

PACCs response to the SEND and AP Strategy and Outcomes Framework consultation

Following our face-to-face session exploring the consultation in more detail with Parent Carers, we have compiled our response to the consultation as a community-led organisation. We have laid this out as simply as we can and provided our reasoning for our responses in italics below the questions.

We encourage all Parent Carers to respond as best they can to the consultation as this Strategy and Outcomes Framework will form the foundations of the SEND system for the next 3-5 years. If this does not reflect what families feel they want and need to be prioritised, the system will continue to develop and adjust their approach based on this strategy and framework which may not be suitable if not fully informed.

PACC have highlighted to Shropshire Council that although we have participated in many discussions about the ongoing development of the Outcomes Framework this has not been coproduced. Our contributions in meetings and via email has resulted in some minimal changes being made to the document to date, but we have been clear that the design of the document and the way information is presented also needs to be coproduced and collaborated on with community representatives and system partners. As a community led representative organisation, this is exactly what we have been trying to do. We have published our report [“Shropshire’s Self Evaluation Framework – The other side of the story”](#) and details the feedback we have had from families on issues and priorities across the system which we have then used to inform what we have said to system partners when opportunities have been available to do so.

Consultation Response:

Please note our answers that have been submit are in bold and highlighted yellow. Our reasoning and considerations for this response are in italics.

Overall, how satisfied are you with the draft strategy?

Dissatisfied

Please consider the following statements and select the response that best reflects your opinion.

The vision or aim of the SEND and AP Draft Strategy is well described. **- Agree**

PACC believes the vision and aim remain true to that which was developed in coproduction with the SEND community in 2019 and therefore remains an accurate reflection of what families have said previously they would want to see for their children in the future.

The SEND and AP Draft Strategy outlines the challenges faced and context. **- Disagree**

PACC feels the document could go further in describing the challenges faced by families and how the system will use this strategy to facilitate meaningful change to address these issues effectively and with sustainable outcomes. We feel that had this been coproduced to the extent of the previous strategy document, this would have been more representative of, and reflect more accurately, the experiences and challenges faced by the SEND community.

The way the strategy fits with national and local policies and plans is made clear. **- Disagree**

PACC believes there could be much stronger connections between national statutory requirements and descriptions of local approaches. This would help make it clear to families which laws support their rights to access services and help for their families and which elements are local policies and practices. Currently we are concerned that local policies are being given more weight than statutory legislation and therefore some rights and entitlements are not being delivered.

The strategy sets out partnership working in Shropshire and links to other organisations and services. **- Neither Agree nor Disagree**

The document isn't clear in places about where partnership working will be implemented and how this will make an impact on family's lives. It could go further in describing the accountability pathways to ensure families have confidence in the systems commitments and ability to deliver the strategy.

The strategy clearly describes the progress in Shropshire that has been made to address SEND provision over recent years and includes data to outline the current position. **- Disagree**

While we feel the strategy overall is sufficient in many ways, the detail that is lacking in data, what data is needed, and how this will be collected in the future is a gap. There is reference to data that will support measuring impact and links to data that will help plan for service developments but there is little detail about ensuring SEND data influences the development of non-SEND specific services, such as housing, school commissioning, transport, and Adult Social Care. The strategy is a crucial way to set targets and measures for obtaining the data needed and showing that the system is using this data well to improve the lives of those with SEND.

Priorities are clearly presented. **- Agree**

The priorities are well presented, if lacking some detail. We feel the layout is useful and would like to have seen the Outcomes Framework more connected with the strategy to demonstrate how they are connected.

Is there anything you feel could be improved upon? Please add comments if you are dissatisfied with the draft strategy document overall, or if you selected disagree/strongly disagree for any of the points listed above.

We are frustrated to not see a clear connection between the strategy and the outcomes framework, and the lack of detail in non-educational impacts that are vitally important to family's lives. We are also disappointed that some key elements of the existing coproduced strategy have been redrafted or excluded from this document. We feel more accountabilities could be described and greater recognition of the challenges that family's face could be included.

Is there anything you particularly like about the draft strategy?

The way it is presented is helpful and makes it clear to connect impact expectations and delivery methods to the anticipated outcome.

The strategy sets out how the impacts will be measured. **Strongly Disagree**

As we have already stated, data and measures are not well described and are at times articulated as actions rather than impacts or measures. Some measures need to be refined and much more clear as well as connected to the outcomes families have described as their aspirations.

The timescales and anticipated impacts of each action are clearly explained. **Disagree**

Timescales are not well described, and the importance of maintaining quality over timeliness is not articulated either, which families state is often the more important consideration.

The implementation of the strategy appears to be realistic to achieve. **Disagree**

Implementation is not adequately described to comment on.

Please use the space below if you have any other comments to make about the strategy's impact on people with SEND and Alternative Provision.

Implementation has not been described well enough to comment on. Timescales are not well articulated and the value of maintaining high quality outcomes and support is also

lacking. Measures are not clear and limited to education impact in the main with key social care and health measures being omitted almost entirely.

Overall, how satisfied are you with the Outcomes Framework?

The Outcomes Framework sets out top-level outcomes, broken down to reflect 'what good looks like' in each area, for children and young people, parent carers and partners. Wherever possible or where it makes sense to do so, we will aim to apply a measure to track progress towards these good outcomes.

Please tell us whether you think the strategy as it is currently written addresses the following outcomes?

My voice is heard – **Addressed in part**

This section needs to decide if the “my voice” is about those identified with outcomes or if it is solely about the child / young person. This section also describes outcomes that a Parent Carer would be responsible to deliver. We have said many times that the way these are presented may lead to a culture of parental blame or Parent Carers feeling they are letting their families down if they cannot meet these. Also many of these outcomes are actions and are not measurable.

I am achieving – **not addressed at all**

This section is predominantly focused on education, and fails to address in full the social care, health and wider life outcomes that families are consistently asking to be considered and addressed by the system. These outcomes are considerably lacking in connectivity to person centred practice and the measures we expect to see captured and addressed by the Joint Strategic Needs Analysis the system must produce annually.

I am healthy – **addressed in part**

This section could go further to include outcomes about developing and maintain basic health standards that we see if poorly addressed can lead to poor outcomes and ultimately reducing life expectations.

I am happy – **not addressed at all**

This section again fails to look at wider outcomes and the importance of developing and maintaining relationships. Outcomes in this section could include things like developing housing solutions and social care options that support young people to maintain relationships within the community they are a part of.

I am supported – **addressed in part**

While support needs are addressed with some good outcomes described, this section could go further still with more outcomes focusing on community support, and a clearer description of outcomes that explore assessed social care services. There could also be more health related outcomes in this section.

I feel safe – **addressed in part**

We feel this part can go further with outcomes that focus on the child / young persons understanding of their safety and wellbeing, such as demonstrating awareness of risk or being supported to identify potential concerns. Also this section could explore outcomes related to safe and healthy relationships too.

I am independent – **not addressed at all**

The words ‘talk’ should be replaced with communicate throughout this document as this leads us down the path of non-verbal communicators failing to develop independence as these outcomes are excluding them. Providing information in a way that supports decision making is vitally important and outcomes and measures of this could be more detailed here. Linking outcomes here to person centred care plans and packages of support would also be beneficial. And again the issue of these being outcomes for the child / young person or their support providers is confusing. This needs breaking down even further and more consideration given.

Are there any gaps in the Outcomes Framework or any wording that you would change?

There are huge gaps in the framework with a strong focus on education and limited consideration to health, social care, or wider life outcomes. Using words like talk instead of communicate exclude a huge part of the SEND community. Outcomes and actions are conflated, and some areas confuse outcomes for the child / young person and outcomes for the support provider or care giver. This is confusing and needs to be presented more effectively. We feel that outcomes for Parent Carers, Children and Young People, and system providers or mechanisms are vitally important and should all be included, but the way these are developed and articulated needs further consideration. There are no outcomes that support Parent Carers needs to be identified and met and measured, and there are limited outcomes looking at holistic needs. We are disappointed to say the least that many outcomes families have described in the previous SEND strategy have not been included.

Please use the space below if you have any other comments to make about the strategy’s impact on people with SEND and Alternative Provision.

Overall the strategy and the outcomes framework are disappointing and on the whole a good start but incomplete in many ways. Families deserve holistic and meaningful outcomes with measurable impacts and a strategy that describes how the system will

deliver this while maintain high quality care and support and holding itself accountable when things are not progressing or improving for families.

Families would likely be able to offer greater insight into how this can be achieved if we worked with them to develop this.

Please use the space below for anything else you would like to add.

Overall families have contributed to the conversation around this material for some time, but we fail to see where this has been clearly informed by these discussions and engagements to date. We have repeatedly heard Parent Carers and Families seeking to be involved in decisions about the way services will meet their needs, and this hasn't gone far enough yet to respond to this. There are gaps, inconsistencies, and missed opportunities to make these documents genuinely meaningful. The presentation of the Outcomes Framework needs considerable work, along with its contents. We are also concerned the Quality of Life for children and young people has been poorly addressed in these documents with limited outcomes and indicators described that would lead to an improved quality of life for the SEND community.

Do you have any comments to make about your own needs in relation to the information set out within the SEND and AP Draft Strategy and Outcomes Framework?

Parent Carers needs are completely neglected in these documents. The system already drives Parent Carers towards Parenting classes (which are often inappropriate and create a sense of shame and blame for families) rather than identifying and addressing the needs of family carers in the legally described way and with clear connections across to adult social care and mental / health pathways. We also see limited consideration given to voluntary and community sector partners roles in supporting the delivery of outcomes at a system and individual levels. There is a huge variety of organisations that could support families to meet identified needs in a more meaningful way if they were guided to understand how they can do this.

Summary

PACC are concerned that the outcomes framework is not holistic enough, is narrowly focused on education in many areas, and is disconnected from the strategy document. There are conflation between outcomes and actions that create confusion and disconnect between the accountability and measures of delivery. The overall approach to the development of this has been uncharacteristically difficult and has resulted in a poorly produced document that we feel is not representational of the SEND communities' needs and aspirations.

The strategy while overall a useful and well considered document still has large gaps and requires more definition of whole life outcomes, impacts, and deliverables.

Consultation Response

We have been disappointed by the response when we have raised these concerns and hope that families feedback will reiterate the importance of working together from the start and genuinely hearing (not just listening to) the voices of the SEND community.

