

## Camden Learning response to the SEND Reform and Schools White Paper Consultations

Camden Learning, a partnership of 57 schools, responds below to three Government consultations relating to the Schools White Paper:

1. SEND Reform
2. 16-19 Level 1 English and Maths Qualifications
3. Key Stage 4 Performance Measures and Targeted RISE Extension.

### 1. Camden Learning response to the SEND reform consultation:

Consultation Questions	Camden Learning Response
<p>1. We want children, young people and their families to be involved in making better, evidence-based decisions about SEND, both in their local area and across the country. How can we make sure children, young people and their families have a genuine say in these decisions?</p>	<ul style="list-style-type: none"> <li>● Local <b>SEND parent forums</b> provide a structured channel for parent representation and co-production on partnerships.</li> <li>● Communication between parents and schools works when it is a <b>continuous, ongoing relationship</b>, not a one-off ‘consultation’.</li> <li>● <b>Clarity, consistency, and simplicity</b> in processes are critical e.g. on using processes such as ISPs, EHCPs, and the proposed Specialist Provision Packages.</li> <li>● Acknowledgement that good communication between families and schools can be <b>resource-intensive</b>, particularly in helping families through the process of accepting diagnoses and acknowledging long term disabilities and needs.</li> <li>● <b>Parental choice of provision</b> is often under-informed, and support is needed to navigate the emotional journey that can be involved with SEND provision. <b>A national myth-busting approach and celebration of specialist as well as mainstream provision</b> would help, and acknowledgement in the system of how much 1:1 support parents need.</li> <li>● <b>Listen to parental views on the variety of specialist provision needed across a larger geographical area</b> and that has tended to be pushed into the independent sector. This includes the important role of specialist <b>schools for deaf children</b> - and how their needs are catered for under the new layers - noting trends towards closure of deaf specialist schools.</li> <li>● Schools already showcase excellent working and close relationships with parents but face <b>real challenges in releasing system funding at sufficient pace and scale</b>.</li> </ul>
<p>2. How can we make sure that high-quality evidence and best practice inform decisions about SEND? Please share examples.</p>	<ul style="list-style-type: none"> <li>● Decision-making and practice should be <b>research-led</b> and underpinned by substantial evidence to <b>avoid ‘flavour of the month’</b> approaches and models which fail to deliver.</li> <li>● <b>EEF work</b> in this area is valuable in schools, where the toolkits and audits for SEND support impactful practice and review - but this and other work needs to <b>keep pace with the increasing level of needs in schools</b> as this is changing and increasing so quickly.</li> <li>● Research and building of evidence should identify where <b>consistency and mapping</b> can decrease variability between schools, as such variability is a barrier to the reforms envisaged. It should also, however, recognise where best practice may differ depending on local contexts.</li> <li>● Schools and area-based partnerships are well-placed to inform best practice and <b>Camden Learning</b> would be keen to support development of evidence-based packages via <b>piloting and testing or other involvement</b>.</li> <li>● Dissemination of models and good practice needs to acknowledge that <b>the vision and ethos of the school and partners influence the approach to SEND</b>, and effective provision has a ‘can-do’ problem solving approach to SEND. Good practice models need to be able to be assimilated into school approaches.</li> <li>● Turning research and advice into effective <b>whole-school and classroom practice</b> requires expertise. The Expert at Hand service should include support for specialist SEND advisory teacher roles to be established to support schools to implement inclusive in-school practice.</li> </ul>
<p>3. How can we ensure that children are best supported by the Universal offer?</p>	<p>We welcome the aim to <b>strengthen universal provision</b> to enable an inclusive mainstream system. Strengthening the Universal offer depends on:</p> <ul style="list-style-type: none"> <li>● Investment in this offer, e.g. where settings have the space to build new sensory or breakout areas, these carry <b>ongoing resourcing implications</b> including for staffing.</li> <li>● <b>Strong sharing of evidence &amp; practice in catering for an increasing diversity of needs</b> - e.g. by building support such as visual timetables in every classroom, avoiding an over-stimulating environment etc.</li> </ul>

	<ul style="list-style-type: none"> <li>● Acknowledgement that <b>high-quality teaching is a key driver</b> along with <b>early needs identification</b> so there is clarity about support required across different subject areas.</li> <li>● <b>Early roll out of staff training resources including high-quality ITT resources, and support with training delivery</b> including extra INSET day on inclusion. E.g. not just guidance, and including <b>training on how to deploy additional staff and specialists in the classroom.</b></li> <li>● <b>Provision mapping</b> across school partnerships with clear processes &amp; shared information</li> <li>● <b>SEND built into all training paths for all teachers and TAs/LSAs</b> so it is fundamental to all practice and not an add-on. There needs to be a real focus on <b>pedagogy and adaptive teaching</b> which can be lacking in current training offers, for example in the PGCE route.</li> <li>● <b>Developing universal provision</b> should be linked to wider school improvement expectations and aligned with curriculum reforms to ensure alignment in wider policy development.</li> </ul>
<p>4. How can we ensure that children in the Targeted layer, are best supported?</p>	<ul style="list-style-type: none"> <li>● <b>Sharing expertise across settings</b> is very important for this layer of need but requires that Additionally Resourced Provision (school-based units) and other specialist provisions are funded to play this outreach role. The role of agencies is also important in feeding into ISPs and being in contact with parents.</li> <li>● <b>Sufficient funding and workforce planning</b> for medical and other specialist support is vital for this layer of need so that there are enough expert professionals to keep children within this layer otherwise they will tend to rise to Targeted plus. We have substantial concerns that the supply of experts will not be sufficient to meet demand and to ensure faster access where required - this supply and rapid access to it will be key to delivering on the Experts at Hand reform elements.</li> <li>● <b>In secondary schools, target groups may differ between subjects</b> and the nature of adaptation is different between subjects too. Strengthened evidence on how to do adaptive teaching across different subject areas can inform how, through universal inclusive offers, needs and how to meet these are well-understood.</li> </ul>
<p>5. How can we ensure that children in the Targeted Plus layer, are best supported?</p>	<ul style="list-style-type: none"> <li>● Many young people have a variety of complex needs (e.g. not ASD OR SEMH but both) so <b>provision needs to reflect this complexity</b> - our parents and providers both see the gaps in provision but are not able to find suitable provision or fill the gaps.</li> <li>● More <b>focus on effective transition between phases</b>: a mainstream primary supporting a child with higher level needs effectively may be very aware provision at a mainstream secondary is unlikely to work but the system too often lets the child transition and the provision not deliver.</li> <li>● Incentivise schools to take pupils in this category where possible, noting the substantial resourcing needed to succeed at this level of need. Borough-wide collegiate approaches to how needs are distributed are important.</li> <li>● <b>The right suite of qualifications for Key Stage 4</b> for pupils at this level of need: as currently some are entered inappropriately for GCSEs because there is no other option.</li> <li>● We welcome the aim for a reduced reliance on EHCPs to access more specialist support - but it will be important for the Government to help communicate to parents how new layers will provide effective SEND and specialist support without necessarily requiring EHCPs, to build confidence in the new system.</li> <li>● The Expert at Hand approach should include access to specialist advisory teachers to support schools in implementing effective inclusive classroom practice.</li> <li>● As with all layers, clear, consistent defining of the layers will support engagement.</li> </ul>
<p>6. How can we ensure that children in the Specialist layer are best supported?</p>	<ul style="list-style-type: none"> <li>● We support the overall <b>reform intention to get the right support to children and young people more quickly</b>, but this will require substantial increases in system resources to deliver - including ongoing and ideally consistent specialists being in place for a young person wherever needed.</li> <li>● Where EHCPs are required, currently <b>EHCP funding often fails to reflect the real costs of providing for those pupils</b> in mainstream schools in a way that does not impact negatively on other students. This tends to draw resources away from the other layers of support.</li> <li>● <b>Sufficient funding of specialist placements</b> for those students who will continue to require these will also remain critical. This is noting the severe existing pressures on these specialist places - in Camden demand exceeds supply - combined with the additional role that the reforms propose around outreach and expertise from specialist settings</li> <li>● <b>Resourcing to retain high-quality support</b> such as teaching assistants across all settings are also key - and on support services for staff.</li> </ul>
<p>7. How do you think early years settings, schools, and college can best support the mental health and wellbeing of children and young people?</p>	<ul style="list-style-type: none"> <li>● Accessing expertise (e.g. CAMHS) related to rising social, emotional, and mental health needs is challenging and so investing in sufficient supply and access to this support will be critical</li> <li>● The <b>interface with children's social care</b> is vital here since schools find that so many pupils presenting with mental health problems face complex factors influenced by home lives. Many children's problems are linked to parents' mental health or lifestyle issues not being addressed and where Family Hubs can play a key role</li> </ul>

	<ul style="list-style-type: none"> <li>● It is important to <b>promote and teach resilience</b> as a fundamental part of personal development in schools. Teaching <b>self-regulation, resilience, and having a broad and enriched curriculum</b> that gives access to reading, music and other activities is a vital part of the universal offer to children in support of overall mental health and wellbeing. This could include further embedding principles from approaches like CBT in the PHSE/RSE curriculum. We strongly support the White Paper's intention to support a broad view of education.</li> <li>● <b>Given resourcing challenges, mainstream secondary schools can find it difficult to adapt</b> to pupils who (for example) need large periods of physical activity or particular working conditions.</li> </ul>
8. Do you agree that the refreshed 'areas of development' will support educators to understand and address barriers to learning and participation? Please explain your answer.	<ul style="list-style-type: none"> <li>● There is benefit in having a <b>clear language that avoids the language of diagnosis and disorder.</b></li> </ul>
9. What arrangements would best support effective joint working between early years providers, Best Start Family Hubs, health, local authorities, and parents for children with SEND in the early years?	<ul style="list-style-type: none"> <li>● <b>Recognising and funding the key role of early years</b> settings will be crucial to support the welcome focus of the reforms on early identification and provision to children.</li> <li>● <b>Genuine multi-agency working</b> is key to delivering these reforms, supported by <b>clear accountability across education, health and social care.</b> Across agencies, <b>clear responsibilities and overall leads</b> for a given student can support joint working.</li> <li>● For each child with high levels of need, ensuring there is a <b>team that sits around the child</b> to support transitions including reception into KS1 would have real impact, if supported with sufficient investment.</li> <li>● <b>Best Start Family Hubs</b> can play a key join-up role and in understanding and supporting parental needs early on; the practical impact of Hubs should be closed monitored and iterated.</li> <li>● <b>Drawing on examples of good practice</b> happening through regional partnerships can also inform models of joint working. For example, the Camden SEND Hub supports a collaborative professional learning network for SEND and inclusion leads across 20 Camden schools. It includes research-informed training, observations, and sharing of tools and resources (see more at: <a href="https://camdenlearning.org.uk/learning-hub/send-hub">https://camdenlearning.org.uk/learning-hub/send-hub</a>).</li> </ul>
11. What should the top three priority areas be for building and sharing evidence within the National Inclusion Standards?	<ul style="list-style-type: none"> <li>● <b>High quality teaching and adaptation</b> - both in terms of research and training. Teaching staff need to be very clear on their responsibility for meeting needs in the classroom.</li> <li>● <b>The evidence base needs to include the student voice</b> and have a focus on outcomes and belonging.</li> <li>● <b>Operational and workload considerations</b> are vital - streamlining of administrative tasks not increasing them and with implementation strategies that also considers workload (alongside changes around CAR; Ofsted; and the wider White Paper).</li> <li>● <b>These Standards should remain aligned and integrated with Ofsted processes.</b></li> </ul>
12. What are the most important issues for national training to cover, to help support children and young people with SEND?	<ul style="list-style-type: none"> <li>● <b>Early sharing of a robust training package</b> on inclusion is important to enable the reforms.</li> <li>● This training should avoid 'one size fits all' materials by being <b>adaptable to local context.</b></li> <li>● <b>Content should be layered</b> to include foundational learning; more advanced training for practitioners with a strong foundation; and training for specific inclusion roles including support staff and key service roles in the wider local system.</li> <li>● <b>Teaching children with SEND within the mainstream class should be a core focus, e.g.</b> without resorting to removal from class, and effective ways of working between teachers and teaching assistants.</li> <li>● <b>There should be national training to ensure national consistency in thresholds and banding</b> - the moving away from the current 'postcode lottery' would enable families to be clearer about expectations.</li> </ul>
13. What practical actions can help teachers, educators and leaders manage workload whilst implementing these changes?	<ul style="list-style-type: none"> <li>● <b>Clear guidance and training</b> as early as possible - given the lead times for effective school planning, recruitment, and investment - supported by an additional INSET day for inclusion.</li> <li>● Monitoring if reforms will <b>reduce vs maintain vs increase bureaucracy</b>, in practice, for school leaders, teachers, and SENCOs. The proposed new planning and reporting requirements risk <i>worsening</i> current bureaucracy - these should be streamlined and integrated with wider processes rather than additive. The system must introduce greater clarity, consistency, and simplicity in processes and <b>avoid repetition of tasks/plans/assessments.</b></li> <li>● We support a more strategic SENCO role: to deliver this, schools need to be able to <b>afford to have a SENCO who is out of class and to develop SEND capacity in the school's senior leadership team.</b></li> <li>● Where there will be new responsibilities for system coordination including with the health system - impacts on school leader capacity need to be considered and invested in.</li> </ul>

	<ul style="list-style-type: none"> <li>● Schools would welcome model <b>strategies, action plans, policies, and relevant case studies</b></li> <li>● Be very clear in guidance to parents on how to effectively feed-in views and engage on concerns - to avoid schools incurring additional workload <b>dealing with, for example, complex complaints</b> raised through multiple parallel channels.</li> <li>● The new arrangements should <b>utilise existing area-based schools partnerships like Camden Learning</b> as a sense of place and belonging is very important to the reforms.</li> </ul>
<p>14. How should the Special Educational Needs Coordinator (SENCO) role evolve to better meet the needs of children and young people with SEND?</p>	<ul style="list-style-type: none"> <li>● We support the intention for a <b>SENCO role freed up to be more strategic</b>. Currently SENCOs typically have to spend many hours a week on the admin of applying for and managing EHCPs and on wider paperwork which has a high amount of duplication. The role should be focused much more on individual pupils and practice in the classroom and school - so support is needed to <b>shift the role to being a strategic leader</b> with a role in the quality of education across the school.</li> <li>● Whilst we support the intention of the SENCO role shifting to become more strategic, we are concerned that elements of the reforms - including new reporting elements such as School Inclusion Strategies - risk worsening <b>capacity issues</b> in practice, without careful design and sufficient resourcing of the reforms. Part of this is integrating rather than adding reporting approaches with existing processes, including Ofsted.</li> <li>● Schools need to be able to <b>afford to have a SENCO who is out of class and to develop SEND capacity and expertise across the school's senior leadership team</b>.</li> <li>● If there are to be relatively fewer EHCPs, <b>SENCOs will have even greater pressure in working with parents including managing expectations</b>. They are even more in the 'hot seat' and need time to build relationships and trust with parents. Building up the role of Family Hubs to work with parents and across the system can support this, to ensure parents have the right support navigating the system.</li> </ul>
<p>15. What would provide assurance for families that an Individual Support Plan (ISP) is high-quality and contains the essential information?</p>	<ul style="list-style-type: none"> <li>● <b>Clear and consistent</b> approaches to ISPs (as with the other proposed key planning documents) will be critical to supporting wider clarity, consistency, and simplicity of the new process. <b>ISPs should be concise and outcome-focused, come to in collaboration</b>, in simple language that is shared, and with more consistent professional involvement in creating plans</li> <li>● ISPs should build on existing school-led mechanisms/approaches such as IEPs</li> <li>● There needs to be a way of <b>planning and showing progress</b> (especially when the increments are small) that is clear to parents and helps them understand any potential ceilings on learning, with chances to feed in views.</li> </ul>
<p>16. How can we ensure Individual Support Plans are clear, concise and practical for professionals to use?</p>	<p>There should be:</p> <ul style="list-style-type: none"> <li>● <b>A standard digital format and language</b> used across the country, on core elements.</li> <li>● <b>Standardised evidence-based interventions and consistency</b>.</li> <li>● <b>Limited number of targets</b>.</li> <li>● <b>Easy pre and post intervention progress measurements</b>.</li> <li>● <b>Simple language used throughout</b>.</li> <li>● <b>Clear communications on the purpose and the development/monitoring processes for ISPs</b>.</li> <li>● <b>Consideration of how ISPs fit into wider processes and products to support an overall simple, clear system</b>.</li> </ul>
<p>17. How can we best support transition for young people with SEND, so that they are well supported into post-16 provision and further education, training or employment?</p>	<p>Post-16 transition for students with SEND will benefit from further focus as reforms develop - as part of this:</p> <ul style="list-style-type: none"> <li>● There needs to be a <b>qualifications regime</b> which enables the ~10% who fail under the current GCSE system to have achievements that are tracked and recognised.</li> <li>● <b>Clear provision mapping</b> helps to support transitions: sharing of best practice can support how post-16 institutions communicate which student needs can be met in terms of expertise and environment, rather than only the qualifications offered. Currently, it can often be hard to identify suitable provision for pupils with higher-level needs.</li> <li>● Pupils need <b>SEND careers support</b> throughout their schooling so that they receive signposting specific to their needs.</li> <li>● <b>Parents need assistance and support</b> to engage on decisions as it can be difficult to make a change at age 16, even if that is the best option for the student because of anxieties e.g. about travelling.</li> </ul>
<p>18. How can we make sure that every area can meet the full range of the needs of children and young people through Inclusion Bases?</p>	<ul style="list-style-type: none"> <li>● <b>Some schools are short on physical space in inner city locations, listed buildings etc</b> and it will be highly unfortunate if rooms previously used for other activities - such as peripatetic music lessons - get taken up as inclusion bases thereby reducing opportunities for all pupils.</li> <li>● Where spaces can be appropriately repurposed, <b>the full ongoing costs should be resourced</b>. There is a cost to the initial conversion of spaces and set up, but also ongoing revenue costs to staffing so that suitable staffing complements are still achieved across the school. Inclusion</li> </ul>

	<p>bases can be a good way to manage inclusion but not necessarily a ‘cheap option’ and funding should account for the ongoing staffing costs of additional inclusion bases/areas.</p> <ul style="list-style-type: none"> <li>● <b>SEND pupils placed in a mainstream school can have very diverse needs.</b> SEND is a very wide umbrella term. Some children need to be able to ‘let off steam’ while others require quiet (for example). There are therefore timetable logistics and practical difficulties which mean that Inclusion Bases are not a panacea.</li> <li>● Inclusion bases must be positive facilities with excellent, highly skilled staff delivering quality teaching and support to pupils, not merely a means to get children out of the classroom into a ‘place of safety’.</li> </ul>
<p>19. How can we make sure that Inclusion Bases help children and young people succeed in mainstream settings?</p>	<ul style="list-style-type: none"> <li>● It is vital to build up the right <b>staffing expertise</b> across both the mainstream and the base. A school will usually require external advice and expertise. In Camden Learning, we provide advice and support to schools as part of our school-led partnership - including shared guidance and regularly-updated CPD packages. <b>As an example</b>, this includes Camden’s ‘test and learn’ work - as part of our Local Inclusion Support Offer, and involving participation in the DfE’s SEND and AP Change Programme - which connects SEND advisers with school staff through a ‘Team Around the School’ model; this provides structured support to schools with the highest SEND pressures to increase capacity and capability around inclusion, spanning themes such as SEND assessments and adaptative teaching.</li> <li>● The costs of set up and revenue costs need to be funded - this is not a cheap alternative.</li> <li>● Inclusion base provision needs to have a focus on intervention and support, with progress towards independence and successful outcomes.</li> <li>● It is important to ensure that <b>Inclusion Bases are not areas of internal exclusion</b>. It is also important that children accessing the base do not have their curriculum/ opportunities narrowed.</li> </ul>
<p>20. Through the Experts at Hand offer, we want to ensure that mainstream settings can get quick specialist support for children and young people. What arrangements are needed between local area partners (education, health, social care) to deliver this Experts at Hand offer effectively?</p>	<ul style="list-style-type: none"> <li>● <b>Quick specialist support is a major need.</b> A key concern on the reforms is whether the funding/supply set out in the White Paper is sufficient given the sometimes-years-long wait for expert support. Several services (e.g. Occupational Therapists) have acute supply issues which need to be fully addressed.</li> <li>● Ensuring an <b>effective system of referral and shared information</b> so there is not separate administration and form-filling needed for each professional area.</li> <li>● <b>Sufficient admin support</b> so they can respond to referrals in a timely manner - currently a key cause of delays.</li> <li>● <b>Clarity and agreement on thresholds for accessing specialist support</b> and training.</li> <li>● Some form of <b>local accountability</b> is vital, e.g. where a service is failing to deliver and has built up a huge waiting list. There should be mechanisms for intervention and clear accountabilities. Local areas should monitor how allocation mechanisms are worsening delays, such as allocating blocks of specialist time to schools.</li> <li>● Experts at Hand should also support <b>school improvement work</b> on universal offers so inclusive mainstream provision for all children benefits from expertise.</li> <li>● Invest in <b>local expert-informed collaborations</b>. These have supported Camden to being ranked 6<sup>th</sup> in England for Year 1 phonics results, with partnerships including the Kids Talk initiative supporting communication, speech and language up to age 5, and our Every Child Reading by 7 initiative supporting borough-wide training in reading.</li> </ul>
<p>21. What needs to be in place so that children and young people with low incidence, highly complex needs can always access the right specialist placement?</p>	<ul style="list-style-type: none"> <li>● There needs to be some <b>sub-regional planning</b> to ensure that there is provision for highly complex needs so that there is reduced dependence on the independent sector, and clear communications to parents on the viable options in the local system.</li> </ul>
<p>22. How can Specialist Provision Packages be designed to effectively support the main types of need we currently recognise?</p>	<ul style="list-style-type: none"> <li>● <b>Specialist provision packages should be tailored to both the child and the setting</b>, not prepared in a formulaic fashion. This means that ‘experts’ need to design them in partnership with the school and parents, so that they are tailored to the setting as well as the child. Anyone designing a package should understand where the child will be spending their time and what is reasonably possible.</li> </ul>
<p>23. We propose that EHCPs will guarantee educational provision set out in a Specialist Provision Package, with day-to-day provision captured in Individual Support Plans. What is needed to make these proposals work effectively?</p>	<ul style="list-style-type: none"> <li>● Greater <b>clarity, consistency, and simplicity</b> is needed around EHCPs. Currently there are <b>burdensome and lengthy processes for creating and updating EHCPs</b> and there is a need to refocus time on responding to the needs of the child.</li> <li>● However, whilst we support the intentions to reform how EHCPs are developed, schools also fear that there will be <b>potential additional paperwork in the proposed overall new process</b>, due to the further layers of support plans. It is vital that the amount of bureaucracy and form-filling is reduced and not increased.</li> </ul>

	<ul style="list-style-type: none"> <li>● <b>Close monitoring and piloting is needed</b> of whether the design and delivery of these new layers is likely to increase, maintain, or reduce the current level of bureaucracy - and ultimately focus on assuring outcomes, rather than on the paperwork itself.</li> </ul>
24. We propose creating a more direct route to Specialist Provision Packages and EHCP assessments for children under 5 with complex needs. How can we make sure this works in practice?	<ul style="list-style-type: none"> <li>● <b>Increasing early identification and early intervention</b> is key to the success of these proposals overall.</li> <li>● Some parents do not take advantage of nursery provision and so do not get onto the radar of educational services until statutory school age, causing huge challenges for schools and disadvantaging the child. It is important to explore whether there can be a process whereby any contact with public services can trigger early referrals and assessments, including clear roles and responsibilities for the health service.</li> </ul>
25. What would you expect to be considered as part of the needs assessment, for example evidence and expert or professional input?	<p>Considerations would include:</p> <ul style="list-style-type: none"> <li>● Reports from professionals who need to see the child in a school and home setting</li> <li>● Observations from teaching staff and parents</li> <li>● Assessment data.</li> </ul>
26. What factors should LAs take into account in proposing to parents and young people a list of potential settings to name on a plan?	<ul style="list-style-type: none"> <li>● LAs need a <b>sophisticated knowledge of the capacity of provision available at each setting</b>, so that they are proposing settings to parents which will be positioned to take their child</li> <li>● In considering the SEND needs of each student, <b>LAs should also consider the broader support needs and context</b> for the child (e.g. including family contexts), and how the local system including Family Hubs will collectively meet these needs. This support should be clearly mapped and communicated to parents/carers.</li> <li>● Many primary schools find that the most challenging part of inclusion is supporting the concerns and expectations of parents. Could there be wider messaging to parents that better manage expectations around constraints in accessing preferred settings? These constraints create real challenges, some of which will be unavoidable, as preferred settings will not always be available.</li> </ul>
27. What information and support do parents need to make a decision about which setting will be best for their child?	<ul style="list-style-type: none"> <li>● Parents need <b>clarity in the diagnosis</b>: clearly understanding the assessment of educational needs</li> <li>● Once a school is proposed which has the potential to offer a place, <b>it is vital that parents visit the school</b>, with an expert advisor if possible or necessary, to meet staff and look at the facilities and understand the school's ethos and approach. As part of this, it is vital that case officers and LAs also have a detailed knowledge of the school throughout this process.</li> </ul>
28. What do you think is the right maximum length of time for a temporary placement in Alternative Provision (AP) schools? Please explain your rationale.	<ul style="list-style-type: none"> <li>● <b>This should ultimately be case-by-case for as long as a pupil needs a placement</b> - and recognising the <b>ongoing vital role of long-term specialist placements</b>: <ul style="list-style-type: none"> <li>● 12-week placements with re-integration planned as part of this may be right for many students.</li> <li>● However, there should be potential for longer placements - for example of up to a year - where the need is clearly required. This may be specific to complex cases of SEND need, behaviour concern, attendance issues, and family vulnerability - these impact success to greater or lesser extent</li> <li>● A shorter placement may also work for a very specific intervention that cannot be supported within mainstream.</li> </ul> </li> <li>● <b>AP support in Inclusion bases may support a reduction in temporary placement time</b> - e.g. reintegration is through the inclusion base but with AP staff support/outreach.</li> </ul>
29. We have set out our plans to regulate Independent Special Schools (ISS) sector. Do you agree that these proposed changes will lead to suitable placements being available at a fair cost? Please explain why.	<ul style="list-style-type: none"> <li>● Consistent regulation of settings is welcome. A wider point is ensuring that state specialist provision including management of EHCPs is fully funded.</li> </ul>
30. How should settings be held accountable for how they spend their Inclusive Mainstream funding?	<ul style="list-style-type: none"> <li>● <b>Accountability should be integrated with existing accountability frameworks</b> rather than additive. E.g. through a focus on pupil outcomes, and integrated with Ofsted and local commission SLAs</li> <li>● There need to be <b>transparent spending expectations</b> - particularly with Experts at Hand. Being very clear on how much inclusion funding a school is receiving, and the severe pressures on this funding.</li> <li>● Avoid 'unfunded expectations' - intervention comes at a cost to schools, if there is not an adequate fund the interventions on an ongoing basis, they will not succeed</li> <li>● As part of ensuring an effective accountability framework, strengthened support and guidance is needed around handling complex complaints. The proposed increased responsibilities on</li> </ul>

	<p>schools for mainstream inclusion will likely only further increase the scale of complex complaints that schools are receiving.</p>
<p>31. Do you agree that more SEND funding should sit directly within mainstream budgets? Please explain why.</p>	<p>A key question will be <b>seeing the scale of the additional funding each school will receive in practice, versus funding levels currently received, and how this aligns with the proposed expansion of responsibilities.</b></p> <p>We <b>agree that more SEND funding should sit within mainstream budgets</b> because:</p> <ul style="list-style-type: none"> <li>• Investing in mainstream capacity improves outcomes and reduces long-term system pressure - early intervention will be better and ultimately avoid later EHCPs where successful.</li> <li>• Identification of SEND is school dependent and therefore currently not equitable - how we support this to develop will support students and parents.</li> <li>• This approach to funding promotes inclusive practice - schools having the resourcing to support universal offers for all learners and for early intervention - but <b>sitting alongside sufficient funding of specialist provision and places.</b></li> <li>• It will build expertise within the school and more opportunity to share experts through greater autonomy.</li> </ul> <p>Delivering this in a way that supports collective purchasing power will be important.</p>
<p>32. In relation to pooled funding, we propose that every school becomes part of a local SEND group. Do you agree that this proposal aligns with our aim for all schools to be part of high-quality, community-based trusts?</p>	<ul style="list-style-type: none"> <li>• A key principle of the new system should be that <b>schools and local areas maintain flexibility and autonomy</b> in the specific school partnership models pursued.</li> <li>• We support collaboration and partnership as key principles of the new system and at the heart of Camden's principles.</li> <li>• However, <b>schools have specific contexts, structures and cohorts</b> which do not always apply to other schools, so pooling of funding requires careful design, piloting and monitoring - to avoid unintended consequences of disadvantaging groups of students. This ties back to Q31, on how resourcing will be directly moved into school budgets in line with the needs the school is catering for. Pooling on shared coordination/functions could play a helpful role.</li> <li>• In Camden, due to the existence of an area-based partnership, schools work together in partnership, with trusting relationships where schools hold each other to account, for example for being inclusive. A more school-led approach to SEND where schools work together and where most funding is in schools will require regions to continue building such partnerships; we are building on strong foundations, and <b>want to develop existing partnerships rather than build entirely new and parallel structures.</b></li> <li>• For the local groupings of schools envisaged in these proposals, <b>these groups would need to be resourced</b> - the running of them cannot be on top of the day job for headteachers or SENCOs - they need capacity to drive them forward.</li> </ul>
<p>33. How should disagreements about membership, provision, or funding in groups of schools for SEND be resolved?</p>	<ul style="list-style-type: none"> <li>• <b>Greater clarity is needed on the proposals for local SEND groups</b>, to understand the right balance between shared national standards vs autonomy which these groups should involve.</li> <li>• <b>Schools should initially at least, be given the chance to opt in to a grouping.</b> These groupings will likely benefit from shared terms and clear roles and responsibilities - but groupings should be afforded autonomy in how they share and collaborate on areas like training and best practice.</li> <li>• <b>These grouping should draw-on the networks and expertise of existing school partnerships</b> with local knowledge, like Camden Learning.</li> <li>• On the question of funding: in the first place there should be sufficient funding directly allocated to schools and specialist providers in line with needs, as part of the core funding process. Pooled funding for core provision should be explored especially carefully, including whether the pooled funding areas receive should be linked to the relative level of SEND need in the area. For pooled funding, there would need to be clear mechanisms for dispute resolution.</li> </ul>
<p>34. How can we ensure the most effective use of these local partnership groups?</p>	<ul style="list-style-type: none"> <li>• To become a key part of the new system, local partnership groups would need to be <b>resourced effectively</b>, perhaps through part-time secondment of local professionals, to run effectively and to deliver. There is a risk that individuals such as school leaders gain further system coordination responsibilities without consideration of the additional capacity and resourcing required.</li> <li>• If the right level of funding is directly allocated to school budgets initially, this will make the work of local partnerships easier. An overall focus should be on <b>clear roles and responsibilities</b>, core funding which sufficiently supports those responsibilities, and local groups supporting areas such as dialogue, collaboration, and training - building on the work of existing area-based partnerships.</li> </ul>
<p>35. Which stakeholders are important for the success of local partnership groups, and why?</p>	<ul style="list-style-type: none"> <li>• Headteachers and governors will need to be well informed and onboard in the first place given their key roles, and due to the complexities of SEND structures and funding, and SENCOs will also be key to shaping plans.</li> <li>• AP leaders, the LA, and professional partners such as health are key.</li> </ul>

	<ul style="list-style-type: none"> <li>● Parents need visibility in this process through the SEND Parents Forum</li> <li>● Potential support around chairing role for these groups.</li> </ul>
36. How can we build stronger collaboration and a culture of improvement through local SEND strategic plans?	<ul style="list-style-type: none"> <li>● Allow <b>sufficient time for local SEND plans to be developed</b> through open dialogue - informed by early and clear guidance and expectations on details of the national reforms as these develop.</li> <li>● Design systems which ensure those involved in coordination and placements are <b>familiar with each school</b>.</li> <li>● Ensure local partners are clear on and bought-into their <b>roles and accountabilities</b>.</li> <li>● Plans should consider how <b>admissions processes</b>, and <b>transition practices</b>, are supporting children and young people with SEND to move between settings in a beneficial and well-planned way - learning from best practice examples which include strong partnerships and processes between schools on transitions.</li> </ul>
37. What information, advice and guidance can best support children, young people and their families to ensure greater fairness across the system?	<ul style="list-style-type: none"> <li>● As mentioned elsewhere, <b>clear and ongoing support and guidance</b> is needed to parents, children and young people on SEND processes, the assessments of professionals, and the viable options for settings.</li> <li>● Strengthening the <b>clarity, simplicity and consistency</b> of the processes should also happen alongside ongoing strong support for resourcing of provision such as SENDIASS and of local collaboration building.</li> </ul>
38. Do you agree that a SEND specialist (e.g. a SENCO) should sit on the school complaint panel, when the complaint relates to SEND support and provision? Please explain why.	<ul style="list-style-type: none"> <li>● We <b>agree</b> that a SEND specialist should sit on the school complaint panel when the complaint substantially relates to SEND support and provision - supported by <b>clear best practice guidance on where this applies</b>.</li> <li>● The expertise they bring to the provision of support and intervention is often crucial. A SEND diagnosis or an assessment has specific areas of intervention and reasonable adjustment or expectations of provision. Complaints are often asking for provision outside of this or relating matters that are not SEND-related to the student and school. This detail often needs to be unpicked.</li> <li>● Conversely if there is a SEND need not being met and provision that falls below the expectations of the need, this is again a judgement that needs expertise.</li> <li>● There should also be a focus on SEND expertise feeding into earlier resolving of complaints before they reach panels - and in all governors feeling supported to engage with SEND-related complaints.</li> </ul>
39. This consultation outlines a series of measures intended to reform the SEND system. Some of these measures have already been finalised, and this is clearly indicated within the document. With this in mind, is there anything further you would like to contribute to help inform the remaining proposals that are still under consideration?	<ul style="list-style-type: none"> <li>● The overall intentions of these proposals are welcome in supporting an inclusive mainstream system, addressing challenges and pressures in the system currently. However, the proposals will need to be carefully designed and monitored as they are developed, trialled, and implemented, to ensure <b>clear roles and responsibilities, sufficient funding</b> to meet these responsibilities, and an overall <b>genuine move away from bureaucracy</b> and towards provision and outcomes, supported by <b>simple, consistent processes</b>.</li> </ul>

## 2. Camden Learning response to the 16-19 English and Maths L1 Qualifications consultation:

Consultation Questions	Camden Learning Response
7. Who among the 16-19 students under Condition of Funding with a grade 2 or below prior attainment do you think would benefit most from this qualification? Why?	<p><b>We strongly support a level 1 pathway for students with grades 1–2 at GCSE. This new qualification would benefit many groups of students</b> who the system is at risk of failing:</p> <ul style="list-style-type: none"> <li>● Students with SEND for whom the Key Stage 3 and 4 curriculum in English and/or Maths is very challenging.</li> <li>● Students who have missed parts of KS4 due to Emotionally Based School Avoidance or mental health challenges.</li> <li>● Students who are late arrivals in the system with low prior attainment and (for English) those with ESOL.</li> <li>● Students with very low confidence who are more challenging to engage and have spent time in AP.</li> <li>● Students at risk of NEET status, potentially less likely to be part of T Level cohorts.</li> </ul>
8. What opportunities do the proposed qualifications present for 16-19 students?	This qualification is <b>an opportunity to experience success and build momentum</b> , making progress in these subjects without just ‘repeating failure’ by immediately retaking the GCSE.

<p>9. Considering the diverse prior attainment and progress levels within this cohort, what challenges do you anticipate for those students who we envisage would typically complete the qualification within one year before moving to GCSE?</p>	<ul style="list-style-type: none"> <li>● It is important the qualification has <b>intrinsic value</b> and is not just a stepping stone to GCSE</li> <li>● It may well not be appropriate to always teach students previously attaining at grade 1 or 2 alongside grade 3 students who were 'nearer misses' - so there will be resourcing issues for providers in terms of groupings and class sizes.</li> <li>● Schools need to be for a complex sixth form cohort, through <b>appropriate funding</b>. The cohort is likely to be highly distinct from 'retakes' and school sixth forms may struggle to find economies of scale. Support for exploring innovative models of delivery across providers could also enable delivery.</li> </ul>
<p>10. Do you think these qualifications should adopt a modular structure, or would a linear structure better support achievement and progression? What risks and opportunities do you see with these options, and why?</p>	<p>We are strongly <b>supportive of the modular structure</b> - to build engagement, confidence, and incremental success. This should be supported by flexibility in the timings that students take to complete these qualifications, as some students may require more time to build up modules.</p> <p>For the target students, exams are less likely to be well-suited, and in terms of a modular approach:</p> <ul style="list-style-type: none"> <li>● It gives students the chance to exhibit strengths in some areas and experience success to motivate them to work at the areas which are more difficult</li> <li>● Students who have had a negative experience or lost momentum in KS4 have a chance for a genuinely 'fresh start' where they are achieving from the beginning. It will be easier for institutions to keep them on board</li> <li>● Students with challenges attending and/or with mental health challenges will be more likely to engage in a modular approach and feel less daunted</li> <li>● Students who are neurodivergent or with other learning needs may have particular challenges with parts of the maths curriculum but have strengths in others. A modular approach allows them to experience success.</li> <li>● Either way, the qualifications should be supported by <b>high-quality national resources and CPD</b>.</li> </ul>
<p>11. What challenges do you anticipate there would be in delivering modular qualifications for the identified cohort of students? If such challenges arise, what strategies or mitigations would you recommend to address them?</p>	<ul style="list-style-type: none"> <li>● We anticipate <b>complexities around timetabling</b> and staffing as it would probably be necessary or at least desirable to teach these modules separately from the GCSE retakes (grade 3 prior attainment)</li> <li>● There are concerns that <b>modular qualifications could be expensive</b> for schools and colleges. It would be important for this group of students to be <b>fairly funded</b> to reflect the work required to get them into work or apprenticeships</li> <li>● It will be important to <b>avoid a cycle of retakes of individual modules</b> as this will eat into teaching time and undermine the delivery of the full curriculum.</li> </ul>
<p>12. Are there particular groups of students who might be particularly advantaged or disadvantaged by either a modular or linear approach?</p>	<ul style="list-style-type: none"> <li>● Many if not most of the students likely to benefit from this qualification may have wider challenges and needs, including around motivation for continued study of English and maths, and so may be disadvantaged by a linear qualification.</li> </ul>
<p>13. Should the subject content be organised to reflect a similar structure to the future GCSE subject content requirements as set out in the GCSE subject content and assessment objectives (current versions can be seen here) for a) English language and b) Mathematics, with the addition of additional foundational content as necessary? If not, is there an alternative way of organising content that would be more suitable?</p>	<p><b>Broad alignment with GCSE</b> content is important - including to support those who can progress to GCSE - but with greater emphasis on foundational knowledge and skills. In particular:</p> <ul style="list-style-type: none"> <li>● <b>It would help for this qualification to have more obvious relevance to the world of work</b> both for practical benefits, and for the modules to make sense to employers. It is therefore important to consult employers on the qualification.</li> <li>● Obvious relevance to the world of work would help too with motivation and progression for young people.</li> <li>● There is, however, a <b>trade-off between the value of a more choice and a more work-related curriculum and the challenges of delivering this</b> when resources are scarce and many school sixth forms are small.</li> </ul>
<p>14. What should these qualifications include to help teachers teach effectively and support good learning e.g. a specific approach to structure? Please tell us why you think your suggested approach would work well.</p>	<ul style="list-style-type: none"> <li>● There needs to be <b>high-quality national resources and CPD</b> provided early, to support effective delivery.</li> </ul>
<p>15. The Review recommended that the qualifications should be graded to the equivalent of 'a strong GCSE grade 3.' Do you agree that the qualifications should recognise a level of attainment that is</p>	<ul style="list-style-type: none"> <li>● We agree that the <b>qualifications should be the equivalent of grade 3</b> but it will be vital to acknowledge and recognise achievement at grades 1 and 2.</li> </ul>

equivalent to the level of attainment that students with a grade 3 in GCSE have?	
16. Do you think that achievement below the level broadly comparable to that typical of students achieving a grade 3 at GCSE should also be recognised in the grades awarded for these qualifications?	<ul style="list-style-type: none"> <li>• Yes, <b>achievement below grade 3 needs to be recognised</b> as this will motivate students to progress through whatever routes are available.</li> </ul>
17. What are the key design considerations to ensure these qualifications have value for students who pass the level 1 qualifications but may not then progress on to gain a GCSE grade 4?	<ul style="list-style-type: none"> <li>• <b>It is important that these qualifications are relevant to the world of work and valued by employers, parents and other stakeholders.</b> As above, design of the foundational content can support this through real-world applications.</li> <li>• Clear <b>pathways for progression</b> onto opportunities like apprenticeships could also support uptake and awareness.</li> </ul>
18. Are there other key steps we could take to ensure that the qualifications are recognised and valued by employers, parents and other external audiences as a separate qualification to the GCSE? What might they be?	<ul style="list-style-type: none"> <li>• <b>Employers should be involved in the development of the qualifications</b> for the above reasons.</li> <li>• The qualifications should have a distinctive identity that does not associate them with a deficit model of GCSE 'failure'.</li> <li>• It may be possible to tie in delivery with more 'pastoral' achievements such as attendance to demonstrate preparation for work</li> <li>• For the qualifications to have standalone value, there may be a case to consider how the qualification attainment is branded - for example, as a 'pass' or 'merit'</li> <li>• There is a need for <b>high-quality national resources and CPD</b> to support effective delivery, and early provision of this will support wider delivery and impact.</li> </ul>
19. Do you think that as well as the overall qualification result being reported a student's attainment in any individual modules or components should also be reported on? What do you think are the benefits and risks of this approach?	<ul style="list-style-type: none"> <li>• There are benefits in showing particular strengths for a student who may find certain areas of the curriculum very difficult - for example due to dyscalculia or dyslexia. <b>However, on balance, there are risks to making the reporting too complex when we need parents and employers to understand.</b></li> </ul>
20. Could any of the proposals have an impact – positive or negative - on people with any of the following protected characteristics? What action could help reduce any negative impacts you identified in the previous question? Are there any other equality-related impacts you think we should consider?	<p>In general, there is a <b>risk of multiple curriculum changes happening in quick succession</b> - this is a risk both in terms of workload/planning and outcomes. From this point, as much alignment between design of these qualifications, and of wider curriculum content on English and maths will be beneficial.</p> <p>A key consideration is around incentivising delivery via <b>sustainable funding</b>, so that the offer is widely viable.</p>

### 3. Camden Learning response to the *KS4 Performance Measures and Targeted RISE* consultation:

Consultation Question	Camden Learning Response
11. How far do you agree that these changes to the Progress 8 model strike a better balance between breadth and flexibility compared with the current P8? Please explain your views.	<p><b>We welcome the principles</b> of the new Progress 8 model in supporting flexibility, balance, and breadth whilst maintaining academic rigour.</p> <p>However, <b>detailed assessment is needed to understand the potential impacts</b> on specific subject choices, and to avoid potential unintended consequences in practice, such as curriculum narrowing.</p> <p>To expand on these points:</p> <ul style="list-style-type: none"> <li>• It feels problematic that this reform is running ahead of the reform of the National Curriculum. <b>Constant change has a serious impact on workload</b> in schools and on recruitment and retention, and there is a clear need to consider workload and implementation burden for school staff and leaders. This <b>alignment of different curriculum changes is also critical to ensure that changes are coherent and can remain stable once implemented.</b></li> <li>• There needs to be <b>modelling of the potential impacts on individual subjects</b>, including the knock-on impact on KS3. For example: <ul style="list-style-type: none"> <li>a. Will <b>modern foreign languages</b> fall further down the league table of subjects chosen? We are concerned that languages are being phased out of KS3 in some schools. We fear that this proposed model will hasten that, since there is no requirement, or encouragement, to study MFL beyond KS3. Given the key role of languages in broadening minds, there is a risk that less advantaged students increasingly lose access to MFL.</li> </ul> </li> </ul>

	<p>b. Could this model discourage students from taking three science subjects? How will the inclusion of computer science/computing in the science slots impact practical choices, including the taking of Combined Science? it is less common for students to take computer science alongside a single wider science subject, for example.</p> <ul style="list-style-type: none"> <li>• More generally, the Progress 8 measure needs to be far more understandable and meaningful in the way that it is expressed - especially for parents and employers.</li> </ul>
12. What are your views on the inclusion of a fourth category (science) for breadth slots 5 and 6?	<ul style="list-style-type: none"> <li>• Including science as a fourth category in slots 5 and 6 could reinforce the imbalance between science and arts subjects, where the latter are squeezed out. There is a dedicated bucket for 2 sciences (3 and 4) and there is space for a third science in slots 7 or 8. That is sufficient. As above, the implications of how the two science slots are designed should, though, be carefully considered ahead of implementation.</li> </ul>
13. Do you agree that Progress 8 should allow technical awards in the breadth and choice slots, with a maximum of two across all slots?	<ul style="list-style-type: none"> <li>• We agree that Progress 8 should allow technical awards but we are concerned that they could push out <b>creative subjects</b> and lead to a narrowing of the curriculum for some pupils: for example a student doing travel and tourism, geography and business could allow for choices designed to maximise overlap and reinforcement between courses, and for a student to therefore miss out on creative subjects.</li> <li>• Similarly, what are the <b>incentives of the new model to include music, drama, and art</b> in subject choices?</li> </ul>
14. Do you have any comments on the minor methodological adjustment?	<ul style="list-style-type: none"> <li>• The move to a simpler banding approach may support clearer understanding of the measure. However, more widely, <b>Progress 8 is not currently understood by parents and employers.</b> These changes and supporting guidance and communications on Progress 8 need to ensure that it is clearer.</li> </ul>
16. What are your views on introducing a 'best-fit' progress measure for pupils with low prior attainment?	<ul style="list-style-type: none"> <li>• <b>We strongly support the introduction of an additional measure to better represent the progress of low prior attainers.</b> This is valuable to incentivise inclusion and promote attainment and progression for pupils with lower prior attainment, including children and young people with SEND.</li> </ul>
17. What (if any) impact do you think an additional best-fit progress measure (alongside Progress 8) would have on the qualifications for which schools enter low prior attainers?	<ul style="list-style-type: none"> <li>• We would not expect an additional measure to have a substantial impact in itself - but it can support a greater understanding of student contexts. It will be important for the measure to sit alongside clear guidance/principles for how destinations of students with lower prior attainment are monitored.</li> <li>• Schools are constantly seeking out appropriate qualifications for young people who cannot engage with the GCSE curriculum. We therefore recommend exploring if qualifications relating to life skills (e.g. King's Trust and ASDAN) could also be recognised, when recognising a student's progress and preparedness.</li> </ul>
18. The government's ambition is that the vast majority of pupils will take at least 8 qualifications at KS4, but what considerations would be important in deciding which pupils would be likely to study fewer than 8 qualifications?	<p>The decision to enter pupils for fewer than 8 qualifications should consider:</p> <ul style="list-style-type: none"> <li>• Low prior attainment or recent arrival</li> <li>• Health and welfare factors</li> <li>• SEND</li> </ul> <p>As above, we recommend <b>assessing changes to measures ahead of implementation to identify any perverse incentives, gaming opportunities, and to understand how there can be effective monitoring and accountability without excessive bureaucracy.</b></p>
19. Should this measure be visible to schools only, or also visible to parents and the wider public? Please provide further comments	<ul style="list-style-type: none"> <li>• Given the <b>Progress 8 measure is already not widely understood</b>, there are questions around whether an additional published measure, such as this, risks adding further confusion - and around how publication would work for small cohorts.</li> </ul>
22. Do you agree that from January 2027 Targeted RISE should be deployed to low achieving schools so that they can get the support they need to improve?	<p>We agree that Targeted RISE should be deployed to low achieving schools so that they can access support.</p>
23. Do you agree that we should mandate engagement with RISE but that a failure to improve will not automatically lead to structural intervention?	<ul style="list-style-type: none"> <li>• <b>We agree that RISE should not be associated with structural intervention.</b> It is vital that the support is developmental and not punitive. It is important that RISE engagement does not stigmatise schools.</li> <li>• As part of RISE funding, <b>consideration should be given to supporting time and capacity for schools to engage meaningfully with RISE activities.</b></li> </ul>
24. Do you agree that primary schools should be selected based on the	<ul style="list-style-type: none"> <li>• We support the proposed approach of using the expected standard in reading, writing, and maths to inform primary school eligibility.</li> </ul>

percentage of pupils meeting the expected standard in reading, writing and maths but schools that have made sufficient progress in each subject will not be included?	<ul style="list-style-type: none"> <li>We agree that <b>schools demonstrating sufficient progress should not be mandated to engage with RISE.</b></li> </ul>
25. Do you agree that a good starting point for primary school eligibility is where fewer than a quarter of a school's pupils have met the expected standard?	<ul style="list-style-type: none"> <li>We consider that the <b>proposed threshold for eligibility is too low.</b> Schools above this level may have urgent need for support and it would be wrong to wait for them to go below the threshold. School improvement work needs to be proactive.</li> <li><b>Eligibility should be determined by trends</b> - for example the three-year trend - rather than one year's set of results, particularly for mandated engagement.</li> <li><b>Schools should also be able to self-identify</b> as requiring support, to request engagement with RISE – as this will allow for early support. This should be combined with clear criteria for evaluation on the impact of RISE support.</li> <li><b>RISE should utilise place-based approaches and partnerships</b> like Camden Learning which offer school improvement support - using local practitioner expertise and collaborations between schools, not 'parachuting in' consultants.</li> </ul>
26. Do you agree that secondary schools should, from January 2027, become eligible for Targeted RISE based on their Attainment 8 data before reverting to a progress measure from January 2028?	<ul style="list-style-type: none"> <li>Yes - <b>we support use of the Progress 8 measure</b> to inform targeting once this is viable.</li> </ul>
27. Do you agree that for secondary school eligibility a good starting point is an Attainment 8 score of below 35.0?	<ul style="list-style-type: none"> <li>Whilst this level appears broadly suitable nationally, <b>the specific context of the school should be considered before mandating RISE engagement.</b> Eligibility should be determined by the three-year trend rather than one year's set of results.</li> <li><b>Schools should be able to self-identify</b> as requiring support so that RISE engagement provides early intervention, backed by clear evaluation on the effectiveness of interventions.</li> <li><b>RISE should utilise place-based approaches and partnerships</b> like Camden learning and use local practitioner expertise, not 'parachute in' consultants.</li> </ul>
28. Do you agree that primary schools with cohorts of fewer than 11 children should not become eligible for Targeted RISE on the basis of their pupil achievement if their performance was much higher in previous years?	<ul style="list-style-type: none"> <li>We consider that <b>eligibility should be determined by three-year trend</b> rather than on the basis of one set of results, and so support performance in previous years being taken into account.</li> </ul>
29. Do you think there are any types of school that should not be eligible for Targeted RISE support on the basis of their levels of pupil achievement?	<ul style="list-style-type: none"> <li>We consider that <b>all types of school should be able to engage with RISE support</b> where needed.</li> </ul>
30. Do you believe the proposed changes (any or all) will have a specific impact on particular groups of learners or staff because of their protected characteristics? Please explain the impact, specifying which proposal your response relates to.	<ul style="list-style-type: none"> <li>We recommend that <b>detailed assessment is conducted on the likely impact on subject choices</b> as the design of Progress 8 measures is finalised, given that specific design of slots could have unintended consequences.</li> </ul>
31. Are there any risks that the proposed changes could unfairly impact on certain types of schools or on certain groups of pupils (e.g. those from disadvantaged backgrounds, those with SEND)?	<ul style="list-style-type: none"> <li>As above, we recommend that <b>detailed assessment is conducted on the likely impact on subject choices</b> as the design of Progress 8 measures is finalised, given that specific design of slots could have unintended consequences.</li> </ul>
32. Do you have any suggestions for how any potential negative impacts on particular groups of learners or staff could be mitigated, or positive effects enhanced?	<ul style="list-style-type: none"> <li>As above, we recommend that <b>detailed assessment is conducted on the likely impact on subject choices</b> as the design of Progress 8 measures is finalised, given that specific design of slots could have unintended consequences.</li> </ul>
33. What impact do you think the proposed changes will have on staff workload or wellbeing? Please explain the impact, specifying which proposal your response relates to.	<ul style="list-style-type: none"> <li>As above, it feels problematic that this <b>reform is running ahead of the reform of the National Curriculum.</b> Constant change has a serious impact on workload in schools and on recruitment and retention, and there is a clear need to consider workload and implementation burden for school staff and leaders. This alignment of different curriculum changes is also critical to ensure that changes remain stable once implemented.</li> </ul>

35. Do you have any suggestions for how we can minimise any negative impacts on wellbeing?

- **Align consultations and reforms** in order to minimise the impact on workloads, and to support stable approaches over time.