



Federation Northern Ireland

RESPONSE TO

The Department of Education Policy Proposals Consultation Document

“Every School a Good School”: The Way Forward for Special Educational Needs and Inclusion

October 2009

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24 Hour Domestic Violence Helpline - 0800 917 1414
Open to anyone affected by domestic violence.

Core work of Women's Aid: Background information & statistics

1. Introduction

Women's Aid is the lead voluntary organisation in Northern Ireland addressing domestic violence and providing services for women and children. We recognise domestic violence as one form of violence against women. Women's Aid seeks to challenge attitudes and beliefs that perpetuate domestic violence and, through our work, promote healthy and non-abusive relationships.

2. Core Work of Women's Aid

The core work of Women's Aid in Northern Ireland, including Women's Aid Federation Northern Ireland and the 10 local Women's Aid groups is:

- To provide refuge accommodation to women and their children suffering mental, physical or sexual abuse within the home.
- To run the 24 Hour Domestic Violence Helpline.
- To provide a range of support services to enable women who are leaving a violent situation to rebuild their lives and the lives of their children.
- To provide a range of support services to children and young people who have experienced domestic violence.
- To run preventative education programmes in schools and other settings.
- To educate and inform the public, media, police, courts, social services and other agencies of the impact and effects of domestic violence.
- To advise and support all relevant agencies in the development of domestic violence policies, protocols and service delivery.
- To work in partnership with all relevant agencies to ensure a joined up response to domestic violence.

3. Women's Aid Statistics (2007 - 2008)

- 12 refuges with 300 bed spaces, playrooms and facilities.
- 1102 women and 896 children sought refuge.
- 15 resource centres for women seeking information and support; group work and training.
- 24 Hour Domestic Violence Helpline managed 24,153 calls.

- 2,205 women and 1,831 children accessed the Floating Support service supporting women in their own home.
- 2,767 children and young people accessed protection and support services.
- Move-on houses for women and children leaving refugees.

4. Statistics: Domestic Violence & Violence Against Women

- Domestic violence is a violation of Article 5 of the UN Universal Declaration of Human Rights – that “no one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment”;
- Domestic Violence is a crime. PSNI statistics for 2008/09 indicate that there were more recorded crimes with a domestic motivation (9,211) than the combined total of all the following crimes (9,155). These include all recorded sexual offences (1,943), robbery (650), armed robbery (508), hijacking (125), theft or unauthorised taking of a motor vehicle (2,954), arson (2,002) dangerous driving (746), handling stolen goods (220) and offences under anti-terrorism legislation (7).
- PSNI Statistics for 08/09 indicate that they responded to a domestic incident every 22 minutes of every day of the year.
- The number of all recorded offences of murder in Northern Ireland in 08/09 total 24. Those classed as having a domestic motivation total 7. Therefore, 29.2% of all murders in Northern Ireland in 08/09 had a domestic motivation.
- There were 381 rapes and 23 attempted rapes in Northern Ireland in the period 2008/09.

(Source: PSNI Statistics 2008/09)

- Official sources (NISOSMC) estimate that up to 80% of sex crimes are not reported.
- The joint NIO, DHSSPS Strategy “Tackling Violence at Home” estimates that the cost of domestic violence in Northern Ireland, including the potential loss of economic output, could amount to £180 million each year.

- UNICEF research released in 2006, showing per capita incidence, indicates that there are up to 32,000 children and young people living with domestic violence in Northern Ireland.
- Where the gender of the victim was known, 76% of adult victims of domestic crimes recorded by the PSNI in 2007/08 were female.*
- Over 30% of all domestic violence starts during pregnancy.**
- Violence Against Women is not limited to domestic violence, it includes amongst other crimes murder, rape, sexual assault, sexual exploitation, trafficking, sexual stalking and sexual harassment.

(*NIO Statistics & Research Branch Bulletin 16/2008 “Experience of Domestic Violence: Findings from the 2007/08 Northern Ireland Crime Survey, 2008, pg.2. N.B. “Adult” defined as aged 17 and over)

(** Women’s Aid Federation NI)

Women’s Aid Federation NI welcomes the publication of this consultation on policy proposals in respect of Special Educational Needs and Inclusion and the opportunity to comment upon it on behalf of our members.

Consultation Response Booklet

Every School A Good School

The Way Forward for Special Educational Needs (SEN) and Inclusion

The closing date for this consultation is: 31 October 2009

Your comments must reach us by this date.

August 2009

Every School A Good School

The Way Forward for Special Educational Needs (SEN) and Inclusion

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Organisation on whose behalf you are replying (if applicable)

Women's Aid Federation Northern Ireland

Does your response represent the collective view of your organisation (if appropriate)?

Yes



No



Your position within that organisation (if appropriate)

Regional Policy and Information Worker

Responses can be sent by email or post

E-mail: seninclusion@deni.gov.uk

Post: The Review of SEN and Inclusion Team
Room G18
Department of Education
Rathgael House
43 Balloo Road
Bangor
BT19 7PR

This consultation response booklet should be read alongside ‘Every School A Good School: The Way Forward for Special Educational Needs (SEN) and Inclusion’ in order to understand the context of the policy proposals.

The proposals are shown in bold throughout the consultation document; Annex A of that document provides a summary table of the proposals and their identified benefits.

We welcome views on all aspects of these policy proposals. You are asked to consider each of the consultation points. Space is provided to allow additional comment on each of the questions posed.

Opportunity is provided at the end of this response booklet for any additional comments you would care to make. If, however, you have a particular interest in one area and do not wish to comment on the whole document, feel free to complete only those sections that are of interest to you.

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Consultation Point 1 - Inclusion

(Reference: paragraphs 3.1 to 3.8)

1 Do you agree with the introduction of an inclusive framework based on the wider concept of additional educational need (AEN)?

Strongly agree Agree Don't know Disagree Strongly Disagree

X

Any other comments:

Women's Aid welcomes the recognition of additional needs. In particular in respect of points 3.4 and 3.5 (Pages 7&8), we are of the opinion that the acknowledgement that children have other life or personal circumstances, either long or short term, which could give rise to barriers in learning, is a positive development in the context of our work and may prove beneficial to children living with and experiencing domestic violence.

However, we share the concerns expressed by Mencap that the broad scope of additional needs, as defined in the consultation document, may fail to recognise the distinct nature of the difficulties experienced by children with learning difficulties and does not recognise the legal entitlement system currently in place for children with special educational needs. There is a danger therefore that some children may be lost through a broader approach.

We also contend that the principle of inclusion should reflect the diverse and often complex needs of children. These needs are not always mutually exclusive. For example a child with a disability may also be experiencing domestic violence and as such will have a number of very specific needs and requirements in respect of support.

Consultation Point 2 - Key Principles of the Proposed Policy Framework

(Reference: paragraphs 4.1 to 4.6)

2 Do you agree with the key principles on which the policy proposals are based?

Strongly agree Agree Don't know Disagree Strongly Disagree

X

Any other comments:

Women's Aid broadly supports a number of the principles outlined in the document, in particular the emphasis on a continuum of support to meet a continuum of need (4.2, Pg.10). Similarly, we welcome the stated principles of collaborative working and information sharing among schools and multi-agency working.

However, we would seek greater clarification in respect of principle (h) that, "All professionals, including teachers, have the skills and knowledge to allow early identification and intervention to facilitate improved outcomes." (Pg.10) It is essential that the role of professional/teacher is clearly defined in this context. In particular, will they be trained in identifying the specific needs and/or to provide the necessary intervention? This in turn raises issues in respect of the scope of their professional roles and functions, the parameters of which should be clearly defined and delineated.

Similarly, whilst we welcome the principle (m) of involving parents and carers in the development and maintenance of any programme put in place to support their child, we would contend that in cases involving domestic violence, it is not always possible, practical, safe or appropriate for both parents to be directly involved.

Once again we share Mencap's concerns in respect of key change (4.3, d) (Pg.12) specifically, "placing a greater responsibility on all schools to provide for the early identification of the diversity of need, assessment, planning and delivery of support programmes and the monitoring of subsequent progress of individual children who need support." We note that the consultation document lacks specific detail in respect of the assessment process. Similarly, there is no detail on any appeal process. We are also concerned that as Schools are currently not designated public bodies, there is no formal structure of accountability in respect of equality of opportunity.

Detail is also required in respect of specific communication protocols on the exchange of information and on the criteria that will be utilised by professionals in the evidence gathering and decision making processes.

We are also concerned about the delegation of SEN funds currently held centrally by the ELBs to mainstream schools. (4.3 j) (Pg.12) Whilst this may serve to streamline funding and target need more effectively at source, it is essential that these funds are ring fenced and that spending is subject to scrutiny. To this end, we would welcome much greater detail on the specific nature of the proposed monitoring function of the ESA. (4.3 k) (Pg.12)

5 Do you agree with the proposals relating to primary and post primary?

Strongly agree Agree Don't know Disagree Strongly Disagree
X

Any other comments:

In respect of Nurture Groups (7.4, Pg.19), we recognise the potential benefits for children showing signs of emotional, behavioural or socialisation difficulties, to have a safe and nurturing environment in the school context within which to develop.

However, we have concerns that this process may serve to potentially label and further isolate children by removing them from their peer group. As such we would welcome greater detail on the time period spent within these groups and the process of reintegration. It is also essential that children outside the nurture groups are encouraged to respect and embrace diversity.

Consultation Point 6 - Training and Development

(Reference: paragraphs 8.1 to 8.5)

6 Do you agree with the proposals relating to training and development?

Strongly agree Agree Don't know Disagree Strongly Disagree
X

Any other comments:

Women's Aid agrees with the proposals outlined in points 8.1–8.5 (Pgs. 22-23). We note however, that there is an absence of specific detail on the proposed training. We would strongly recommend that appropriate domestic violence awareness training should be integrated into the curriculum of initial teacher education as a matter of course. It is essential that teaching professionals are fully aware of the impact of domestic violence on children if they are to recognise need. We also advocate that this training should extend to the continued professional development (CPD) of all teachers.

Strongly agree Agree Don't know Disagree Strongly Disagree

Any other comments:

Consultation Point 8 – Co-ordinated Support Plans

(Reference: paragraphs 10.1 to 10.6)

8 Do you agree with the proposals relating to Coordinated Support Plans (CSP)?

Strongly agree Agree Don't know Disagree Strongly Disagree

X

Any other comments:

Women's Aid supports Mencap's concerns that there is no evidence contained in the consultation document to suggest that a parent can request a CSP for their child. In addition, no evidence has been provided to indicate that parents can state a preference for a specific school.

Consultation Point 9 - Transition Points

(Reference: paragraphs 11.1 to 11.7)

9 *Do you agree with the proposals relating to transition points?*

Strongly agree Agree Don't know Disagree Strongly Disagree

Any other comments:

(a) Within school and pre-school settings? (paragraphs 12.3 to 12.5)

Strongly agree Agree Don't know Disagree Strongly Disagree

Any other comments:

10 Do you agree with the proposals relating to the development of effective partnerships:

(b) Across educational settings & learning communities? (paragraphs 12.6 to 12.7)

Strongly agree Agree Don't know Disagree Strongly Disagree

Any other comments:

10 Do you agree with the proposals relating to the development of effective partnerships:

(c) Between mainstream and special schools? (paragraph 12.8)

Strongly agree Agree Don't know Disagree Strongly Disagree

Any other comments:

10 Do you agree with the proposals relating to the development of effective partnerships:

(d) Between Education and Health and Social Care (e.g. Education and Skills Authority and proposed Regional Health Boards)? (paragraphs 12.9 to 12.17)

Strongly agree Agree Don't know Disagree Strongly Disagree

Any other comments:

10 Do you agree with the proposals relating to the development of effective partnerships:

(e) Between the Department of Education (DE) and the Department of Employment and Learning (DEL)? (paragraph 12.18)

Strongly agree Agree Don't know Disagree Strongly Disagree

Any other comments:

10 Do you agree with the proposals relating to the development of effective partnerships:

(f) Through the establishment of Multi-disciplinary Groups? (paragraphs 12.19 to 12.25)

Strongly agree Agree Don't know Disagree Strongly Disagree

X

Any other comments:

Women's Aid would welcome some clarification on whether the voluntary sector will be able to participate on Multi-Disciplinary Groups (MGs). In addition, we would seek clarity on whether or not MGs will have an advocacy role on behalf of children and their parents.

10 Do you agree with the proposals relating to the development of effective partnerships:

(g) With parents and carers? (paragraphs 12.26 to 12.28)

Strongly agree Agree Don't know Disagree Strongly Disagree

Any other comments:

10 Do you agree with the proposals relating to the development of effective partnerships:

(h) With children and young people? (paragraph 12.29)

Strongly agree Agree Don't know Disagree Strongly Disagree

Any other comments:

10 Do you agree with the proposals relating to the development of effective partnerships:

(i) With voluntary organisations? (paragraph 12.30)

Strongly agree Agree Don't know Disagree Strongly Disagree

X

Any other comments:

Women's Aid welcomes the acknowledgement in point 12.30 (Pg.40) that, "voluntary organisations can play an effective role" and the proposal that, "ELBs/ESAs, the proposed RHSCB and schools should regularly involve, where appropriate, the voluntary sector in training courses and the exchange of relevant information."

Consultation Point 11 - Outworking of the Proposed Model

(Reference: paragraphs 13.1 to 13.9)

11 Do you agree with the replacement of the sequential stages of 1-5 of the current CoP by the proposed 3 strand model (Within School, Within School plus External Support, Co-ordinated Support Plans)?

Strongly agree Agree Don't know Disagree Strongly Disagree

Any other comments:

Consultation Point 12 - Resolution and Appeal Mechanisms

(Reference: paragraph 14.1)

12 Do you agree that the current informal appeal, dispute avoidance and resolution and formal appeal arrangements (SENDIST) for children with SEN should remain unchanged?

Strongly agree Agree Don't know Disagree Strongly Disagree

Any other comments:

13 Do you agree with the proposals relating to funding?

Strongly agree Agree Don't know Disagree Strongly Disagree

X

Any other comments:

We would refer to our response to Consultation Point 2 specifically it is our opinion that in the absence of ring-fencing, funding arrangements should be Government directed and not school directed.

Consultation Point 14 - Monitoring, Review, Evaluation & Accountability

(Reference: paragraphs 16.1 to 16.5)

14 *Do you agree with the proposals relating to monitoring, review, evaluation & accountability?*

Strongly agree Agree Don't know Disagree Strongly Disagree

X

Any other comments:

A number of the proposals require further clarification, in particular point 16.4 (Pg.49) which discusses the delivery of robust mechanisms through the settling of relevant and purposeful measures which schools will be required to take in assessing and meeting the needs of pupils who present with additional needs. Detail on the nature of these mechanisms would be welcome.

Similarly, in acknowledging best practice and in seeking consistency across Northern Ireland it is essential that performance indicators reflect the extent to which individual and specific need is met.

Consultation Point 15 – Roles and Responsibilities

(Reference: paragraphs 17.1 to 17.19)

15 Do you agree with the proposals relating to the roles and responsibilities for:

(a) The Department of Education (DE)? (paragraphs 17.1 to 17.2)

Strongly agree Agree Don't know Disagree Strongly Disagree

Any other comments:

responsibilities for:

(b) The proposed Education and Skills Authority (ESA)? (paragraph 17.3)

Strongly agree Agree Don't know Disagree Strongly Disagree

Any other comments:

15 Do you agree with the proposals relating to the roles and responsibilities for:

(c) The Department of Health, Social Services and Public Safety (DHSSPS)? (paragraphs 17.4 to 17.6)

Strongly agree Agree Don't know Disagree Strongly Disagree

Any other comments:

15 Do you agree with the proposals relating to the roles and responsibilities for:

(d) Multi-disciplinary Groups (MGs)? (paragraphs 17.7 to 17.8)

Strongly agree Agree Don't know Disagree Strongly Disagree

Any other comments:

15 Do you agree with the proposals relating to the roles and responsibilities for:

(e) Mainstream schools and other educational establishments?

(paragraphs 17.9 to 17.16)

Strongly agree Agree Don't know Disagree Strongly Disagree

Any other comments:

15 Do you agree with the proposals relating to the roles and responsibilities for:

(f) The Education and Training Inspectorate (ETI)? (paragraphs 17.17 to 17.18)

Strongly agree Agree Don't know Disagree Strongly Disagree

Any other comments:

15 Do you agree with the proposals relating to the roles and responsibilities for:

(g) Children's Services Directors? (paragraph 17.19)

Strongly agree Agree Don't know Disagree Strongly Disagree

Any other comments:

Consultation Point 16 - Proposed Phased Introduction of the Policy

(Reference: paragraphs 18.1 to 18.7)

16 Do you agree with the proposed phased introduction of the policy?

Strongly agree Agree Don't know Disagree Strongly Disagree

Any other comments:

Additional Comments

If you have any additional comments you wish to make about the proposals please use the box below.

Women's Aid would wish to support the view that any pupil with Special Educational Needs should automatically have the opportunity to access Transition Support Services. It is our understanding that this is currently only available to those with a statement.