

Report of the Analysis of the Consultation on ‘Scotland’s Ten Year Strategy for the Learning Provision for Children and Young People with Complex Additional Support Needs 2017-2026’

April 2019

Executive Summary

The consultation on the draft ten-year strategy – ‘Scotland’s Strategy for the Learning Provision for Children and Young People with Complex Additional Support Needs 2017-2026’, ran from 5 June 2017 to 28 August 2017. The consultation contained 10 questions aimed at obtaining views on each part of the ten-year strategy.

The ten-year strategy aims to improve outcomes for children and young people with complex additional support needs through strategic commissioning of services; with a particular focus on the provision of education. The strategy also recognises the critical role played by social services and health in supporting educational outcomes. The strategy is set within the context of The Education (Additional Support for Learning) (Scotland) Act 2004 (as amended).

There were 61 responses to the consultation – 14 from individuals and 47 from organisations.

The consultation document asked 10 questions in total – 2 questions on the structure of the document, 6 questions on the content and 2 questions to allow general feedback on how the strategy could be improved.

The aim of the analysis was to present the wide range of views offered. The responses were examined using a qualitative thematic approach and the key points from the analysis are summarised here.

Responses to the consultation varied, some focussed on providing comment on the draft strategy itself and answering the specific question asked. Other respondents used the consultation to comment on current practice around supporting children with complex additional support needs more generally, particularly in relation to the implementation of additional support for learning policy.

The large majority of respondents were supportive of the ten-year strategy while some felt that it lacked important detail. A strong message in the responses was that the ten-year strategy would benefit from including the following:

- A high level timeline and action plan for implementation;
- Detail on how progress in implementing the strategy would be measured; and
- How this would be reported.

The focus of the ten-year strategy on training and development for staff working with children and young people with complex additional support needs, had widespread support. While the majority of respondents welcomed specific Leadership training in the sector of complex additional support needs, many expressed the view that this needs to be done within the context of providing high quality training and development for all staff working in the sector.

The concerns raised in the consultation were not, in the main about a move to strategic commissioning. The majority of respondents were supportive of strategic commissioning with a few respondents highlighting the impact on grant-aided special schools. The only other common concern reported by a few respondents was resources, including sufficient numbers of teachers and support staff, as well as access to specialist provision within the local area.

A summary of the responses to each of the questions is set out below.

Question 1: Is the structure correct? Does the content of the document flow in a logical order?

Most respondents thought the structure was correct. A few respondents suggested that an introductory summary to the strategy earlier in the document would be helpful in providing further context.

Question 2: Does the structure help the reader to follow the strategy effectively?

Most respondents agreed that the structure helped the reader follow the ten-year strategy effectively. A few respondents suggested that a visual aid in the shape of a high-level timeline would be helpful.

Question 3: Do you think the aim of the Strategy and the four objectives are the right ones to achieve the Scottish Government's purpose of improving outcomes for children and young people with complex additional support needs through strategic commissioning of services?

The majority of respondents agreed that the aim of the strategy and the four objectives were the right ones to improve the outcomes for children and young people with complex additional support needs. A few respondents wanted the improvement in outcomes to be within the context of the Getting it Right for Every Child (GIRFEC) wellbeing indicators, however some respondents agreed that it was reasonable to link improved outcomes to the National Improvement Framework.

Question 4: Within the context of The Doran Review recommendations – do you agree with the explanation of why we need strategic commissioning for national provision/services for learners with complex additional support needs?

The majority of respondents were supportive of strategic commissioning with many expressing the view that strategic commissioning will bring transparency and parity to national funding. Only a few respondents expressed concern about the impact on grant-aided special schools.

Question 5: The 'Scope of Services to be commissioned' on page 8 relate to education, care and health, research and training and is informed by the Doran review recommendations and the National Needs Analysis, which was completed in 2015. Can you please comment on any services within those headings, which would particularly wish to see featured here? Please tell us if you think it should exclude any aspects or include any others?

The majority of those who responded to this question were supportive of the five areas identified as being within the scope of services to be commissioned. The main theme under Education was teacher and support staff training and development. The responses to Care were wide ranging, however the main theme was 'types of provision' and where national funding could support gaps in provision around transitions, SEBN and mental health. The responses to Health were similar to those in Care. Again, there was a range of views expressed with the main theme being 'types of provision' and where national funding could support gaps in provision around mental health, SEBN and transitions. Two main themes highlighted by those who responded under Research was for there to be a

focus on looking into the outcomes and experiences of children and young people with complex additional support needs. The majority of responses to Training were supportive of this being an area that national funding could help build capacity by ensuring teachers and support staff working in local provision for children and young people with complex additional support needs have access to high quality training.

Question 6: What are your views on the National Commissioning Groups proposal that the first phase of strategic commissioning will focus on pathfinder (testing) activity on training, development and research? Are there any particular areas of training which should be focussed on?

The majority of respondents agreed that pathfinder activity around research, training and development was the correct starting point and many suggesting that Inclusion Pedagogy and Leadership training were most needed.

Question 7: For the purposes of this document, the National Improvement Framework drivers have been adopted and therefore reflect particular concerns related to children with complex additional support needs? Do you have any suggestions for additions or alternative wording, which should be included? Please set it out against the relevant heading below.

A few respondents felt that this section of the ten-year strategy would benefit from further development, some respondents citing the latest education reform agenda and for this to be reflected in the strategy. A recurring theme in this section was for a high level timeframe and action plan to be included.

There was a range of suggestions put forward in the responses for additional or alternative wording. The National Commissioning Group, when updating the final version of the ten-year strategy, will consider all of these.

Question 8: Do you agree that the Governance arrangements detailed in page 17 are appropriate? If not, what else should be included?

The majority of respondents were in agreement with the Governance arrangements. A few respondents had some concern about the impartiality of the National Commissioning Group and impartiality of the decision making process. The principle of strategic commissioning as a model requires that service users and providers are part of the process. Without this collaborative partnership approach, the principle of strategic commissioning would be lost and this would become a procurement process. Some respondents supportive of strategic commissioning asked that there is a commitment in the ten-year strategy to provide regular progress reporting against the aims and objectives.

A perception amongst a few respondents was that the National Commissioning Group and National Strategic Project Board, lacked representation from parent/carers and children/young people.

Question 9: In relation to the overall 10 Year Strategy – are there any areas missing, requiring strengthening, or which are not required and could be removed?

The common themes identified by most respondents suggested the ten-year strategy could be strengthened by:

- Inclusion of a high level timeline and action plan;
- Information on how progress will be monitored and reported on;
- Including more detail on the transition period and how this will be managed;
- Updating the strategy to include changes from the education reform agenda.

Question 10: Are there any general comments you would wish to make about ‘Scotland’s Strategy for the Learning Provision for Children and Young People with Complex Additional Support Needs 2017-2026’?

There was a broad mix of comments to this question mostly repeating themes already reported. The majority of respondents welcomed the ten-year strategy.

Introduction

The consultation on 'Scotland's Ten Year Strategy for the Learning Provision for children and young people with complex additional support needs' ran from 5 June 2017 to 28 August 2017.

Scotland's Ten Year Strategy for the Learning Provision for Children and Young People with Complex Additional Support Needs 2017-2026 aims to support improved outcomes for children and young people with complex additional support needs through strategic commissioning of national services, with particular focus on the provision of education. The strategy is based on recommendations made in the Doran Review published in November 2012. While the strategy also recognises the critical role played by social care and health services in supporting educational outcomes, the strategy is set with the context of The Education (Additional Support for Learning) (Scotland) Act 2004, (as amended).

The consultation document asked 10 questions aimed at getting opinions on each part of the draft strategy, as well as, allowing general feedback on how the strategy could be improved.

Overview of consultation responses

There were 61 responses to the consultation – 14 from individuals and 47 from organisations.

The consultation document asked 10 questions in total – 2 questions on the structure of the document, 6 questions on the content and 2 questions to allow general feedback on how the strategy could be improved.

All respondents were given the choice to submit their responses anonymously and for them to be anonymous in reporting. 56 respondents gave permission for their responses to be made public and these are available on the Citizen Space website at <https://consult.gov.scot/support-and-wellbeing/complex-additional-support-needs-2017-2026/>. All responses were moderated before being approved for publication.

Methodology

The aim of the analysis was to present the wide range of views offered. The responses were examined using a qualitative thematic approach and the key themes from the analysis are summarised in this report.

Responses to the consultation varied, some focussed on providing comment on the draft strategy itself and answering the specific question asked. Other respondents used the consultation to comment on current practice around supporting children with complex additional support needs more generally, particularly in relation to the implementation of additional support for learning policy.

The analysis is focused on the volume and depth of the responses provided rather than the number of respondents. In other words, conclusions can only be drawn about the comments/information that respondents volunteered. If a respondent did not answer the question, or reference a particular topic, no conclusions can be drawn in relation to their opinions or stances on the issue discussed.

When discussing the prevalence of certain views, either amongst all respondents or within a certain subset, the following terms are used to indicate relative prevalence:

- 'Few' means between 5 and 9%
- 'Some' means between 10 and 19%
- 'Many' means between 20 and 49%
- 'Most' or 'Majority' means between 50 and 74%
- 'Large majority' means between 75 and 89%
- 'Consensus' means 90% or over

Analysis of responses

Introduction

The purpose of this analysis report is to summarise against general themes. This means that a comment made against one question may be incorporated in the summary of the related theme under a different question in the analysis. It is not possible to capture every point raised. Generally, this report does not provide a response to comments or themes raised with the exception of a small number of cases where it is thought helpful or necessary.

Some comments, while having an impact directly or indirectly on education for children and young people with complex additional support needs, were not within the scope of this strategy – for example the need to increase financial budgets around resources for children and young people with complex additional support needs; the provision of services; and support like independent advocacy which is already provided under the Additional Support for Learning Act.

Similarly, there were several requests to add in details or statements about existing education, social care or health policies. Where appropriate, references to existing policies and guidance are made but it is not within the scope of this strategy to include the detail on every policy area. Also, as this is a national strategy, comments about improving provision or services, in specific local authorities or areas have been noted only in the context of the wider points to which they relate.

Where comments have been made in response to questions but relate to other questions these have been recorded under the appropriate question.

Note: percentages shown in the tables may not total 100 due to rounding.

Structure

Question 1: Is the structure correct? Does the content of the document flow in a logical order?

Answer	Total	% of all respondents
Yes	40	66
No	10	16
Don't know	0	0
Not Answered	11	18

Most respondents thought the structure was correct. Comments included ‘The order flows in a logical sequence which makes it easy to read’ and ‘The document flows well, starting with the vision, aims and objectives and moving through to the various components of the strategy, in a progressive manner’. Of the 10 who responded ‘No’ to this question a general theme for that response was that there should be an earlier introduction to why there is a need for the strategy and/or for the strategy to be presented earlier in the document. Comments included ‘We feel the order of the document could be improved by starting with the explicit needs for the strategy rather than its vision’ and ‘We feel the document could benefit from being clearer at the start about the Ten-Year Strategy and what it will achieve’. In responding to Questions 1, 2 and 3, some respondents made comments about the content and other points, rather than the structure. These have been captured in the analysis under other questions, as relevant.

Question 2: Does the structure help the reader to follow the strategy effectively?

Answer	Total	% of all respondents
Yes	38	62
No	10	17
Don't know	2	3
Not Answered	11	18

Most respondents answered ‘yes’ to this question. Comments included ‘The structure is inviting new and innovative approaches’ and ‘The structure is clear and identifies the key issues’. As with Question 1, the theme around introducing the strategy earlier in the document was repeated. A number of respondents made suggestions that visuals showing the timeline for the strategy would be helpful – ‘The structure is fine but we think it would be helpful to see some visuals in the strategy for example a timeline of the strategy...This helps the reader to see how the strategy has evolved and its path over its 10-year duration’ and ‘A diagrammatical timeline would be appreciated’. There were also a number of suggestions for an ‘Easy Read’ version of the strategy to be produced for young people with complex additional support needs and their families.

Content

Section 1. Our Vision, Aim and Objectives

Question 3: Do you think the aim of the Strategy and the four objectives are the right ones to achieve the Scottish Government’s purpose of improving outcomes for children and young people with complex additional support needs through strategic commissioning of services?

Answer	Total	% of all respondents
Yes	42	69
No	6	10
Don't know	1	1
Not Answered	12	20

The majority of respondents agreed the aim of the strategy and the four objectives were the right ones to improve outcomes for children and young people with complex additional support needs through strategic commissioning. Positive comments included – ‘The aim is in line with Scottish Learning Disability Strategy, The keys to life (2013) and The Christie Commission (2011) which highlight the need for strategic commissioning based on quality

of life and outcomes for individuals in Scotland and supported the objectives and views them as 'fitting well within the recommendations of The Doran Review (2012).' Another response stated 'The aims and objectives are in line with wider national objectives and will ensure that this document is relevant and helpful to all local authority services'.

A number of the positive responses called for the 'improved outcomes for children' to be set within the context of the Getting it Right for Every Child (GIRFEC) wellbeing indicators. Some of the comments included 'Overall we agree with the vision, aims and objectives. Although it is mentioned within other areas of the document, it may also be useful to consider the delivery of improved outcomes for children within the context of the GIRFEC wellbeing indicators – we note that these are referenced later, but only in relation to service self-assessment' and 'Yes with qualification. It would be useful to consider the delivery of improved outcomes for children within the context of the GIRFEC wellbeing indicators'.

A number of respondents felt that it was reasonable to link improved outcomes for children and young people with complex additional support needs to the National Improvement Framework's (NIF) six key drivers for improvement: school leadership; teacher professionalism; parental engagement; assessment of children's progress; school improvement and performance information. However, a small minority of respondents did so with a caveat that attainment of children and young people with complex additional support needs has to be broader than a 'literacy and numeracy' measure. One respondent stated 'the value of these objectives will very much depend on how well the NIF articulates a broad understanding of 'attainment. A narrow focus on literacy and numeracy measured in part through standardised assessments will miss the richness and diversity of achievement and attainment for many children with ASN, and particularly those with very complex ASN.'

There were a couple of suggestions to add an additional objective. These related to engagement and views of children and young people with complex additional support needs. One respondent, for example, stated 'we feel there should be an additional objective about making sure that children and young people with complex additional support needs are listened to and actively engaged in decision-making about their education. We believe that this should be at the centre of any policy that hopes to drive improvement in outcomes'.

Finally a number of respondents commented that while they felt the aim and objectives of the strategy were 'welcomed', 'ambitious' and 'to be commended', these comments were tempered with concern over perceived falls in resourcing and funding of additional support needs and complex additional support needs in the last 5 years.

Section 2. Why we need Strategic Commissioning for Learners with Complex Additional Support Needs?

Question 4: Within the context of The Doran Review recommendations – do you agree with the explanation of why we need Strategic Commissioning for national provision/services for learners with complex additional support needs?

Answer	Total	% of all respondents
Yes	44	72
No	4	7
Don't know	3	5
Not Answered	10	16

The majority of respondents agreed with the explanation in the strategy of why we need strategic commissioning for national provision/services for learners with complex additional support needs. Some comments related to the equity of the current national funding for example – ‘The explanation is clear and targets the key issues of equity. Over the last number of years it has felt that finance has been directed to services which mainly meet the needs of children and young people within the central belt. It is hoped that the rationale for strategic commissioning as this moves forward will redress this balance’ and ‘Increased parity of experience across the country is required in order to ensure that all children with complex ASN receive appropriate services and support regardless of geographical location.’ A similar comment from another respondent said – ‘In remote and rural areas, where specialist services are not so readily available, a national commissioning approach would be of benefit to ensure achievement of the objectives within the Strategy. The explanation provided supports this approach’.

Another respondent commented ‘We welcome the commitment to increased strategic commissioning of services. Its use is necessary to make the best use of available resources, based on the needs of children and young people with complex additional support needs, and informed understanding of what services work most effectively in meeting these needs.’

There were other comments on the current model of national funding. One respondent commented that while in principle they agreed with the need for strategic commissioning, they also highlighted concerns that future changes under strategic commissioning ‘could make matters worse for pupils and provider organisations.’ Another respondent suggested that the current grant allocation did need to be reviewed to ensure that ‘those children currently with the most complex additional support needs receive the specialist interventions they need.’

A theme from a number of responses was that while supportive of strategic commissioning in principle; concerns were raised around the ‘lack of detailed and comprehensive available data’ currently available. They requested additional statistics/data on children and young people with complex additional support needs and that strategic commissioning decisions must be based on the analysis of that data.

Question 5: The ‘Scope of Services to be commissioned’ on page 8 relate to education, care and health, research and training and is informed by the Doran Review recommendations and the National Needs Analysis, which was completed in 2015. Can you please comment on any services within those headings, which would particularly wish to see featured here? Please tell us if you think it should exclude any aspects or include any others?

Overall, there were 61 responses with answers to one or more parts of Question 5.

Service	Total number of responses
Education	41
Care	30
Health	32
Research	37
Training	39

The National Parent Forum of Scotland stated – ‘We are encouraged by the ‘Scope of Services to be commissioned, which is a comprehensive list.’

Education

The main themes covered in the 41 responses to education were:

- Teacher / staff training, learning & development;
- Types of provision;
- Capacity building and local delivery;
- Early years.

Teacher / staff training, learning & development

Respondents highlighted the importance of training, learning and development for all staff working with children and young people with complex additional support needs. A number of responses emphasised the importance for teachers to have the appropriate training to support pupils with additional support needs. This will optimize pupils learning opportunities and attainment potential, and ensures pupils with additional support needs are taught and supported in a truly inclusive environment ‘Training builds pedagogical skill and ensures more effective and consistent delivery. It enhances inclusion and this needs to be the aim.’

A few respondents raised concerns in relation to investment in teacher/staff training – ‘The learning and training of staff is something that needs substantial investment.’ There were also other concerns over workforce planning and initial teacher education (ITE). A few respondents mentioned perceived shortages in experienced and qualified teachers of pupils with a visual impairment (QTVI) – ‘Students with visual impairment rely on QTVI to support their unique needs to give them access to an education equal in standard to that of their peers. The number of active QTVIs across Scotland should be monitored to anticipate any downward trends in the number of QTVIs and any shortages.’

Some responses expressed the view that the time spent and the content of training additional support needs during Initial Teacher Education, was not sufficient to adequately equip new/probationary teachers with the knowledge and skills required to best support

pupils with additional support needs. One respondent stated 'Provision for supporting learners with complex additional support needs should not be just postgraduate as an add on or afterthought. Should be front and centre of all ITE training.. .'. '

Some responses recognised the knowledge and skills of professionals working within the independent school and residential sector. There were calls to share learning and expertise between professionals in those sectors and the public sector.

A message from most of the respondents was that Leadership, as well as the wider professional learning opportunities needed to be a key focus of the strategy – 'The focus on effective leadership is also very much welcomed, with access to professional learning opportunities for a range of staff.'

Type(s) of provision

The types of provision identified as needing to be commissioned within Education were:

- Social, Emotional and Behavioural Needs (SEBN);
- Autism;
- Mental Health;
- Assistive / specialist Equipment including augmentative & alternative communication;
- Transitions.

Some local authorities identified that there were gaps in good transition services and many respondents had concerns that there was not enough expertise to support young people with complex additional support needs to move on to successful and meaningful outcomes post 16+.

Many respondents felt that more needed to be done to support this group of young people – 'We firmly believe that training, career and work opportunities should be included prior to the current transitional transition year planning. Career planning should indeed start at the earliest opportunity but no later than at age 14.' Another respondent stated – 'We welcome the commissioning of services which look toward positive employment outcomes for children and young people with complex additional support needs.'

Transitions featured prominently and this theme was repeated in responses to other areas of the consultation and are reflected in other parts of this report.

Capacity Building / Local Delivery

Over half of the 41 responses raised the theme of Capacity Building and Local Delivery. The majority of these suggesting that National Funding for learning provision for children and young people with complex additional support needs should be more focused towards supporting local authorities build capacity and wherever possible deliver services at a local level – 'The emphasis should be on capacity building to ensure children and young people have their needs met as locally as possible' and 'Close liaison with local authorities in relation to the range of provision available will be vital.'

Some respondents suggested that under Education Reform, Regional Improvement Collaboratives could be a potential vehicle to aid the Scottish Government and the Doran

National Commissioning Group identify where there are gaps and/or improvements needed in local services and how national funding could support capacity building.

A few respondents expressed a different point of view. This included the view that capacity building did not need to translate as local delivery, but that grant-aided special schools have that role already to capacity build where mainstream provision is not sufficient – ‘The existing GASS provide high quality education and address (increasing) gaps in mainstream provision. This provision of national services should continue. Further provision of, and support for, training for educational and support staff in mainstream settings is required’ and ‘The principle of ‘provision being locally provided wherever possible and inclusive in nature’ does not reflect the entirety of services offered by some organisations which are specialist, and provided on a periodic basis and due to their specialist nature, are not widely available within the child and young person’s local environment.’

A few of the local authority respondents recognised the value of provision from grant-aided special schools, however the geographical location of the schools remains a factor – ‘While it is important that direct services in relation to care, health and education are retained for those children and young people with the most complex additional support needs it is very encouraging to see that the commissioning will extend to research, training and the delivery and support of services within and across local authorities. To date, to access support from grant-aided special schools, children and young people from more remote authorities were required to live outwith their home and local community. Building services to increase the capacity of staff across services within local authorities will have significant impact on the successful inclusion of children and young people within their family, school and community.’

In summary, there is recognition of the value added by grant-aided special schools but also a wish to see services delivered in such a way as to ensure that children and young people can remain in their communities.

Early Years

Some respondents highlighted a lack of any detail in the 10 year strategy pertaining to early years provision; even though there are references to this in the Doran Review – ‘We think that education services commissioned should include early years and early intervention services that can support early years and education practitioners to better meet the needs of children with complex additional support needs in early years settings. This is particularly important in the context of the extension of early learning and childcare and could be linked to the proposed early years inclusion fund.’

Finance/Resources

There were a few references to finance and resources around teacher pay, national control of ASN budgets and/or ring fencing ASN funding and provision. As stated earlier finance and resources are not within scope of the ten-year strategy consultation.

Care

There was not as many common responses on the topic of Care. An eclectic range of comments were provided, however the main themes are as follows:

- Types of provision;
- Integrated Planning;
- Staff training & learning;
- Family engagement/advocacy and children's rights;
- Self-Directed Support.

Types of provision

In relation to types of provision that should be commissioned under Care, there were some themes that were also raised under Education. These were:

- Transitions;
- Social, Emotional and Behavioural Needs (SEBN); and
- Mental Health.

Other types of provision identified under Care were:

- Respite; and
- Out of school care.

Some respondents felt that wider Respite provision was required to support and strengthen the principles of Mainstreaming and Inclusion. Lack of respite support can put strain on families and the child or young person with complex additional support needs – 'Respite care should be considered more fully for children with complex needs who are perhaps supported in home and community more than they have been in the past' and 'Respite opportunities need to be recognised as a core element for children and young people with severe and complex learning needs, and they should be given the opportunity to participate in social experiences (clubs, activities) to promote wider achievement.'

Integrated Planning

A few respondents emphasised the importance of joined up working and integrated planning. Most felt that while this principle was widely acknowledged as 'best practice' the reality was that good joined up working and integrated planning was used inconsistently. Some comments were:

- More creative pathways should be considered;
- Care and support planning must take account of future education/work/training opportunities and be fully included in these plans. Planning should be streamlined between health, education and social work services to ensure a seamless and person centred service for the individual;
- Social work input should be an integral part of future planning meetings. Transition from child and family to adult services requires a co-ordinated approach;
- We agree with the overall scope of services included but would note that the need for a partnership approach should be given greater emphasis. This more joined up approach and inclusion of the overarching child's plan should be considered as part of the scope of services to be commissioned.

A few commented on the reasons behind 'drivers' in local authority decisions to place a child or young person into a special school. One highlighted that in many cases the decision to place a child or young person in a special school was driven by social care rather than educational needs. Another respondent highlighted that a lack of local specialist provision or difficulties accessing suitable local provision; was often the driver to placing children and young people out with their local community and into special school provision. Respondents felt this issue should be directly addressed in the strategy. Comments included - 'As in many cases the key driver for placement independent special school is not principally educational but social care this needs to be addressed directly in the strategy. Although the roots of the funding lay in education this needs to be extended to full address the world of getting it right for children and young people' and 'Finding from our joint inspections have been that some children and young people had difficulty accessing specialist resources/placements within their local communities or local authority area. The Strategy should address the intention (and potential challenges) of ensuring there is local provision to meet identified need, wherever the child lives in the county.'

Staff training & learning

A few respondents raised staff training and learning as an area requiring support. One respondent felt that 'substantial investment' was required for staff working with children and young people with complex additional support needs, highlighting a lack of good staff training and basic awareness in autism.

Self-directed Support

A few of respondents raised Self-directed Support as another area needing to be addressed within the strategy. One stated – 'The importance of Self-directed Support in maximising the way in which people / families can maximise taking control of their lives also needs to be central to any consideration of national needs assessment. People increasingly wish personalised solutions, adopting unique approaches to address their need for support, and this needs to be considered prior to any population wide needs analysis' and another respondent said – 'Need to take account of fact that strategic commissioning of services has changed due to SDS.'

Health

The responses were similar to those received in relation to Care. There was not much consistency in terms of themes and the range of views expressed, however the main themes covered in the 32 responses, are as follow:

- Types of provision;
- Integrated Planning;
- Staff training & learning;
- Finance/Resources;
- Building capacity/Local Provision.

Types of Provision

In relation to types of provision that should be commissioned, once again the reoccurring themes of Mental Health, SEBN and Transitions were raised.

A few respondents raised mental health. They felt that more mental health provision was required for children and young people. One respondent highlighted the need for targeted mental health resources for children and young people with SEBN – 'These specialist

interventions are not always readily available for children with SEBN and more targeted mental health resources are required in order to ensure the availability of such services and allow children the help they need.'

Though not directly mentioning Regional Improvement Collaboratives specifically, one respondent did make the that link, that improving mental health provision for children and young people would take regional collaboration – 'Mental Health and Wellbeing needs, particularly among adolescents, is an area which requires regional collaboration and commissioning.'

Integrated Planning

The theme of integrated planning and joined up working was also a focus in relation to Health. A few respondents raised the issue (similar to the Care responses) that continued improvement was needed in integrated planning and joined up working between Education, Care and Health. Some of the comments were:

- 'Healthcare provision for children and young people with complex additional support needs should be as integrated as possible with their educational and care provision.';
- 'Co-locating health and social care children and young people services alongside education will enhance support for children and young people with complex additional support needs. We would also wish to see an emphasis on the health team supporting the children and young people with complex additional support needs to engage in education.';
- 'Vastly improved links with all areas of health in particular complex medical needs, mental health etc.';
- 'Collaborative health services that identifies, prioritise and focus on these children and young people with complex additional support needs.'

Finally, another respondent suggested that, when making decisions on commissioning services, collaborative working between health and education services must be taken into account. An example of a 'Baseline Pathway'¹ model developed by The Visual Impairment Network for Children and Young People (VINCYP) was put forward as a good example.

Staff training & learning

A few respondents raised staff training and learning in relation to health. One respondent called for more investment in staff training and learning and another respondent felt that improved links within branches of the NHS for training and resources was one way to deliver improvement.

Finance and Resources

There were a couple of references made to finance and resources. One respondent raised concern about the availability of Allied Healthcare Professionals and perceived local shortages which impact heavily on ability of 'the whole team around the child' being able to meet the needs of a child or young person with complex additional support needs.

Another respondent felt, that while there was a commitment to the continuation of direct education, care and health services as part of the strategy for strategic commissioning, they would support it only if this was not to the detriment of the current provision.

¹ <http://www.vincyp.scot.nhs.uk/professional-resources/pathway/>

Local Provision

A few respondents referred to access to provision being delivered locally and within the community of the child or young person with complex additional support needs – ‘Health is a universal service – how might it be engaged in the commissioning service? How can therapies be localised and on site in local communities to prevent the need for the child to be removed from his/her community.’

Scottish Government Consultation on Guidance on Healthcare in Schools

In 2017, the Scottish Government conducted a public consultation on updated guidance on ‘Supporting Children and Young People with Healthcare Needs in Schools’ – following this consultation new guidance was published on 20 December 2017². This guidance document is for NHS Boards, education authorities and schools to support children and young people with healthcare needs in schools. Social Work Scotland in their response under Health have suggested that reference to this guidance and links to it should be included in the strategy.

Research

37 respondents commented on this section. Only one respondent stated that they did not agree that research should be in the scope of services to be commissioned. The large majority of respondents agreed that research should be in the scope of services to be commissioned.

Three respondents stated they could not agree or disagree with research. The reason given was a lack of information and/or transparency about what types of research and how that research would be commissioned. Two respondents asked for clarity on how the quality of the research would be assured.

From a few of the responses it was evident that it was felt the strategy would benefit from providing more clarity around what research (‘into the experiences of children and young people with complex additional support needs’) had already been completed by the Doran review.

The main themes to emerge under Research were:

- Outcomes; and
- The experiences of children and young people with complex additional support needs;
- Good practice;
- Definition of complex additional support needs;
- Informal Exclusion.

Outcomes and experiences of children and young people with complex additional support needs

14 of the respondents highlighted either outcomes and/or the experiences of children and young people with complex additional support needs as the most important area that requires research.

² <http://www.gov.scot/Publications/2017/12/3694>

Respondents felt that currently there was no clear national picture of what represents achievement or positive outcomes for children and young people with complex additional support needs. CoSLA stated 'We need more information about the children and young people collectively who are attending the seven grant-aided special schools and the three education support services that receive recurrent funding from the Scottish Government, in order to consider how their needs are currently met and how children with similar needs could be supported in future.'

Social Work Scotland in a similar note commented 'it isn't clear whether any of the proposed research will address the gap in understanding what the long term outcomes are currently for children in specific specialist facilities and the anticipated outcomes if we were to move to different models..' and another respondent stated 'the commissioning of independent research will be important in monitoring and assessing the impact of existing educational provision on achieving outcomes for children and young people with complex additional support needs.'

Another respondent commented 'we feel this 10-year strategy offers an opportunity to commission research on the longitudinal post-school destinations of learners with complex needs so more is known about their educational outcomes and the likelihood of maintaining post-school destinations.'

One of the local authorities who responded to the consultation made the following point – 'Research which focuses on outcomes for children and young people who have experienced a range of support/provision (both local authority and outwith specialist provision) would gain an insight into the implementation factors required to ensure that we commission the right support/provision at the right time.'

A few respondents felt that research should include or be stand-alone research into the experiences of children and young people:

- '...research must include children's experience of education and support to access education so that we are better informed about how well we are meeting the holistic needs of children and young people in our learning provision';
- Commissioned research should focus on increasing understanding of the educational and habilitation experience and outcomes of the young people themselves.'

Good Practice

A theme raised by some respondents was to take learning from other good practice and to consider this alongside other research not only in Scotland but across United Kingdom as well as internationally:

- 'While there is recent research into 'what works' in Europe and England/Wales, a close look at what's working well in Scotland would help to share effective practice.';
- 'It is important that research questions are identified and current research (including that of international field) are considered; research for research sake is not needed.';
- 'It would be beneficial for the report to reflect the fact that there is already a significant amount of research around supporting children with complex additional support needs some of which has been developed in response to the Doran review.'

Definition of Complex Additional Support Needs

One respondent suggested that research could be undertaken to develop a definition of complex additional support needs – ‘The description of complex additional support needs is a helpful starting point but a more robust definition needs to be researched and developed in order to help determine which children have the greatest needs and therefore require support via these funds.’

Informal Exclusion

Enquire suggested that research into informal exclusion would be helpful – ‘We have received an increase in the number of enquiries about children out of school for a reason other than a formal exclusion and think it would be helpful for research to be commissioned to better understand the reasons behind informal exclusion, their number and level of education being provided for children and young people with complex additional support needs out of school.’

Training

39 respondents commented on this section. The large majority of those respondents confirmed that training should be in the scope of services to be commissioned.

In last year’s consultation on ***‘Empowering teachers, parents and communities to achieve excellence and equity – a governance review’***³ one theme that emerged in relation to supporting pupils with additional support needs, was Initial Teacher Education and Teacher Training. A few respondents in this consultation also raised this theme. The National Parent Forum of Scotland stated – ‘Parents frequently tell us that they would like staff, working with children with all levels of ASN, to undergo more thorough training.’

Respondents felt that Initial Teacher Education (ITE) around additional support needs and inclusion needed strengthening. In relation to the training student teachers receive in supporting pupils with additional support needs some of the comments were:

- ‘#IncludED in the Main found that 98% of the education workforce feels that teacher training does not adequately prepare them for teaching young people with learning disabilities. We therefore believe modules on Disability Inclusion, Additional Support Needs strategies and Positive Behaviour Support should be incorporated into ITE programmes, as well as into the new Masters Qualification for Headship.’
- ‘Training embedded within teacher training programme would be welcomed to ensure that all newly qualified teachers added coming into the profession with an understanding of the needs of children with the full range of additional support needs.’

A couple of respondents provided suggestions on how ITE could deliver improvement on training around additional support needs:

- ‘All schools have children and young people with additional support needs and a compulsory placement within an additional support needs context for teachers in training would help develop empathy, knowledge and understanding of this area.’

³ <http://www.gov.scot/Resource/0052/00521034.pdf>

- ‘Targeted resourcing in order to support student teacher placements and probationary opportunities within special education provision also requires a more strategic approach.’

In relation to on-going teacher training and professionalism, many respondents felt that further training on supporting pupils with additional support needs was crucial. Comments included:

- ‘Mandatory additional support needs training at schools’
- ‘Compulsory placement in additional support needs establishment/base is crucial.’
- ‘#IncludED in the Main found that 30% of education professionals felt there was not enough specific CPD for teaching young people who have learning disabilities. There is a clear need for the Scottish Government to commission new accredited CPD courses on learning disability.’
- ‘Uptake of these CPD courses by education staff should be monitored as part of the National Improvement Framework.’
- ‘would welcome an increased availability of specialist complex additional support needs knowledge and additional support for learning staff... SCLD would promote training of specialist Additional Support Needs teachers...’

A few respondents suggested that some investment in national training models / pathways would be helpful:

- ‘Further national training to be shared so models are consistently understood across all authorities and not disparate between authorities. More examples of national models of approaches.’
- ‘Models of good practice would be helpful.’
- ‘There needs to be a nationally approved standard and rigorous follow through. Local variation can be within agreed parameters. There should be a commonality to ensure equity across Scotland.’
- ‘Systems in place to support national provision to support local authorities.’

One respondent indicated that there might be potential through the new Regional Improvement Collaboratives to deliver training more strategically across regions, which could be especially beneficial for remote and rural areas.

A few respondents raised the theme of finance and resources, calling on increased investment in teacher and support staff training in additional support needs.

Section 3. 10 Year Strategy

Question 6: What are your views on the National Commissioning Groups proposal that the first phase of strategic commissioning will focus on pathfinder (testing) activity on training, development and research? Are there any particular areas of training which should be focussed on?

49 respondents commented on this section. 3 respondents gave a definitive ‘No’ to pathfinder (testing) activity on training, development and research. 2 felt that this was the wrong starting point, one suggesting that the ‘starting point should be the child’ and the other that the funding should be directed toward direct services that benefit the children.

18 respondents indicated that pathfinder (testing) activity on training, development and research was the correct starting point – ‘...these initial steps could play a useful role in supporting the development of the Strategy, and in ensuring that it meets its aim and objectives.’

6 respondents confirmed that they felt unable to agree or disagree, citing a lack of information or clarity in the strategy as to what the pathfinder activity would include.

Due to the structure of the answer in the 20 remaining responses, it was not possible to determine whether they agreed or disagreed with the proposed pathfinder approach.

The following were the main themes identified by respondents as areas requiring pathfinder activity:

- Inclusion Pedagogy and CPD Pathway;
- Leadership training;
- Online & distance learning;
- Research on attainment / outcomes;
- Parental and Child Engagement;
- Social communication and positive behaviours.

The most common area identified by respondents for the focus of pathfinder activity was training and development. The majority suggested that teacher training and development in Inclusion Pedagogy was vital with a few respondents calling for the development of CPD/CLPL Pathways:

- ‘Inclusive pedagogy should be prioritised on training. This needs to be universally identified with an agreed CPD pathway.’
- ‘Training needs should focus on a generic programme for all practitioners in all areas of complex additional support needs.’
- ‘We recommend that training should focus on Inclusion for children and young people with complex additional support needs..’
- ‘Modules on Disability Inclusion, Additional Support Needs strategies and Positive Support should be incorporated into Initial Teacher Education programmes, as well as into the new Masters Qualification for Headship. ‘
- ‘Access to high quality continuous, relevant and timely professional development is equally – if not more – important to support teachers in their role.’
- ‘Our members consistently tell us that they need more support to deliver the best outcomes for children with ASN. Specialist CLPL requires adequate resourcing and it is vital that this is factored into the pathfinder phase.’

Two respondents suggested that the development of the training should be multi agency, including input from those in the specialist/independent sector – ‘The skills and experience of the special sector could be utilised to facilitate training for staff at all levels.’

Another idea put forward from a few respondents was the suggestion that ‘Online and/or Distance Learning’ should be invested and developed for the Pathfinder activity as this would ease access issues and reduce training cost.

Leadership training was also highlighted as an area that the Pathfinder activity could focus on. One respondent said – ‘modular leadership training which links theory to practice and has a strong experiential element, providing pathways for progression for leaders’.

Training and research into attainment and outcomes for children and young people with complex additional support needs was an area raised in a couple of the responses. One respondent suggested that training, in how to track and monitor is needed – ‘Training in tracking and monitoring progress for this population of children and young people should be developed and delivered’. Other respondents felt that research that supported the development of a framework/model that identified and measured positive outcomes for children and young people with complex additional support needs was much needed for this area of education provision. This links back to earlier themes reported in Section 2, Question 5.

Another theme from responses to this question was parent and child engagement. The response were not clear whether they were advocating research or training or both. A couple of responses suggested that training for staff in ‘effective and useful engagement with the parents/carers and children’ for whom decisions will impact on, is needed – ‘Training to that extent needs to support and promote “the team around the child” and promote an understanding of the impact on the family in caring for a child with additional needs.’

A few responses also highlighted Social Communication and Positive Behaviours training. Indicating this would benefit teachers and support staff, working with children and young people with complex additional support needs – ‘Communication, understanding how an individual communicates and engages is core and prevents misunderstanding about communicative behaviours which challenge.’ A few respondents highlighted the work of CALL Scotland in supporting communication – providing training for teachers and support staff in the use of Assistive Technologies.

Finally, a few of the respondents suggested that the strategy would benefit from outlining a plan for implementation.

Question 7: For the purposes of this document, the National Improvement Framework drivers have been adapted and therefore reflect particular concerns related to children with complex additional support needs? Do you have any suggestions for additions or alternative wording, which should be included? Please set it out against the relevant heading below.

Overall, there were 61 responses with answers to one or more parts of Question 7.

Service	Total number of responses
Service Leadership	31
Education Services	32
Practitioner Professionalism	34
Parental Engagement	35
Assessment of Children’s Progress	35
Service Improvement	31
Performance Information	28

A few respondents felt that this section of the strategy would benefit from further development. Some respondents citing education reform as the reason.

One suggestion for further development of this section, and a recurring theme, is for the strategy to include a timeframe. Specifically, five respondents suggested this section of the strategy could be improved by the inclusion of a timeframe and plan for implementation.

Service Leadership

A few respondents felt that the first three sections under 'Service Leadership', 'Education Services' and 'Practitioner Professionalism' should be one section, suggesting these come under the title of Leadership and Professional Development. A few respondents suggested that the National Improvement Framework should not be further developed for this group of children, citing the Framework as it stands should apply to all children and young people, including those with complex additional support needs.

There were four suggestions for alternative wording for this section:

- Change 'Leaders at all levels and in all relevant services should evidence on-going professional learning commensurate with their areas of practice and responsibility' to 'Leaders at all levels and in all relevant services must evidence on-going professional learning commensurate with their areas of practice and responsibility.'
- Change 'on-going professional learning' to 'on-going learning and practice.'
- 'It would be helpful to add 'across sectors and disciplines including education, social care and health' to this section.'
- 'Re-word 'Leaders at all levels' to 'Everyone at all levels.'

Two respondents put forward the suggestions that there should be a requirement for ASN authority leaders and/or ASN specialist to have an appropriate qualification, such as an ASN Masters level qualification. Observing that in some local authorities, someone who did not have an appropriate qualification, skills or knowledge of working in the additional support held the position of ASN Manager.

There was also a suggestion that there needed to be a greater emphasis on evidence of service leadership in the complex additional support needs sector/field. With the suggestion that a way to do this could be through local outcome improvement plans with identified Key Performance Indicators (KPIs). There are some local authorities who have adopted this approach and it was suggested that some evidence gathering could be undertaken to identify good practice.

Education Services

Many welcomed the development of appropriate leadership development programmes within the area of complex additional support needs. Acknowledging that these would build and link to already established Education Scotland and SCEL Frameworks and reflect collaborative working with Universities and the GTCS. Most agreed however, that this area needed further explanation and suggested that a flow chart or leadership model would help to illustrate how this section of the strategy would work in practice – 'A table or flow-chart to illustrate how the strategy will work in practice would help to clarify...' and 'The second paragraph states that "Practitioners in the writing, delivery and involvement in the initial programme will reflect input by senior managers across all sectors, working collaboratively." More information on what this collaborative working will look like would be welcome.'

One respondent stated 'These paragraphs should be polished, as it is currently difficult to follow what this section means for commissioning decisions. It seems that most of the points made are about evaluation and, if this is the intention, this should be made clearer.'

EIS stated 'We broadly support the approach suggested, but would reiterate our view that 'leadership' as supported by new development programmes should be conceived of as a shared endeavour across all levels of education, and we would endorse a distributive model of leadership, which includes all educators and not only those who are in promoted/senior management posts.'

One respondent stated 'The involvement of a wider group of collaborators in the development of the leadership development programme would be beneficial and that family/carers/parents are also involved in the development as they and their children are the end recipients of service.'

Practitioner Professionalism

While most respondents were supportive of this section on Practitioner Professionalism the majority expressed the view that the strategy for Practitioner Professionalism should be wider, bolder and not to just focus on teacher professionalism. A few respondents called for this section of the strategy to be widened to include other professionals working with children with complex needs – 'support staff, classroom assistants, lunch and playground supervisors and go beyond the school gate; look to widen this to all professionals supporting children with complex additional support needs such as, Allied Health Professionals, Social Workers and other agency staff.'

The other main theme to emerge in response to this section was a call to look beyond just delivery through study at Masters Level. Some respondents asked that other accreditation methods were explored.

Enquire suggested this section of the strategy should reference the Doran Review, as well as reference the National Improvement Framework. Specifically referring to the Doran Review recommendations about training and development in Recommendations 2, 3, 5 and 6. However, the Scottish Government did not accept Recommendation 6 of the Doran Review, as it is for local authorities to plan their resources according to local circumstances and priorities. Recommendation 3 was partially accepted by Scottish Government. The actions relating to Recommendations 2, 3 and 5 are complete and the strategy will make reference to these and actions taken.

Finally, a few respondents highlighted the recent announcements under Education Reform and ask that this section be reviewed during the consultation to consider this.

Parental Engagement

This section was widely supported by 34 of the 35 respondents who responded. However, the supporting comments were wide ranging, making identification of common themes/ideas and suggestions difficult.

Most respondents welcomed the proposal for initial action research but highlighted that the timescale mentioned in the strategy of 2016-2018 was no longer realistic unless this research had already begun.

One respondent stated - 'Effective parental engagement will be central to success. The existing funding to grant-aided special schools, in some instances, has created a

perception that this is therefore the most effective and desirable way of meeting children and young people's needs. The impact of removing young people from their local community can be life-long. It is hoped that this strategy will reinforce the importance of inclusion and provide support to ensure that inclusion is highly effective in improving outcomes for children and young people with complex additional support needs.'

In addition, some respondents called for the key theme of transitions to be widened to cover all aspects of the child and/or young person's journey – 'Parental involvement and engagement should be consistent and good practice embedded throughout that journey.'

Two respondents highlighted previous research projects. One was in relation to the involvement/engagement of the child/young person their parent/carer/family in transitions – this was the '**Facilitating Inclusive Education and Supporting the Transition Agenda (FIESTA): Best Practice Report**' dated February 2014.

One respondent suggested that it would be helpful if there were examples given to illustrate what was meant by 'strong partnership working'. They felt the term was broad and gave a sense of expectation for the strategy and therefore, the strategy should be clear 'what effective partnership working looks like.' The Code of Practice for Additional Support for Learning⁴ provides information on 'strong partnership working' as well as, case studies.

It was highlighted by a few respondents that the mention of 'the corporate parent' had not been used or referenced elsewhere in the strategy; and it was not until section that the term 'corporate parent' was used. It was suggest that it would be helpful for a Glossary to be added at the beginning which exemplated that the definition of parent in the strategy included carer and corporate parent.

Assessment of Children's Progress

There were 35 responses to this section. Twenty respondents confirmed they welcomed research and trialling of a range of assessment models to assess the progress of children and young people with complex additional support needs. However, a few of these respondents felt that providing more clarify and/or detail would benefit understanding and manage expectations around assessment. A couple of comments were:

- 'It would be beneficial to clarify whether the trialling of assessment models comprises newly developed models or an evaluation of existing models. It may be beneficial in the first instance to collate different models being used across Scotland.'
- 'The strategy requires more detail on the trial of a range of assessment models for children and young people with additional support needs.'

The most common theme to emerge in this section was a call for assessment tools and/or models for children and young people with complex additional support needs to be broaden to cover not only academic achievement but to cover areas of health, wellbeing, happiness, independence/habilitation and communication.

- One respondent said – 'There is a reference to attainment and achievement outcomes for children and young people, but this seems too narrow a focus, and a broader set of measures that include health, happiness and wellbeing would be preferable. In

⁴ <https://beta.gov.scot/publications/supporting-childrens-learning-statutory-guidance-education-additional-support-learning-scotland/>

addition the fact that some young people with complex additional support needs may also be high achievers should be recognised.'

- Another respondent stated – 'SCLD would encourage schools and individuals carrying out assessments to consider some of the complexities regarding assessments of academic ability and progress of children and young people with complex additional support needs. This includes, critiques of IQ based assessments in diagnosing learning disability, as well as challenges around the identification and assessment of gifted students with learning disabilities.'
- Another stated – 'The intention to support the development of models which support the assessment of children and young people with complex additional support needs is welcomed. This should however, include integrated assessment related to the range of children's needs and include eg, factors associated not only with learning, but also communication and physical abilities. The compartmentalisation of assessment negates a holistic view of the child and does not support the connectivity of such elements within the context of children's health and wellbeing.'
- One of the local authority respondents stated – 'Research into formative and summative assessment of progress on all aspects of wellbeing would be helpful. This should take into account the factors that drive residential school places and the impact of a child living away from a family home and community.'

There was a request from a number of rural and/remote local authorities that the trial of assessment models includes children and young people with complex additional support needs living in these communities - 'Really keen to see this work being prioritised and wish to have good information about this at key stages through the trials. This is crucial to ensuring our children are given the best opportunities to achieve the best they can. We request that trialling takes place in rural and remote settings too as there is a number of barriers that have to be overcome to ensure equity for our children and young people living in these communities.'

Another area highlighted by a few respondents was the Child's/Education/Co-ordinated Support Plans. Respondents felt that these should be acknowledged in this section of the strategy as assessment tools. Two respondents highlighted that these plans should support assessment of a child and young person with complex additional support needs and that this should be acknowledged. However, it was also highlighted by a couple of respondents that inconsistency in the use of these plans amongst local authorities and professionals, meant that many feel that these plans are not given proper place/consideration within the assessment process of the child/young person; and that the information contained in the plans is of such a poor quality too almost rendering them useless in the assessment process.

The theme of including/involving children in the process was commented on by one respondent. It is an important point and we wanted to acknowledge and include this in the analysis report – '...with regard to assessments it is also essential to involve children in the process and therefore develop formats which may rely on the use of pictures, sign language or videos for example. It is key to understand and acknowledge that one size does not fit all. Finally it is also crucial to discuss and explain to parents what is being agreed on and documented into the plan.'

Two respondents suggest that the use of technology in the assessment process should also be part of any research/trial and another respondent wants technology and 'assessment arrangements' to be included in any assessment framework.

Some respondents asked that in order to give more context to the work of this section more information on Standardised Assessments should be provided and where relevant any links to improvement of information gathering for this group of children and young people identified. At the time the strategy was developed, we did not have the standardised assessment. Reference to standardised assessment will be included in the updated strategy document.

Finally, a respondent suggested some additional wording. They suggested that it would be helpful to include “and evaluate their effectiveness” at the end of the first bullet point. This would change to:

- Supporting the trialling of a range of assessment models developed specifically to provide frameworks for schools and services to support the assessment process for children and young people with complex additional support needs and evaluate their effectiveness.

Service Improvement

There were 31 responses to this section of the strategy with 29 of those responses supportive of Service Improvement. Many respondents welcomed the focus on collaboration to drive forward Service Improvement. Some of the comments were:

- ‘We welcome the focus on improvement through strengthening internal collaboration between education, care and health staff locally, and wider multiagency local authority partners (education and social work). Multi-agency working is central to GIRFEC, and is receiving significant focus (both locally within GIRFEC implementation teams and nationally, for example in the work of the Children and Young People Improvement Collaborative). There is much for NSCG to build on in this area.’
- ‘We welcome the Strategy’s proposals around Service Improvement and support for the commissioning of action research to identify solutions and models to deliver positive and productive collaboration which will benefit children and young people with complex additional support needs. Again, we hope this research will prove valuable in providing a model which can be applied to deliver positive outcomes more widely for all pupils and young people with learning disabilities.’
- We are really pleased with this focus on partnership as highlighted in previous comments – this again is a foundation approach that we fully endorse but please remember the family carers.’

A number of respondents put forward some suggestions for alternative wording/additions for this section:

- ‘Would be helpful to include collaboration with families as part of the criteria being identified by research.’
- ‘The focus on inter-agency collaboration seems to narrow, and inter-sector collaboration should also be emphasised.’
- ‘Since the whole purpose of the Strategy is service improvement, it would be more appropriate to replace this heading with ‘Partnerships’ or with a similar heading recognising the importance of partnership working to the development and implementation of the Strategy.’
- ‘It is unclear what is meant by “The research to look at both at internal collaboration between education, care and health staff within a localised setting and also the wider local authority scene (Education and Social Work Services).” The work “internal” is confusing when the first refers to a number of bodies (Local Authorities, NHS Boards

and Integrated Joint Boards as well as any third sector agencies providing services) and the second to services within a Local Authority (or Integrated Joint Board).”

Performance Information

28 respondents commented on this section. The majority of the responses fell into two main areas – suggested alternative wording and/or a call for more detail/clarification.

Starting with the suggested alternative wording, the following were put forward:

- One respondent suggested on the last paragraph under Performance Information which reads ‘will by then have become trusted as well informed and authoritative voice leading stakeholders toward a consensus around these aspirations’ that this is changed to ‘will by then have become a trusted, well informed and authoritative voice leading stakeholders toward a consensus around these aspirations.’
- One respondent pointed out that the ‘Care Commission’ should now be referred to as ‘Care Inspectorate’.
- Another respondent suggested ‘improved intelligence information across the profile of complex additional support needs’ should be replaced with ‘improved understanding around the breadth and depth of need in relation to children with complex additional support needs’.
- A local authority respondent suggested re-wording the first sentence to ‘In relation to the key theme of education, care health and the third sector.’
- Another respondent suggested - ‘We urge the Strategy to include in this section that by 2026 the National Strategic Commissioning Group will have demonstrated significant improvement in reducing the attainment gap for all children young people with complex additional support needs’.

The comments relating to a call for more detail/clarification were:

- ‘This section begins with the word ‘this’ without indicating what that means, and the whole first paragraph ought to be expanded to make it clearer what sort of performance information is required, from whom, and for what purpose. Similarly, the second paragraph sets out the wider context but does not make it explicit why the roles of Education Scotland and the Care Commission are highlighted.
- ‘We feel there could be greater clarity about the timescales for results for each of the drivers. While some give a clear statement of what success will look like in 2026, this is missing from others. We would like to see such a statement attached to all of the drivers, as well as information about all the phases for delivery of the Strategy as it is currently planned.
- This section also uses the term ‘these aspirations’ without explaining what the aspirations are. It would be helpful to provide a table or other graphic to show the stages, throughout the life of the strategy, of the development of relevant performance information, and expected outcomes.
- ‘This section could be clearer with respect to what is intended. For example will a specific data suite be compiled or is it more of a developing measurement framework flexible to local contexts?’

Enquire felt more clarity in this section of the strategy would be helpful, and put forward the following suggested change – ‘We suggest this needs to be reworded to be clearer to the reader and suggest: “Proposed areas for any funding will be expected to inform practice and improved intelligence across the profile of complex additional support needs. The content of this strategy is located within the current international and national legislative

frameworks, and national and local authority policies which seek to protect and promote the rights of every child. Education Scotland and the Care Commission have key responsibilities in these areas. By 2026 the National Strategic Commissioning Group will have become trusted as well as informed and an authorities voice leading stakeholders toward a consensus around the strategy’s aspirations”.

Question 8: Do you agree that the Governance arrangements detailed in page 17 are appropriate? If not, what else should be included?

Answer	Total	% of all respondents
Yes	37	60.66%
No	5	8.197%
Don't know	2	3.279%
Not Answered	17	27.87%

Of the 61 respondents who responded to the consultation 37 agreed with the Governance arrangements. It should be noted that around 27% of respondents did not answer this question. It may be that respondents did not have a view on the governance arrangements or it was not felt to be sufficiently of concern to them (perhaps what is to be delivered is of more importance to these respondents).

A few respondents asked for the membership of the National Commissioning Group and the National Strategic Commissioning Project Board. This information is already provided as links within the strategy document on page 8 under the National Strategic Commissioning section.

The majority of the comments were in relation to representation of parents/carers and children and young people on the National Commissioning Group and the National Strategic Commissioning Project Board.

A few respondents raised some concerns about the impartiality of the National Commissioning Group and questioned whether it was appropriate that providers, who were providers of the types of provision that could be commissioned by the group were members of the group and part of the decision making process. One respondent stated – ‘We have some concerns regarding the significant numbers of providers sitting within the commissioning group. While consultation with them during the review was entirely appropriate we would question whether those bidding for contracts should sit within the decision making group of the awarding body. This could be construed as a conflict of interest.’ While another respondent stated – ‘Whilst it was important to include specialist providers in the development of this strategy there would be significant conflict of interest if they were to sit on the commissioning group.’

A recurring theme raised by a few respondents was a timeline and/or chart that shows short, medium and long-term goals of the strategy – ‘The document leaves open many questions that could be addressed by more detailed explanation. For example, the document could use diagrams, tables or flowcharts to make it clear what actions are envisaged, when action should be taken and or completed, who is responsible for each action, and what staging points will be along the way to 2026.’ Another respondent stated – ‘We are broadly satisfied with the Governance arrangements as outlined. However, we would like to see information on how the progress of delivery will be monitored and a firm commitment to regular progress reporting on the Strategy.’

Question 9: In relation to the overall 10 Year Strategy – are there any areas missing, requiring strengthening, or which are not required and could be removed?

Answer	Total	% of all respondents
Yes	38	62.30%
No	9	14.75%
Don't know	2	3.279%
Not Answered	12	19.67%

42 respondents provided comments under this section. The comments were wide ranging and it is not possible to cover all 42 in detail. However, most fell under one of the following themes:

- High level timeline and action plan for implementation
- Monitoring and reporting on progress of the implementation of the strategy
- More detail on the transition period from the historic funding model to strategic commissioning and how this will be managed
- The Education Reform Agenda

The most prominent theme to emerge in this section was that the strategy would benefit from (and be improved by) the addition of a high-level timeline and action plan for implantation. In addition some respondents wanted information on how monitoring and progress reporting of the strategy would be undertaken – ‘the Strategy wold benefit form a greater focus on evaluation, measurement and performance monitoring. We feel the document would be more robust with a clear outline of the Strategy’s objectives, actions to deliver those objective, key performance indicators and timelines for delivery. This clarity and focus may best be achieved by including a table of objectives, actions, KPIs, and timelines within the Strategy.’

A few respondents asked for clarity on the Transition Period section on page 15 of the strategy, pointing out that this needs careful planning and management.

A number of respondents raised the question of the impact that some of the changes under Education Reform may have on this strategy and ask that this is considered and address in the final version of the strategy.

One respondent commented/suggestions that a Child Rights and Wellbeing Impact Assessment (CRWIA) is undertaken on the strategy to assess its impact on the rights and wellbeing of children.

Another respondent suggested that the strategy should be adjusted into an easy read version for parents/carers.

Finally a few respondents acknowledged the work that has gone into the development of the strategy and the previous work undertaken during the Doran Review – ‘This has been a significant and challenging journey and it is a credit to the group leading the developments that such a clear strategy has emerged.’

Question 10: Are there any general comments you would wish to make about ‘Scotland’s Strategy for the Learning Provision for Children and Young People with Complex Additional Support Needs 2017-2026’?

There was a broad mix of responses to this question. Where issues have already been covered earlier in the analysis, they have not been repeated.

The vast majority of respondents welcomed ‘*Scotland’s Ten Year Strategy for the Learning Provision for Children and Young People with Complex Additional Support Needs 2017-2026*’ and saw the need for it. There were comments throughout the consultation requesting clarification and more detail on certain sections of the strategy, which have been highlighted in this analysis report.

There were a few comments about the lack of involvement and participation of parents/carers; and children and young people with complex additional support needs in the development of the strategy document, including the voices and opinions of parents/carers and the children. This has also been recognised in other parts of this report.

There were a few suggestions made across the consultation on the way some of the strategy was worded or set out, as well as suggestions for links to additional material and information sources. There were also requests for the use of Case Studies/Practice Insights to illustrate where good practice is demonstrated and stylistically make the strategy more powerful.

Conclusions

The majority of respondents welcomed ‘*Scotland’s Ten Year Strategy for the Learning Provision for Children and Young People with Complex Additional Support Needs 2017-2026*’.

There was a strong message in the responses that the strategy would benefit from the inclusion of the following:

- A high level timeline and action plan for implementation;
- Detail on how progress in implementing the Strategy would be measured; and
- How this would be reported.

A few respondents wanted to see more work carried out to try to establish a definition of complex additional support needs. As stated in the strategy document due to a multiplicity of factors and the impact of specific contexts in different local authorities, providing a rigorous, clearly bounded and universally accepted definition of complex additional support needs would be difficult. It has potential to result in unforeseen consequences that could have a negative impact on the children and young people this strategy is trying to support. Defining complex additional support needs would undermine the framework that the Additional Support for Learning Act is based upon, that being the need to identify and provide for the individual needs of pupils with additional support needs.

A few responses also highlighted some concerns in the availability of robust data for children and young people with complex additional support needs. All schools and local authorities must ensure that accurate and consistent data on the additional support needs

of their children and young people is captured. This enables schools to maintain a full record of those children and young people with additional support needs and to deliver their statutory responsibilities. Work is already underway to update SEEMiS guidance, which will include definitions of additional support needs in schools; this will be published later in 2018.

In addition, the design of the Scottish National Standardised Assessments (SNSA) has been informed by consultation with key stakeholder groups, including a standing group for additional support needs and accessibility, and rigorous testing of the assessments with children and young people throughout Scotland. Following the programme of consultation and testing, the following provisions were formalised within the SNSA implementation from August 2017:

- No time limitation for completion of assessments;
- SNSA compatibility with adaptive software supporting children and young people with sensory needs i.e. readers, screen resolution adaptability, font sizing and colour contrasting;
- Full ASN Guidance for professionals provided within the assessment platform
- All training programmes provide specific guidance on use of the assessments by children and young people with additional support needs;
- Children and young people have access to the range of supports available during every day learning and teaching activities;
- All questions contained within the SNSA are assured by Education Scotland for cultural and educational relevance to the Scottish context;
- The presentation platform and all questions within the SNSA are assessed by accessibility specialists to ensure each conforms to international accessibility standards;
- During implementation, stakeholder groups continue to be consulted to inform future planning.

In relation to the responses to Question 5 on the 'Scope of the Services to be commissioned', it is noted that the majority of the feedback/comments and suggestions were closely aligned to the findings from *'The Needs Analysis for Strategic Commissioning of Services for Children and Young People with Complex Additional Support Needs'*⁵, which was published in March 2015.

Many respondents in response to Question 5 raised the theme of transition provision. This featured slightly more in the responses to the consultation than it did in the needs analysis.

There was strong support for the strategy's aim of training and development for staff working with children and young people with complex additional support needs. While the majority of respondents welcomed specific Leadership training in the sector of complex additional support needs, many expressed the view that this needs to be done within the context of providing high quality training and development for all staff working in the sector and not just leaders/managers and teachers.

Those supportive of Leadership training wanted more information on how a leadership model would be developed. We will set out further information, in the updated strategy document.

⁵ <https://www.webarchive.org.uk/wayback/archive/20180213002041/http://www.gov.scot/Topics/Education/DoranReview/Workstream2needsanalysis/Needsanalysispaper>

Many respondents highlighted Education Reform and asked that the strategy is reviewed and amended accordingly to ensure that the strategy aligns with any changes under the reform agenda.

A few respondents highlighted that the ten-year strategy was light on detail pertaining to early years. It is our intention as part of the outcome of this consultation to update the ten-year strategy to include links to early years policy and the early years inclusion fund.

Family engagement and the voice of children and young people was a theme raised by a number of respondents. The main conclusion was that the strategy would benefit from strengthening in this area.

We plan to strengthen the strategy with a section that clarifies how we have engaged with families, children and young people so far; and how their input has shaped the recommendations in the original Doran Review and in turn the strategy. Looking forward we will also link the strategy to the work under the Education Reform around parental/family engagement, as well as, the extension of Children's Rights on the 10 January 2018, which extended rights under the Additional Support for Learning Act to children aged 12 to 15.

We will further strengthen this section of the strategy by making links to the three-year national action plan on parental involvement, parental engagement, family learning and learning from home. In particular, we will ensure that parental perspectives in relation to children and young people with complex additional support needs are considered as part of any new statutory guidance and the national action plan.

In relation to Question 8 on the governance arrangements, a few respondents noted some concern that there was a lack of parent/carers and children and young people represented on the National Commissioning Group and the National Strategic Commissioning Project Board. The National Parent Forum Scotland (NPFS) sit on both the National Commissioning Group and the Strategic Commissioning Project Board. The NPFS represents Parents Councils across Scotland and their aim is to 'represent parents in pursuit of maximising every pupils potential'. In relation to children and young people, a member from the Children and Young People's Commissioners Scotland team sits on both the National Commissioning Group and the Strategic Commissioning Project Board – the Commissioner and his team, work to protect the rights of children and young people living in Scotland. In addition, we will review the representation of these groups on the National Commissioning Group and the National Strategic Commissioning Project Board.

Finally, in response to Question 8 a few respondents raised some issues with the membership of the National Commissioning Group and impartiality of the decision making process for commissioning of services because Grant Aided Special Schools are represented on the National Commissioning Group. The principle of strategic commissioning⁶ as a model requires that service users and providers are part of the process. The collaborative partnership approach is a fundamental principle of strategic commissioning.

⁶ <http://www.jitScotland.org.uk/action-areas/commissioning/>

Next Steps

- The Scottish Government and the National Commissioning Group will now consider the content of all the responses received and work will be taken forward in the coming months to take account of these with a view to amending and improving the draft strategy. We are concerned with the area of complex additional support needs within the context of the government's commitment to address the needs of all learners. It is crucial that the final document supports our vision for education in Scotland of delivering both excellence in terms of ensuring children and young people acquire a broad range of skills and capacities at the highest levels, whilst also delivering equity so that every child and young person should thrive and have the best opportunity to succeed, regardless of their additional needs or social circumstances.



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