

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

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SNJ's response to Question 13

1. It is hard to understand why the Department for Education has put such a large focus on Alternative Provision (AP) when it makes up such a tiny proportion of children. AP should not be considered as a destination for children with SEND - it is, in fact, a failure if a child is sent to AP without any consideration or proper assessment of their additional needs.
2. 90% of children in AP have an identified SEND - many of those will not have had an assessment of need before they arrived. Of the 10% remaining, we believe that it is highly unlikely that there will be any children who will have no additional needs at all, whether this is because

of unidentified SEND, trauma or another external cause. A full needs assessment should happen well before AP is considered for a child, because a school cannot possibly meet a child's needs if no one has taken the time to discover what they are and the provision needed to meet them. Early intervention is not at the point of a child being moved to AP, it should happen as soon as difficulties emerge.

3. "Alternative" provision is not specialist SEND provision. It should not be used as a staging post until someone decides to figure out why a child is communicating their needs in a "behavioural" way, and then perhaps assesses them and finds the right provision. Nothing in the GP outlines how this will happen, therefore it does not solve the existing problem
4. What MUST NOT happen is for children to be subjected to an ongoing cycle of moving between mainstream and AP without anyone taking responsibility for ensuring their needs are assessed, understood and met with the right provision. These proposals set children up to get stuck in a vicious circle of not having their needs understood, therefore not having them met, then being shunted to AP to 'manage their behaviour' rather than meeting their needs, before being shunted straight back to the same school that still doesn't understand their needs and therefore won't meet them, before the child is shunted back to AP again as their behaviour deteriorates as a result.
5. Too often, the focus is on behaviour as the root problem, without acknowledgement of the cause of the behaviour. Here are some questions the Consultation team MUST answer before moving forward:
 - 5.1. Why is the focus on the responsibility of the child to improve, not on the setting to improve its early identification and support of children?
 - 5.2. Why is the focus on managing the child's behaviour, not meeting the child's needs?
 - 5.3. Why is the focus on keeping the child in mainstream or AP instead of considering they may need a more nurturing or specialist environment?
 - 5.4. How will 'strong behaviour cultures' help children who have SEND, where behaviour is usually a way of communicating unmet needs?
 - 5.5. What evidence is there that blanket behavioural policies are appropriate and helpful for children with SEND?

- 5.6. Who will decide what is in the best interests of the child when parental involvement doesn't even get a mention? This is an alarming oversight as parents know their children best.
- 5.7. Where is the consideration of children with medical needs? Are they to be subjected to strong behaviour cultures too?
- 5.8. Is this about facilitating, 'a calm, orderly, safe, and supportive school' outlined in the White Paper for all children, or a legitimised way to get rid of the problematic child without ever attempting to understand or meet their needs at the earliest opportunity?
6. While good APs do great work, not every AP is good enough and children often do not get the provision they deserve or are capable of.
7. Work should have started in mainstream the moment it became apparent that something may be awry. Investment is needed in early support and nurture programmes. Nurture programmes for social and emotional development should be a massive part of the Green Paper yet they are not mentioned. We would recommend you research the impact of nurture some can be seen here:
 - 7.1. <https://www.nurtureuk.org/research-evidence/>
 - 7.2. and in Scotland here:
<https://education.gov.scot/improvement/self-evaluation/applying-nurture-as-a-whole-school-approach-a-framework-to-support-self-evaluation/>
 - 7.3. How the implementation of a secondary school nurture group relates to whole school approaches and ethos: a case study - ePrints Soton <https://eprints.soton.ac.uk/457342/>
 - 7.4. Whole-school nurturing approaches: A systematic analysis of impact. | Request PDF
https://www.researchgate.net/publication/353168516_Whole-school_nurturing_approaches_A_systematic_analysis_of_impact
 - 7.5. Primary teachers' experiences of the effectiveness of nurture groups on children's social and emotional skills, academic attainment and behaviour.
<https://rgu-repository.worktribe.com/output/1395721>
8. We believe that funding for nurture should be made available to all schools, particularly those in deprived areas. This should start in Children's Centres and Family Hubs (when they materialise).

9. Research should be done to discover the reasons children are in AP to start with and to find out what led them there, and how this could have been mitigated had action been taken earlier. Then you will know where the gaps in training and support within mainstream schools are and you can properly target funding and intervention. This would also increase the likelihood of a successful return to mainstream.
10. The DfE seems to think that 'early intervention' goes hand in hand with AP when this couldn't be further from the truth. Early Intervention should start in pre-school, in primary, and at the latest in Year 7. Children should not have to reach a crisis point before they are adequately supported. This is what is routinely happening - early intervention means putting in support as soon as an issue is noticed, not waiting until it has escalated to such an extent that a school can no longer cope.
11. These proposals will give mainstream schools too big a remit to simply dump pupils who do not fit the 'norm' into AP - this includes those with undiagnosed SEND, and those who cannot attend through anxiety or other mental health issues. It's nice that the DfE has such faith that schools will do what is best for the child, but academies, particularly those that are profit-making, do not have fulfilling child potential as their bottom line.
12. While it is a good idea to ensure that AP has stable funding, a move to an AP setting should be a last resort, not, as some schools seem to think, a convenient way to rid themselves of a "difficult" child.
13. It seems that in Southwark, schools have decided not to exclude unless another pupil is at risk. Please study this – if they can do it, in the heart of the capital, then every school should be able to.
14. The DfE plans to make alternative provision an "integral part of local SEND systems" requiring new local SEND partnerships to "plan and deliver an alternative provision service focused on early intervention". While utilising expertise from AP in mainstream, as outreach teachers already do (or did) is helpful, this leads to three issues:
 - 14.1. You are removing teachers from AP where they are needed, potentially without backfilling them or providing additional funding.
 - 14.2. You are telling mainstream schools that they do not need to train their own teachers properly because a flying visit from AP can pop in to fix things. Why not, instead, utilise this expertise to create sustainable training.

- 14.3. In classing AP support as 'early intervention', implies that the duty is not on schools to provide the support as soon as it is necessary, but rather that the intervention can wait until the school placement is breaking down.
15. Making APs part of MATs will only make it easier for mainstream schools to dump children there. What should they care if they're not losing funding for it?
16. Where you say, "Make all AP schools part of multi-academy trusts, delivering evidence-led services based on best practice", where is this evidence? We shouldn't NEED alternative provision free schools if mainstream schools are properly funded to support ALL pupils, not just those that are easy to help.
17. Creating a different "performance framework" (from mainstream expectations) with "robust standards focused on progress, re-integration into mainstream education or sustainable post-16 destinations" is a good idea as this takes the pressure off when there is no need for it. However, children in AP should still have access to the same high-quality teaching as other children and the same opportunities for external examinations. Aspirations should be as high for them as for every child. We would also strongly advocate that the focus should also not be on reintegration to mainstream, but on identifying unmet needs and then identifying the most suitable educational establishment to meet these needs.
18. "Make sure it's clear where pupils are moving to and why they are moving including alternative provision." This is the very least that should be expected and it's shocking that it even has to be suggested as a "good idea". Mainstream schools should be accountable to every child and their parent as to why they cannot help them, and should be able to show that they have taken every step, including an EHC Needs Assessment, before a move to AP is even considered.
19. We agree that all organised and paid-for educational provision should be registered for safeguarding reasons
20. Where a provision is being used for an EOTAS package, it should already be approved as suitable by an LA - if the LA is funding it, they should have confirmation that it is safe and suitable. Are these proposals the right ones?
21. There is also nothing in the Green Paper about children who use non-PRU Alternative Provision because they are too unwell to attend school, such as virtual schools or hospital schools. Ensuring these

children have the same high-quality provision is crucial. If they cannot manage much education, it is imperative that what they can do is of the best quality.

Responses from parents/SNJ readers

NB: These views are those of parents for whom we have acted as a conduit for their response to the Green Paper. The views expressed from here are not necessarily those held by Special Needs Jungle.



1. I disagree. Alternative provision is more environmentally tailored to meet the needs of the children that attend them and are separate for a reason. To mix them would lead to them eventually disappearing and there would be no alternative for children that cannot attend school. It will cause more harm to the children as they are out of school for genuine reasons. It will not improve anything. It is an attempt to integrate these children back into environments that are not suitable for them. The new vision is a poor attempt to bandage the situation and save money.



1. I feel that alternative provision is good for improved outcomes when it has an environment that will be able to meet their needs and is calming for children.



1. My daughter fits into the category of Alternative Provision as her health needs present such a significant barrier to her learning that she cannot access mainstream school.
2. Most children in our local AP units (PRUs) are there because of disruptive behaviour in their original mainstream schools. It seems to me pretty

much all of these children have displayed difficult behaviour because of underlying needs that have not been properly identified and addressed. Most of these children will be SEN. All behaviour is communication and we need to find out what is going on for these children and help them.

3. I strongly believe all children being moved to an AP should be assessed for SEN (Autism, ADHD, Dyslexia, Dyscalculia, Dyspraxia etc).
4. Like everything else, finding out about local PRUs is very hard to do. The system is confusing. I was hoping to find a place that could cater for high anxiety clever girls like my daughter but it simply cannot be found. There is one good local PRU that did have a cohort of girls similar to my daughter in recent years, but the current cohort is one of children with severe learning difficulties which would not be a good match for my daughter who ideally needs to be with children like herself. This system is truly broken! So it's a good idea to try to fix it.
5. I agree that AP schools should be properly funded and not be in the ridiculous situation of not knowing what their funding will be year to year. That is not a way to make a great product!
6. I do not feel comfortable with AP schools being part of multi-academy trusts. All the Academy schools around here are discipline-obsessed boot camps which will not work for children like my daughter. The "strong behaviour culture" of the Academies don't help SEND children. What is your evidence that this helps SEN children? Managing behaviour is the wrong approach – instead, you should be looking at the reasons behind the behaviour. This is standard practice in the US 2E (twice exceptional) education system and should be adopted here. I recommend you look at Bridges Academy in Seattle and their approach to SEN.
7. I do agree that a different "performance framework" is needed from mainstream expectations but do not think this should include a re-integration into mainstream education as that is often not appropriate. This focus on mainstream is a mistake. Our children need a more nurturing and specialist environment.
8. We need proper Alternative Provision instead of focusing on a child's behaviour is about meeting the child's needs. The focus should not be on making it the child's responsibility to improve, it should be about providing the right environment to learn.
9. The EOTAS package must be kept in place. We are on an EOTAS as there is no provision locally that would work for us. On our EOTAS we have

tutors come to the house and this is working really well. Slowly our daughter is recovering.

10. If there was a therapeutic school local to us (eg. a hospital school eg Ellern Mede) we would love to attend. This is the type of school we need.
11. A big concern is there is no mention of parental involvement. We know our children.



1. These proposals are completely wrong and will result in worse outcomes.
2. Children should not be moved to AP without having a statutory assessment.
3. These proposals just give academies an easy route for “managed moves” of “troublesome” pupils out of mainstream.
4. Children with SEND may have behavioural issues because their needs aren't being met. They need to have more support in school - not to be shunted aside.
5. AP focuses on improving behaviour not on meeting SEN. AP is not set up to be a special school or to provide support for SEN and is not a substitute for proper support.
6. AP is completely the wrong environment for many children with SEN. Some children in AP do have genuine behaviour issues and may be loud and aggressive - this would be terrifying for many children with SEND.
7. AP doesn't offer a full curriculum and is not a substitute for mainstream education. Spending time there, especially during secondary school and GCSE years would mean they miss out on vital course work and may never catch up. It's hard enough for children with SEND to get GCSEs; this will only make it worse.



1. Why are children arriving within AP without any or indeed full assessments on them to understand the root cause of their difficulties? To not do this and to move them without understanding is putting

budgetary considerations before the child's best interest. Presumably, you do not want to understand because the result may mean applying the correct and possibly expensive provision. Very short termist, since these children become adults and a "burden" on an overstretched Social Care system.

2. It is unclear how you plan to use nurture in mainstream as part of early intervention and to understand what is occurring in these children's lives/births that have caused the difficulties that you are seeing?
3. What role should AP practitioners have in early intervention? Please explain.
4. Should "early intervention" and "alternative provision" even be used in the same sentence? Surely you should not be speaking at this early stage of a child's education about managing them out of a system without establishing their difficulties and putting in place appropriate interventions/support with expert staff
5. Are these proposals giving academies an easy route for "managed moves" of "troublesome" pupils out of mainstream? I would say that they are. Academies do not have time in their factory production line of pursuing exam "success" to care in any way about the mental health/success of any children within their care let alone those with difficult backgrounds, challenging diagnoses or who do not "fit" their very specific perfect pupil profile.
6. Why is the focus on behaviour as the root problem, without acknowledgement of the cause of the behaviour?
7. Why is the focus on managing the child's behaviour, not meeting the child's needs? Behaviour is a very loaded word and it almost always implies the child is failing to meet the standards set by a school. All behaviour is communication and it is the right of the child to be understood and to be properly assessed and have their needs properly met. Equalities Act and Children and Families Act
8. Why is the focus on the responsibility of the child to improve, not on the setting to improve its early identification
9. Why is the focus on keeping the child in mainstream or AP instead of considering they may need a more nurturing or specialist environment?
10. How will 'strong behaviour cultures' help children who have SEND? What evidence is there that blanket behavioural policies are appropriate

and helpful for children with SEND? They are not and they destroy mental health and self-esteem and cause school-based trauma/PTSD.

11. Who will decide what is in the best interests of the child when parental involvement doesn't even get a mention. We see no mention here of parents being involved or even listened to. Again.
12. Where is the consideration of children with medical needs? Are they to be subjected to strong behaviour cultures too?
13. Who are we confidently serving through this vision for AP and to what extent? It does not seem to be the child, who should be at the heart of any policy change.
14. Which young people are going to benefit; whose 'best interests are being fulfilled? Again, it seems more than the best interests of the Academies and LAs will be met and the child will be ignored. Not sure that's legal.
15. Is this about facilitating, 'a calm, orderly, safe, and supportive school' outlined in the White Paper for all children, or a legitimised way to hive off the problematic child? We would argue it is the latter. Since the former suggests more of an aggressive suppression of thought and personality."



1. Completely disagree. Mixing Some SEND children raises issues but mixing all manner of pupils in an alternative provision will be a disaster. Some Teacher training isn't adequate for normal classrooms let alone for Alternative Provision. SEND children have many and varied needs and the idea of big groups of totally varied needs is no5 workabl3 to produce positive outcomes.



1. What I would say is that the focus should be on making sure a child's needs are identified and considered, and appropriate mainstream placements examined, before an AP setting becomes the decision. Identifying SEND issues in an AP setting strikes me as probably too late in that child's journey.

