideally training them in SEN Law
 - Training for Mediators and professionals representing LAs at Mediation in Trauma-informed practice
 - A clear path for families to follow to secure suitable provision for children unable to attend school whilst they are going through the Mediation process

Detail

Proposals to streamline the redress process to make it easier to resolve disputes earlier, include making mediation mandatory, whilst retaining the tribunal for the most challenging cases.

In relation to:

“31. Mediation helps to maintain and improve relationships between providers, local authorities and families which is important for long-term collaborative working and supports better outcomes for children and young people. In the current system, families must secure a mediation certificate before registering an appeal with the tribunal, but they do not have to go through mediation itself. We propose to change this so that families and local authorities must engage in mediation prior to registering an appeal to the tribunal. The national standards will set clear expectations of how different parties should engage in mediation, including timescales for mediation to take place and ensure that local authority decision-makers attend meetings. We will make sure there is appropriate support available to parents to help them understand the mediation process and how best to engage with it.

32. We propose to keep the impact of mandatory mediation under review as we start to deliver these changes. If the national standards and mandatory mediation does not prove effective in strengthening earlier redress, we will consider whether it is necessary to introduce an additional redress measure in the form of an independent review mechanism. This could be the same multi-agency panel proposed in paragraph 13 that reviews evidence at the EHC needs assessment stage to ensure consistency. In these circumstances, the panel would be responsible for reviewing the evidence in any dispute cases that are eligible for tribunal appeal, including refusal to assess need, refusal to offer an EHCP and the content of a plan. Cases would need to go through mediation first and then be reviewed by the independent local panel prior to a tribunal appeal being registered. We would need to consider whether this panel could make the binding legal judgements required to overturn previous local authority decisions and how this would apply across education, health and care.”

EOTAS Matters says:

Our families have raised the following questions and concerns regarding the proposals around a Mandatory Mediation:

- What measures will be in place to ensure that whilst families are engaging in Mediation (and possibly the independent local panel review process also) have suitable provision whilst undergoing this process?
- What steps are being taken to reduce the time it takes to get to Tribunal? We note that currently Appeals lodged with SENDIST for a B, F and I Appeal are being scheduled for Hearing approximately six months after the date the appeal was lodged. Our families are concerned that adding another 2 steps into the process will extend the wait for suitable provision further, causing significant harm to their disabled children.
- What measures will be in place to ensure mediators are adequately skilled to ensure mediation is effective? Our families tell us that some LAs use Mediation as a means to delay the process and that, whilst for Refusal to Assess and Refusal to Issue cases the

process can be effective, in the case of Content Appeals, Mediation does little to resolve issues.

- Families tell us that they find the EHCP process difficult and adversarial. Many parents report that by the time they are at the stage of deciding to Appeal, relationships with the LA are significantly damaged and that the idea of Mediation when they will be required to go over old ground with little chance of resolution is traumatic for them.

Snapshots of comments from our Online Community Forum, illustrate how different Mediation experiences can be. All our families who responded do not feel that Mediation should not be mandatory:

“We’ve used mediation twice for content appeals... We have a very good mediation service in my LA and I’d happily use them again. Each mediation was productive and useful and got us closer to an agreement. After the first we still proceeded to Tribunal, albeit with fewer outstanding issues. At the second we achieved a binding schedule for negotiation with an LA deadline that would still allow us to go to SENDIST if we wanted. In the event the changes were good enough and we accepted the new Final.

However, the first time our LA tried to avoid mediation with us by allowing the clock to run down on our mediation request. It took some heavy duty emailing to get them to play ball and meet with us. Despite the concept that mediation is mandatory for LAs, if they don’t respond within the time limit the mediation service will simply issue the certificate and you’ve just wasted a month We had a SENDIASS advocate at our first mediation, an experienced PDA/EOTAS advocate at our second. I would use an advocate again definitely.”

(Parent Comment in EOTAS Matters’ Online Community)

“Mediation got the right to assess though didn’t specify anything other than Educational Psychologist and didn’t make timeframe adhered to”

(Parent Comment in EOTAS Matters’ Online Community)

“We had mediation over the content of EHCP, prior to EOTAS. It was totally pointless. I tried it, as it made sense to me to try and resolve things without tribunal if possible. It quickly became clear the LA had no intention of considering anything I was suggesting.”

(Parent Comment in EOTAS Matters’ Online Community)

“I found mediation helpful. Cathartic because I could say all what was on my chest for 15 mins in front of school and LA. School began to take me seriously which never happened before, they were fobbing me off previously, but as a result of me calling mediation they actually fired Sendco which shocked me. LA very quiet at the meeting and sitting on the fence. However I now have a mediation certificate and will take them to tribunal within 30 days, and it feels as if attending mediation has bolstered my case.”

(Parent Comment in EOTAS Matters’ Online Community)

“Lack of knowledge of the mediators means that they cannot stop parents being misled and ensure fair play. Also no easy come back if what is agreed in mediation isn’t followed through on.” (Comment in EOTAS Matters’ Online Community)

“Was a complete waste of time. Caseworker used it as an opportunity to have a go at me. She was very hostile. Mediator did nothing at all.”

(Parent Comment in EOTAS Matters’ Online Community)

EOTAS Matters says:

- We do not consider imposing Mandatory Mediation for parents to be a trauma-informed approach. For many families, the EHCP process is especially stressful and by the time the EHC plan is issued, trust has been eroded between families and LAs.
- Many of our families report that being in mediation adds to stress levels and that in a bid to conserve their energy, they prefer to escalate straight to Tribunal.
- We believe that the high number of Appeals will not be reduced by imposing Mandatory Mediation. Rather, there is a need to have more in place to ensure LAs fulfill their statutory duties and complete EHCPs fairly and effectively. LAs not adhering to existing guidance and laws is illustrated by the extremely high percentage of Tribunal rulings in families’ favour.
- Many families tell us that with unwell children at home they need a clearer, quicker, fairer and trauma-informed approach to ensure swift resolution for their children and that they do not consider Mediation is fit for this purpose.
- We believe that asking families to engage in two extra steps before lodging an Appeal will lengthen the process, ignoring the key issue which is that for every day’s delay, the impact on families with children unable to access education becomes more and more intolerable.
- We feel also that the needs of Neurodivergent parents of Neurodivergent children are not considered in these proposals. These proposals will add at least one more “admin” step in the process - something many Neurodivergent adults find challenging. We know that many of our families use advocacy and/ or legal services to support them through the Appeals process, sometimes at considerable financial cost : adding more steps to the process will drive the costs up for many families.

“I know that we're in a minority of good experiences with mediation and I strongly believe that the choice to mediate or not should remain with the parents/carers and also remain mandatory for LAs.”

(Parent Comment in EOTAS Matters’ Online Community)

3. Reforms to Alternative Provision

Consultation Question 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?

EOTAS Matters' says:

- **WE DISAGREE THAT THIS NEW VISION FOR ALTERNATIVE PROVISION WILL RESULT IN IMPROVED OUTCOMES FOR CHILDREN AND YOUNG PEOPLE**
- We have grave concerns that by requiring all APs to become parts of MATS, families will be unable to secure provision for EOTAS with smaller providers, who offer trauma-informed, neurodivergent-affirming support for children who need a holistic, low-demand approach.
- We expect to be able to evidence when we consult on the call for evidence that many of these small, independent providers are neurodivergent-owned and run businesses, who not only support neurodivergent children, but also employ neurodivergent adults. We are concerned that a requirement for Ofsted registration for all APs could present challenges for the disabled adults running these services. Essentially, this policy could put disabled-owned businesses at a disadvantage and at risk of closure.
- We feel (and our families feel) that the definition of AP in the Consultation is not broad enough and that there has not been sufficient consideration of the significant contribution to the sector by independent providers.
- We are concerned that - for children who need EOTAS arrangements on a longer-term basis, there will be no route to such provision and that the administrative process for accessing anything more than time-limited AP may be a barrier to children accessing support in a timely manner.
- We agree that early identification of need and targeted intervention is needed. However, our families tell us that - too often - approaches to supporting neurodivergent children and those with SEMH challenges are often not rooted in a solid understanding of the intersections between neurodivergence and mental health and that - as a result - interventions (such as graded exposure or part time time tables) add to the distress of children and young people.
- We would like to see a way to unlock better access to mental health services for Children and Young People with barriers to attendance due to mental health. Without that, we fear that more children will face extended periods unable to access education and without specialist mental health support.

Detail

We intend to contribute to the call to evidence on the use of unregistered provision, as many of our families rely on small unregistered APs to meet the needs of their children unable to attend school. We have tried to capture the mood of parents in this section which is a sense of fear that the use of independent Alternative Provision may be blocked by these reforms, leaving many

children who have barriers to attendance and significant and complex needs, without suitable provision or support.

Our families have raised the following questions and have significant concerns regarding the proposals around reforms to Alternative Provision, since many of them rely on small, independent APs to meet the needs of their children that could not be possible in a school setting:

- What do the Government intend to put in place for Children and Young People who need provision that does not “look” like a school or for whom transition back into a setting is not appropriate?
- Whilst the Consultation states that there will “also be longer-term, transitional placements in alternative provision”, these will only be “when that is in the best interests of the child or young person”. Who will decide what is in the best interests of the child? How will that be tested? Will this be another hoop parents will have to jump through to secure provision? What will be done to ensure that this route is accessible for children who use it, without “thresholds” and demands for medical evidence that we know block and delay access to AP under the current system?
- What plans will be made to ensure that small, independent APs can continue to operate and provide the life-saving services they do to children who need low demand, trauma-informed, interest-led provision, sometimes for extended periods?
- What will happen to children for whom a “time-limited” response is not appropriate?
- Does the Government intend to “block” access to provisions who chose not to join Multi Academy Trusts for children who have been identified as needing EOTAS under Section 61 of the Children and Families Act? If so, what will they do to ensure that the process of Registering with Ofsted and joining a MAT is streamlined, appealing and accessible to small providers?
- Where will “reasonable adjustments” sit in plans for a uniform service across all Alternative Provisions?
- What measures will be put in place to ensure that there is still sufficient flexibility in the AP system to allow for children who need longer placements?
- Given that the intention is to enable early interventions for children who need it, what training will be statutory for those working to support children to “receive quality support, such as coaching and self-regulation skills, as soon as they need it from skilled practitioners they can trust?” **Will the Government commit to statutory training for all practitioners to ensure they take a neurodivergence-affirming, trauma-informed approach to ensure that these interventions are appropriate for neurodivergent students with mental health challenges?**
- We have concerns that there was a lack of representation on Alternative Provision Stakeholder Group who fed into the proposals in the Green Paper. Six of those sitting on the Group were employed by Trusts. We cannot find any evidence that any Independent Providers were invited to sit on the Steering Group. Given that, how can we be assured that the Steering Group has a good understanding of the role independent APs have to play in supporting children and young people?

In relation to statistics quoted in the Green Paper, namely:

4. The number of children and young people in alternative provision is “small”

Upon closer inspection. In this instance “small” means 54,000 children (Schools, pupils and their characteristics, Department for Education, 2021). Families with children who need EOTAS tell us that as a group they feel invisible: that because numbers are “small”, the needs of their children are often overlooked. Regardless of the numbers, for those families whose children need EOTAS and AP, the challenges are significant and we welcome moves to reform the system.

EOTAS Matters is keen to ensure that the voices of these families are not lost in the middle of plans for Academisation, standardisation and redistribution of funds. In our online community and through our survey, children, young people, parents and caregivers all told us that they often felt like their voices weren’t heard:

“My daughter would like to contribute that she feels she has not been listened to and that delays in getting the right support have left her unable to trust people in authority. She wants to learn but is terrified of the school environment and wants to feel safe. She has an eating disorder and wants to always be able to eat at home.”

(Parent Comment in EOTAS Matters’ Online Community)

In our Alternative Provision Survey we sought to gather the views and document the experiences of families of Children and Young People with Barriers to Attendance.

- 259 families responded in the first 48 hours
- 66% of respondents had accessed Alternative Provision
- 60% of those who had accessed AP, had accessed Independent Alternative Provision
- The breakdown of the type of AP being accessed by our families included Independent Providers who were not Ofsted. The most-commonly accessed APs in our Survey Respondents were:
 - Animal-based provision (ie equine or animal therapy) - 39%
 - Independent/ Private Academic Tutoring - 36%
 - Online/ Virtual Provision - 33%
 - Computer games-based provision - 30%
 - Forrest School or Similar - 27%

Many parents stated that accessing AP had been useful to them:

“It has been really important for I to access AP as this has provided social experiences, and access to resources that I am unable to replicate at home. In addition, this is some of her only

time where she is not with me, which is a vital part of (re)building her confidence and trauma following years of unmet needs in school.”

(Survey Respondent July 2022)

“My son told the Educational Psychologist that his AP has ‘changed his life’. He was 6 when he said this.”

(Survey Respondent July 2022)

For many of our families, having access to small, independent child-led, flexible APs, that are NOT a school setting, and NOT Ofsted registered has been particularly important.

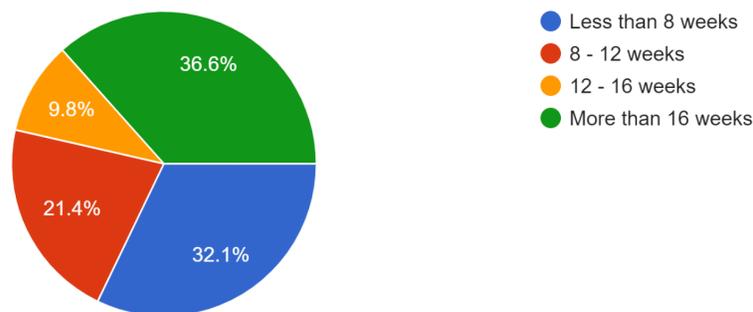
Whilst their children have been unable to access mainstream and/or no specialist has been suitable, and where regular AP has failed or been inaccessible, families told us that they often seek out their own providers as there was nothing suitable made available to them.

- 48% of respondents had requested to have AP arranged but had that request refused
- Only 22% had accessed Local Authority-run AP
- Only 38% of those families accessing AP were having the place funded through their school setting

Almost 40% of those surveyed told us that when they requested AP, it took more than 16 weeks for provision to be made.

10. If you answered yes, how long did it take to secure this provision from the initial date it was agreed?

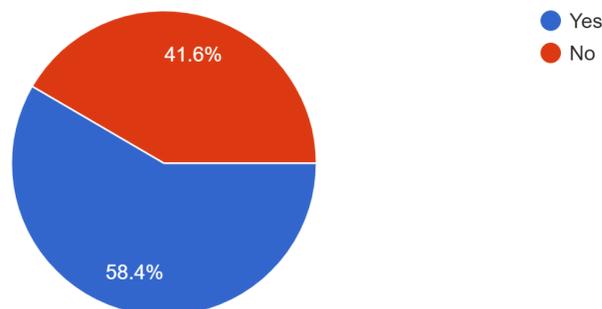
112 responses



It is worth noting though that access to these provisions often came at considerable financial cost to families themselves: 58% of respondents (141 individuals) had self-funded AP whilst their child was out of school.

11. Have you self-funded any alternative provision for your child during this period?

262 responses



Our research showed us that families who were self funding AP were spending between £10 and £4000 a month. Almost a third of families were spending over £200 a month. With a quarter spending £350 or more. Almost 10% were spending at least £700 a month. The average spend on self-funded AP was £320.50.

“I spent £1300 over 4 months just to make sure my son had something. He had 121 online mentoring with an incredible tutor who was very kind and patient. It was exactly what he needed and was worth every penny but as a single parent on Universal Credit I certainly couldn’t afford it. The LA initially said they would reimburse me. They haven’t.”

(EOTAS Matters Parent)

Whilst the narrative from decision-makers seems to be that “unregistered” providers are of a lower quality, we were flooded with responses and testimonials from parents for whom independent APs have been a godsend. A small sample of these include:

“AP at a specialist 1:1 tutor centre was recommended. It wasn’t Ofsted registered, but owners and tutors were all experienced teachers who specialised in teaching Neurodivergent students , had all the checks registered with LA as AP but wanted to teach, opposed to tick boxes... They worked gradually, starting online 1/2 hours a week with me in the room. This built up to me leaving the room. We then moved things to the tutor centre with me going everyday being near, then in the next room and eventually they went independently... My child instantly responded to the structure and routine at AP and has only missed 1 day . They went from being assessed as entry level 2 in english & maths ... to gcse level 4 , confidence is returning and now advocating for themselves. Started to attend a manga drawing group and starting to connect with other

*people their age on Spectrum Gaming. **Independent AP has been a lifeline, there is no other available provision that would meet my child's needs.***

(Survey Respondent July 2022)

“The AP funded by school is child led, interest led and 121. It is an animal-based provision but is flexible enough to follow most interests. The centre is rarely busy. The adults appear trauma-informed and some are neurodivergent. They have a good understanding of the barriers affecting the young people that attend the setting. My daughter is making exceptional progress at her own pace. She feels safe and is beginning to 'be herself' more and more after years of excellent masking at school. The owner of the setting wants to remain independent. They are registered with the LA as a provider of AP but the owner has said that they would not want to be registered as a school as the learners need them not to be 'a school'. This is not a provision I would have been able to self fund, if for example I had decided to deregister from school while awaiting EHCP as it is expensive due to being so bespoke and offering such excellent experiences for learners. This provision is what our proposed EOTAS package is built around.”

(Survey respondent July 2022)

“These small AP's are really precious as I was able to get education quickly and the process was straightforward while waiting for the LA to get their act together to fund and find EOTAS.”

(Survey respondent July 2022)

“These alternative provisions have been amazing for her, as she isn't really able to learn at school due to her sensory overwhelm and her severe anxiety. At school she is often just ignored unless she is doing something that either her teachers or peers don't like, she tells us that she feels invisible, but at the alternative provision she often gets one to one help and gets encouragement and feels 'seen!' and this means so much to her and us.”

(Survey respondent July 2022)

“My daughter started going to a child led forest school in February. She has thrived and made friends there. I have requested AP to cover forest school costs but have been told they offer enough already (the 30 minutes of tutoring a week along with the 2 hour farm trip- my daughter accesses neither.”

(Survey respondent July 2022)

“My son attends a forest school run by a private organisation with expertise in children with SEN and with social and emotional needs. He has one to one sessions with a qualified teacher. This provision has been wonderful for him. He attends without anxiety and has been able to attend for the past few weeks even when school attendance stopped completely. He is able to take part in adult led activities, go to the toilet, eat and drink. These are all things he is unable to do at school. What he needs is more of this.”

(Survey respondent July 2022)

“Equine therapy literally life saving. Literally. Especially after additional trauma diagnosis following mistreatment bordering on abuse from specialist autism school (on top of trauma diagnosis from mainstream secondary experience). Been battling this since 2017. All I want is for my child to receive a suitable education. It’s their right.”

(Survey respondent July 2022)

We heard time and time again from parents that - whilst LAs use of APs seem to be focussed on swift reintegration back into a school setting - for many parents this was not their personal priority. Parents expressed concerns that their children experiencing Emotional Based School Avoidance (EBSA), and Mental Health challenges, were rushed through LA funded APS and back into settings too soon.

“Every meeting so far is focused on re engagement and reintegration, never looking at or supporting the real issues. Engagement isn’t the issue, it’s what they want him to engage with. He wants to learn, but can’t if needs are unmet and a big part of that is environmental. The classroom doesn’t work for him! Reintegration means conforming neurotypical standards and this is an expectation he cannot achieve and shouldn’t need to. He has an outcome around self esteem & self acceptance all the while being told he has to change who he is. He cannot be reintegrated into an environment that doesn’t work, any more than if you asked an amputee to regrow their limbs.” (Survey respondent July 2022)

Meanwhile, Parents tell us that - by contrast - often independent APs were a safe haven with a more holistic approach - a place to rebuild confidence and trust.

“AP's are brilliant alternatives for children that don't fit in mainstream or special schools. They are the middle children that get left behind at every point when with a little support and the correct method of learning they could flourish and achieve the same as other children..... To support these children and listen and trust parents is a win win. The child receives what they need and the LA save a lot of money.”

(Survey Respondent July 2022)

Parents told us that the focus around attendance, exam results and careers were of little use to them when their children were too unwell to engage and expressed concern that KPIs did not include measures for good mental health but rather focussed primarily on attendance and academic achievement. They told us that short-term interventions for children with SEMH and EBSA is not a solution and evidenced that a swift reintegration to mainstream is not realistic for many of our families and actually often causes more harm.

What we heard loud and clear time and time again was that the process of recovery from EBSA takes TIME!

“Some young people just can't do school. LAs only view AP as a temporary solution to get kids back into school and so their systems are framed around this. For some, AP is just that - an alternative.... long term. This MUST be acknowledged. Restrictions around a provider not being able to provide over 17 hours a week provision or they must register as a school is deeply unhelpful in the context of these kids. Arbitrary rules like this cause problems for kids who need bespoke provisions.”

(Survey respondent July 2022)

After some real success in an AP, one parent told of the fallout of a rushed transition into an inappropriate setting:

“My child wanted to return to education and looked at potential placements and found an independent specialist semh school. This was the biggest mistake ever. We looked at it during lockdown, never saw it when students were there, it looked ideal, believed the hype. Initially my child was ok but the transition was quick. they didn't provide what was specified in Echnp, wouldn't engage with myself, didn't understand anything about masking. My child began to deteriorate, they couldn't cope with the unexpected noise and outbursts of other students. Was told they needed to develop resilience. Again EBSA started.” (Survey respondent July 2022)

We wanted to include here some feedback we have from parents and providers, to illustrate:

- The important role Independent APs can play for students with barriers to attendance, Neurodivergence, mental health needs and emotional-based school avoidance.
- The genuine concern and fear that the moved towards Academisation and mandatory Ofsted registration will see many small independent providers closing and no longer being able to offer support to these children and young people.

Some parental views from our Survey in July 2022:

“It would be tragic if independent APs weren't available to those who have significant barriers to education. Particularly when there is a mental health crisis as part of this”

(Survey respondent July 2022)

“The loss of smaller independent APs would be huge...these provisions can literally be life changing/saving for some young people (including our son). And you can't and shouldn't rush children back into more formal education....AP could be the right place for them throughout their education. If they know your agenda is to return them to the place where they were traumatised (in my son's case), they won't feel safe to engage with the AP at all.”

(Survey respondent July 2022)

“AP has transformed my child’s outlook. The barriers and bureaucracy has nearly destroyed both my MH and my child’s. Some of these full time so called specialist provisions charge extortionate fees but don’t meet needs whilst AP costs a fraction of this. If the law changes and AP providers have to register many will give up as they won’t be able to provide bespoke, flexible provision which actually meets and responds to needs. That will cut off a lifeline.”
(Survey respondent July 2022)

“If APs have to be registered with Ofsted many will close because of all the red tape. Our children will lose access to these provisions and their education outcomes will be negatively affected.”
(Survey respondent July 2022)

“Our game based AP is not Ofsted registered. It’s small and independent. They do not have to do ‘work’ although they can do functional qualifications and animal care. It’s small and quiet and not structured, very low demand. Just what my daughter needed to heal her school trauma. It has helped her confidence so much and she has loved her time here.”
(Survey respondent July 2022)

“My husband runs a very small AP which would most likely close if he had to register with Ofsted. It has been a struggle to keep the provision open, but his project has helped so many young people locally over the years anding small and Independent APs from the list of options open to families, many neurodivergent children with SEMH needs will be left without provision to support them it would be devastating to lose it.”
(Survey respondent July 2022)

“Learn the lesson from when many decent childminders stopped (including our own) when they set OFSTED on them too heavily. Yes they need to have some QA and monitoring, but the whole reason a CYP is with them is because they are not ticking the regular OFSTED-type boxes - and often NOT because they are incapable.”

(Survey respondent July 2022)

4. Performance Measures

Consultation Question 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?

We strongly disagree with the 5 Outcomes on the basis that:

- The measures for success are focussed on attendance and academic outcomes and do not include KPIs for measuring the impact the APs can and should have on improving confidence in education, self esteem and mental health.
- They do not consider the needs of children with EBSA who have barriers to attendance and for whom attendance and reintegration into a school setting may not be possible.
- They are not unpinned by an understanding of the needs of neurodivergent students who are experiencing poor mental health.
- In order to ensure that the needs of students who are at the intersection of Mental Health and Neurodivergence are met, it is essential that Decision Makers consult with specialists in this field and outcomes are amended to reflect their needs.

Detail

In relation to:

Proposals for a reformed and integrated role Alternative Provision:

“20.We propose 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”

EOTAS Matters says:

Parents have fed back to us that they have questions and concerns as to:

- Why do these standards only focus on progress, re-integration into mainstream education or sustainable post-16 destinations?
- Where are the KPIs around Wellbeing or improvement in Mental Health?

Given that Rachel De Souza (Children’s Commissioner and Author of The Foreword for The Big Answer Report) sat on the Steering Group for the SEND Review and The Big Ask research is

referenced in the Review, we were disappointed that findings and recommendations from The Big Answer to not appear to have informed Proposals. Specifically:

Recommendations in The Big Answer included caution around the use of deficit-based language for children post-pandemic.

“Schools will need to strike a balance between acknowledging the need for extra support, and burdening young people with unhelpful pandemic-related labels. Note the sensitivity to language about loss, recovery and high stakes assessment: ‘we still have to do exams [...] after the big section of education that was lost because of lockdown [...] even though we are back [...] we can’t fully catch up on what we have missed making it hard and stressful for both students and teachers’ – Girl, 15” (The Big Answer, Page 35).

The Big Answer featured Policy Recommendations for Schools, which included:

“An urgent focus on improved services to children struggling with attendance, **emotional problems**, and other common consequences of the pandemic” (The Big Answer, Page 39)

We would like to see this implemented as an approach for children who have missed education due to barriers to attendance linked to SEN and not just for those affected by the pandemic. **Many of the families in our Community commented that during lockdown they felt that other families were getting an insight into a little of what life is like for families whose children are unable to attend school all the time.**

“Children want to have good wellbeing in the future, not just now. Among 9-17-year-olds, just over half (52%) said that having good mental health was one of their most important future aspirations, while 31% said that good physical health was one of their most important future aspirations.” (The Big Answer, Page 31)

EOTAS Matters would like to see improved mental health and wellbeing reflected in aspirational KPIs as “measures” rather than these being based purely on academic and vocational achievements.

“There was evidence of a pervasive attitude that academic achievement is the only truly successful outcome from school. This is hugely influential in shaping the emotional and behavioural reality of childhood in England. (The Big Answer, Page 42)

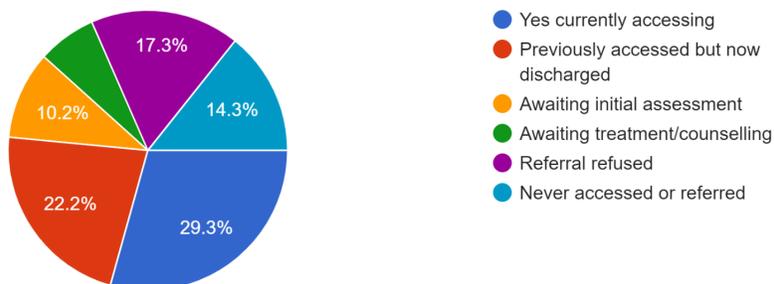
We know that there is a mental health crisis in the UK. Families of children with barriers to attendance are often on the sharp end of that crisis. This is exacerbated by extended waiting

lists for help. Parents tell us that when their children are in mental health crisis they have little support.

The results in our 2022 Survey illustrated that there are many families awaiting access to CAMHS. Over a third of respondents were awaiting an assessment or treatment with CAMHS or had had a referral to CAMHS refused:

5. Has your child ever accessed CAMHS?

266 responses



“My son barely leaves the house and hasn't been in proper lessons since January. We have struggled to access CAMHS, have had an EHCP application rejected, and been told that unless he is declared medically unfit for school by CAMHS then we won't be entitled to any type of provision, but we can't get an appointment for CAMHS and are on a 6 month waiting list. So, we are left to fund the provision ourselves if we want him to have any sort of education.”

(Survey Respondent July 2022)

“27: We propose to;

- make alternative provision an integral part of local SEND systems by requiring the new local SEND partnerships to plan and deliver an alternative provision service focused on early intervention
- give alternative provision schools the funding stability to deliver a service focused on early intervention by requiring local authorities to create and distribute an alternative provision-specific budget
- build system capacity to deliver the vision through plans for all alternative provision schools to be in a strong multi-academy trust, or have plans to join or form one, to deliver evidence-led services based on best practice, and open new alternative provision free schools where they are most needed
- develop a bespoke performance framework for alternative provision which sets robust standards focused on progress, re-integration into mainstream education or sustainable post-16 destinations
- deliver greater oversight and transparency of pupil movements including placements into and out of alternative provision

- launch a call for evidence, before the summer, on the use of unregistered provision to investigate existing practice”

“CAHMs is not fit for purpose, they are failing thousands of children with severe anxiety that makes going to school extremely difficult. The majority of these cases are due to undiagnosed autism or other neurodivergence. This leads to trauma and serious mental health issues. Schools and pupils need better education about neurodiversity, including many professionals.”

(Survey respondent July 2022)

5. Summary

“This government is determined to level up opportunities for all children and young people – without exception. We are just as ambitious for children and young people with special educational needs and disabilities (SEND) as for every other child. This green paper sets out our proposals for a system that offers children and young people the opportunity to thrive, with access to the right support, in the right place, and at the right time, so they can fulfill their potential and lead happy, healthy and productive adult lives.”

(Ministerial Forward, SEND Review Consultation. March 2022)

EOTAS Matters has taken the time to respond to this Consultation because we want to do all we can to make sure that children and young people with barriers to attendance are no longer overlooked. We are hopeful that the reforms to the SEND system do not put further obstacles in the way of families who need to secure provision when their children need something that does not look like conventional “school” for disabled children who simply need to learn differently. We are trusting Decision Makers to use the information we have submitted to do the right thing and ensure - genuinely - that no child is left behind.

We wanted to close this document with the words of families who will be most affected by these Reforms. Below is an entry from our Alternative Provision Survey. These words are from a Parent to 11 Year Old, Non Binary, Neurodivergent Young Person who experienced barriers to attendance for over 12 months. Their child is both Neurodivergent and has Social, Emotional and Mental Health Needs.

“My child's ill mental health sadly had to reach breaking point where they experienced suicide ideation, loss of executive functioning skills, loss of speech, fear of food, visual and audible hallucinations etc. before we were able to gain Alternative Provision. This has been via EOTAS.

My young person receives ongoing emotional wellbeing support from an independent, Neurodivergent-led Alternative Provision and enjoys child-led experiences and activities with two amazing in-person tutors/mentors. My child's self esteem, self acceptance, ability to self direct and self advocate is building amazingly. Yes, their needs and challenges are still great, but they are shining, living, trusting, thriving.

Without this support I dread to think where we would be, but I know we were heading for more darkness.”

As we have shown, families who have secured EOTAS tell us that it has been life-changing for them. They also tell us that the process of securing EOTAS placed them under huge pressures personally, financially and in terms of the wellbeing and mental health of themselves and their children. .

If more families could access **suitable** bespoke provision sooner, we know that more families would be saved from the trauma and pain of fighting for provision for the children in their care. We have hundreds of personal testimonies from parents to support this and have selected just one as an example of the many we have.

The Young Person of the parent quoted above also contributed to the Survey. We used their words earlier in this document. Here we include the full text of their feedback as an illustration of how impactful EOTAS provision can be when children and young people are able to access it: We decided to give them the closing words in our Consultation.

Before EOTAS -

“School was terrifying. They would hold me and not let me leave. I was a prisoner, but without doing anything wrong. I had to do things even though I was scared. Nobody cared. I can't even do the things I used to... Like math, English, my brain stopped, it ruined everything.

After EOTAS was secured -

“I like writing stories my way. I read again because I enjoy it, not forced. I care for my pets. I like going to the farm and helping with the chickens. I look forward to seeing my mentors. I can be me. Nobody scares or forces me to do things now. I want to work with animals.”

This Young Person is working towards Asdan in Animal Care.

Ends

EOTAS Matters would welcome the opportunity to be involved in further conversations and consultations around the SEN Review. Contact EOTAS Matters by email: hello@eotasmatters.co.uk



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