



SEN Administration  
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**Response to the Consultation: Proposal to establish 18 part time specialist nursery places at Riverside School from January 2018**

Bromley Parent Voice (“BPV”) submits its response to the proposal to provide 18 part time specialist nursery places at Riverside School from January 2018. This response is based upon the three formal consultation meetings, a pre consultation focus group\* and intelligence gathered from talking with parents and partners across the borough. This was achieved through a variety of events facilitated by the forum and other opportunities to engage through LA led work streams.

**Bromley Parent Voice**

BPV is a forum which aims to be a voice to inform service providers and service commissioners of the needs of children and young people with a disability or additional need and their families. BPV has a membership of over 600 families, and in addition BPV works closely with other representative groups within the borough to ensure they are as representative as possible.

Part of the funding BPV receives is a grant direct from the Department for Education in order to embed a culture of participation and coproduction within the LBB as set out in paragraph 1.13 of the Code of practice for the Children and Families Act 2014

*1.13 Parent Carer Forums are representative local groups of parents and carers of children and young people with disabilities who work alongside local authorities, education, health and other service providers to ensure the services they plan, commission, deliver and monitor meet the needs of children and families. Parent Carer Forums have been established in most local areas and local authorities are actively encouraged to work with them. More information about Parent Carer Forums is available from the websites of Contact a Family and the National Network of Parent Carer Forums*

As a member of the NNPCF BPV’s reach and level of representation extends beyond its direct membership.

It should be noted that during the initial planning of the Riverside nursery proposal, statutory requirements were not met in accordance with the Children and Families Act 2014; parents were not invited to participate during the foundation phases and were only made aware when a course of action had already ensued.

This issue was raised by BPV and this resulted in a meeting of officers from the LA and a small group of parents in July\*<sup>see below</sup>. Formal minutes were not produced from this meeting and it is unclear what purpose this meeting served. BPV are unaware if the points raised at this meeting were taken forward therefore we have included those points in our formal feedback to the consultation.

Only a brief outline of the proposal, for Riverside School to provide a Nursery for children with profound and multiple needs, was given at this focus group. More details emerged with the consultation document. Attendees at the consultation meetings were furnished with even greater detail and we have concerns that such was not in the public domain or in the formal consultation document e.g. The consultation document did not outline how this provision would be met or where within the school the nursery children would be placed.

BPV have subsequently learnt that it is the intention to place the nursery children within the existing Early Years classes along with Reception and Key stage 1 children. We have also learnt that Bromley Healthcare have not been commissioned to provide the additional medical support and therapies for the 18 part time pre-school places. It is a concern that these needs may not have been identified and highlighted to the Clinical Commissioning Group. BPV are concerned that the individual needs of children may not be met and that this demonstrates a lack process around joint commissioning which is a statutory requirement.

The views expressed by at the pre consultation meeting in July are as follows:

1. Riverside School is located on the far side of the borough. There is no statutory duty to provide SEN transport for pre-school children. This raises equality of access issues. No details were afforded around travel arrangements to support families to access the nursery. The travel issues from the families perspective are as follows:
  - 1.1 Extra costs for transport and accessories (parental mileage, car seats, medical equipment).
  - 1.2 Health and safety concerns
  - 1.3 Impact of travel time on a child so young especially those who live on the other side of the borough
  - 1.4 Impact on families with school age siblings or work commitments.
  - 1.5 loss of parental choice and control.
2. Parents expressed that had they been involved in the planning stages, it may have been that they would have requested a more central location.
3. Some parents expressed the view that the extra capacity to incorporate the Riverside nursery should be utilised for much needed statutory specialist provision for school aged children. This could help reduce the requests for costly out of borough placements as highlighted through the SEND4Change review.

4. Riverside School is currently the only accessible provider of daytime Specialist Short Breaks for children with complex needs. There were concerns raised at the prospect of a child attending the same school from 3-18 years, alongside holiday schemes all at the same venue, raising fears of their child being institutionalized. However, some parents expressed a positive view that it provided continuity for their children reducing the trauma of transitioning.
5. Parents asked for clarification as to how the proposal would affect the Pre School Specialist Support service (which includes the pre-school assessment classrooms) currently provided from the Phoenix Centre. Any answers to this question seemed to be lacking in clarity. Parents were initially advised that this proposal would see a realignment of the High Needs block of the Dedicated School Grant and that services at the Phoenix Centre would not be directly affected. BPV have serious doubts on how this can be achieved moving forward within the same financial envelope. The money identified for this provision comes from the High Needs funding which is still under review by SEND4change. As it has been already stated (during SEND4Change focus groups) that the council would not be able to increase the High Needs funding budget, any money taken from this budget would affect High Needs provision elsewhere, if not from the various Phoenix centre services parents would like to know where the effects will be felt.
6. Staff were present from Petts Wood playgroup and they expressed real concern at the financial impact it may have on their service where they provide care for children from birth, but don't receive funding until two or three years of age.
7. Parents spoke highly of the overall care that the Pre School Specialist Support services provide not only for their children, but for themselves as parents. Whilst they welcomed the idea of a specialist nursery provision, it should not be at the expense of the wider specialist offer (birth-18) which has a proven track record of early and effective intervention.
8. Parents raised the following questions which remain unanswered:
  - 8.1 At what age and how will these children be identified.
  - 8.2 What will the assessment/provision look like.
  - 8.3 What happens to those children who are identified late.
  - 8.4 How do you differ between severe/complex or multiple and profound when many children with Autistic Spectrum Disorder or Learning Difficulties do not present their needs so apparently until approximately four years of age.

It was agreed that at this stage, many questions remained unanswered requiring the Local Authority to provide appropriate clarification around the nursery places (e.g. eligibility criteria and offer of services) and transparency about whether a nursery place would automatically lead to a school placement at Reception. This meeting served as a prelude to the three consultation meetings held at Riverside School in the months of September and October where the report had now been officially published and was available for viewing.

### **Riverside Consultation Meetings held at Riverside School.**

Riverside staff are without doubt passionate about their school. The Head teacher and staff members gave a tour of their Early Years facilities and spoke fervidly of their commitment to the school's ethos, values and mission of transforming the lives of children/young people and their families. Current parents also spoke warmly of the school but shared their concerns regarding the impact that the Nursery could have on existing services:

- 1. Health. What does the health provision look like and will this cause a reduction in health services across the community (both within Riverside and wider)?** A health professional from Bromley Healthcare advised that these services would need to be commissioned separately. The Head Teacher at Riverside confirmed that he was unaware of any arrangements to commission additional medical support/therapies for the pre-school cohort. This then raised further questions from other health professionals and parents who were concerned that the health budget had already been allocated for the current year. It does not appear that an allowance for this provision has been made from January 2018. The Community Health contract has recently been retendered. The details of the new arrangements have not been shared with families. Many parents expressed concerns as to whether the existing health services for their children would be affected and it was agreed that further clarification was required by the LA and CCG before parents could make an informed response to this consultation.
- 2. Therapies.** Further clarification is required from LBB regarding the provision of Speech and Language and Occupational therapy within the placement cost. Parents once again felt that they were unable to make an informed response without this information.
- 3. What does the offer look like? How does it affect families' choice and control (See CFA 2014) if required to make a decision at such an early stage?** Many parents experience different emotions during their child's early years and when choosing a pre-school/school for their child. One parent described how she would have felt comforted by such an early secure offer, whilst another parent said her child was very settled at his nursery (Petts Wood Play Group) at present, and would prefer him to attend Riverside at reception. When it became apparent that a nursery placement may not guarantee a school age placement, parents became very concerned. Again a lack of clarification of the offer makes it impossible for parents to give an informed response. The concerns include continuation of education and care from pre-school into 'big' school; lack of available places at Riverside at Reception for those children placed elsewhere are pre-school age. If parents choose an alternative provision to Riverside nursery at pre-school would this preclude them taking up a Riverside placement at a later stage?
- 4. If children are allocated places at an earlier stage, how does this affect places for children of statutory school age and will the extended age range affect my child's learning?** It was advised that the children who will be offered a place at the Nursery would likely have come to Riverside from reception age and would therefore merely be joining a year earlier. However, we were advised that there is no guarantee of a placement being offered. Parents were advised that there would be flexibility of movement to a different school at any stage if the child's needs changed or made significant progress. Parents are still unclear and confused by the mixed messages of the consultation. Some parents of children already at Riverside were very concerned about the impact on their child. The school informed that they anticipate that the age range will eventually be reduced for the Early Years classes.

5. Parents remain concerned that there will be limited number of Riverside places available at Reception age which will have a detrimental effect on the ability to express a preference for a school of their choice.

One last observation. The Code of Practice for the Children and Families Act 2014 states:

*1.11 Local authorities **must** consult children with SEN or disabilities, their parents, and young people with SEN or disabilities in reviewing educational and training provision and social care provision and in preparing and reviewing the Local Offer. It is important that they participate effectively in decisions about support available to them in their local area.*

Whilst we recognise it is difficult to garner the voice of the child in such young children, it is still possible. One BPV steering group member offered this reflection:

*My child attended the Phoenix Pre-school assessment centre classrooms at the age of 3.5. Being within a familiar setting helped ease my child's anxieties which were the driver behind negative behaviours (running off, refusal to co-operate and lashing out). The anxieties stemmed from my child's autism, not from a lack of structure, routine or discipline at home.*

*The various health professionals were able to observe my child over a period of time, at their convenience which was afforded by being co-located within the same building as the assessment classrooms. This period allowed for the necessary health reports towards both a Statement of Education and a diagnosis.*

*My child is now aged 10 and all subsequent assessments with professionals have failed or were severely limited in obtaining information from my child. These include assessments carried out by professionals from CAMHS, St Thomas's Newcomen centre, and an Educational Psychologist. The reason for these failures are purely that my child was expected to perform tests and answer questions, often within an alien environment, all of which heightened my child's anxiety.*

Behaviour is a form of communication and as you can see this child's 'voice' was evident in all of these assessments. We wonder at what kind of assessment would be made at Riverside without those co-located health professionals. If intention is that the assessment is performed prior to entry into Riverside nursery we believe it takes time for children to feel secure enough for a meaningful assessment to take place.

## **Conclusion**

BPV feel that this proposal needs to be considered as part of the whole realignment of Special Educational Needs provision in LB Bromley and not in isolation. We note the consultation report cites this as one of the reasons for the report (Reason for report 1.2) however, the review led by SEND4Change is still ongoing and it is clear from this consultation that the wider impact of the proposal have not been considered.

There are a number of important issues that require further clarification before families can give an informed decision. Too much of the consultation was left unanswered which gives parents the feel that this was just a formality rather than meaningful engagement.

The proposal recommends that Bromley SEND should refocus its directly delivered central services and deliver education within mainstream and specialist schools rather than by the Local Authority. BPV are unable to respond to this recommendation (or on any of the other options outlined) without sight of data (numbers and complexity of need) which has been used to inform the four options set out in the consultation document. The current Early Years Support is considered to be a front runner service by parents in terms of its delivery and excellence; it's also a key reason why Bromley achieved pathfinder status. We are aware there are around 200 pre-school aged children who require a level of SEND support, who currently have access to the Pre-school Specialist Support Service. Many of these will go onto mainstream schools which in part is due to the effective early intervention offer delivered by multiagency partners currently co-located at the Phoenix Centre. These early intervention, centralised and professional services are paramount to the long term outcomes for a child and their families.

Early and effective intervention and securing the best possible outcomes for children and young people form the basis of the SEND Ofsted/CQC local area inspection framework. The existing pre-school specialist support & disability service also provide a family centred approach to children with needs varying from low to highly complex ensuring that the voice of the parents (and child) are heard from the earliest stage in line with the Children & Families Act 2014.

Whilst we recognise the valued contribution that Riverside school makes to supporting the needs of children and young people with the most complex needs in our borough BPV are unable to endorse this proposal until the required clarity is given.