

# Summary Report of Consultation Responses

Special Educational Needs (SEN)

Code of Practice

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## **SECTION 1 – Introduction**

### **The New SEN Framework**

The Special Educational Needs and Disability Act (Northern Ireland) 2016, known as the SEND Act, received Royal Assent in March 2016. The SEND Act introduces important changes to the Education (Northern Ireland) Order 1996 (the 1996 Order) which contains the current primary legislation provisions relating to Special Educational Needs (SEN). The provisions covered by the SEND Act have, in the main, yet to be commenced as they are dependent on having in place the necessary supporting SEN Regulations and Code of Practice. Collectively, the SEND Act, the draft SEN Regulations and associated Code of Practice are known as the **new SEN Framework**.

### **Consultations on the draft SEN Regulations and draft Code of Practice**

The draft SEN Regulations and draft Code of Practice (draft SEN Code) were each subject to public and targeted consultations which the Minister launched on 30 September 2020. The consultations were due to run for 12 weeks until the 22 December 2020, however due to the on-going pandemic and associated lockdown measures which included the closure of schools, the closing date for the consultations was extended and they concluded on 2 March 2021. A number of respondents indicated that the timing of the consultation, in the midst of a pandemic, did not provide enough time to allow for full scrutiny of the documentation. While the Department acknowledges the views of the respondents, it is important to highlight that there has already been significant delay in bringing forward changes to the SEN Regulations and associated Code of Practice and the Department did not wish to delay any further. It should also be noted that two extensions were granted to the deadlines resulting in the consultations being open for 22 weeks rather than the recommended 12 weeks.

The Department attaches importance to its consideration of all of the responses received and has taken care to fully understand and reflect the range of perspectives that respondents provided. The Department wishes to take this opportunity to thank all those who responded to the consultations for taking the time to express their views.

The remainder of this document focuses on the responses to the consultation on the draft SEN Code; a separate document has been prepared in relation to consultation on the draft SEN Regulations. This document is a summary of the findings and does not list all individual comments received.

### **The draft SEN Code of Practice**

The draft SEN Code has been developed to reflect the primary legislation - the 1996 Order, as amended most recently by the SEND Act and the draft SEN Regulations. The draft SEN Code provides practical guidance on the detailed processes and timescales to be followed by Boards of Governors, the Education Authority (EA) and health and social care authorities (this includes the Health and Social Care Trusts – HSCT) to carry out their statutory duties to identify and assess if a child has, or may have, special educational needs and to put in place special education provision for those children who have SEN.

The draft SEN Code is divided into 14 sections as follows:

- Section 1: Introduction: Principles and Procedures
- Section 2: The Law, Roles, Rights and Responsibilities
- Section 3: Identification, Assessment and Provision by Schools
- Section 4: Statutory Assessment
- Section 5: Making and Maintaining a Statement
- Section 6: Children Under Compulsory School Age – Services, Assessments and Statements
- Section 7: Annual Review of a Statement
- Section 8: Transition Planning for a Child with a Statement
- Section 9: Co-operation between Education and Health
- Section 10: Children in Specific Circumstances
- Section 11: Advice and Information
- Section 12: Disagreements, Appeals, Mediation and Tribunals
- Section 13: Children Over Compulsory School Age
- Section 14: Inclusion of Children with Special Educational Needs (SEN) and/or a Disability

The draft SEN Code is supported by a number of Annexes to provide more detail. They include flow charts and checklists which have been developed by teachers and SENCos for day-to-day consistent use by teachers, Learning Support Co-ordinators (LSC) and EA officers.

In the course of developing the consultation version of the draft SEN Code, the Department discussed and considered comments from schools, EA and Health and Social Care authorities, who are key to ensuring the effective delivery of the new SEN Framework. The Department wishes to thank all those who provided input and views.

### **The Personal Learning Plan (PLP)**

Section 3 of the SEND Act (when commenced) requires that every registered pupil at school who has SEN must have a PLP. As part of the consultation the Department sought views on the proposed content of the PLP templates for nursery schools and nursery classes (in primary schools), primary schools, post-primary and special school settings.

The PLP is to be used to record the special educational provision put in place to help a child's progress and improve their outcomes. Practical guidance for creating, maintaining, reviewing, and, as appropriate, the sharing of a PLP is provided in the draft SEN Code. The PLP pulls together information about a child's SEN and factors which may be contributing to those needs. The information includes expected outcomes, teaching strategies and resources, special educational provision to be made, monitoring and review arrangements and the outcome of the special educational provision on the child's progress. The PLP will be the key information and evidence base for the purpose of seeking EA support through the EA plan or arrangements for special educational provision. The PLP will be held on the Schools Information System (SIMS). The PLP templates were developed with C2K, the EA and SENCo clusters across the different school phases and the Special Schools' Strategic Leadership Group.

## **SECTION 2 – CONSULTATION METHODOLOGY**

The consultation was advertised on the Department's website, social media pages, NI Direct website and via the C2k network which provides the Information and Communication Technology (ICT) service for all grant-aided schools in Northern Ireland. The consultation documents were offered in different formats, available on request, and an easy read version of the consultation document was made available on the Department's website.

The consultation consisted of the following nine documents:

- a) Consultation document on the draft SEN Code.
- b) The draft SEN Code (presented in 14 Sections with Annexes and a Glossary).
- c) Summary guide on the draft SEN Code for parents and young people.
- d) Easy Read – draft SEN Code.
- e) Example Personal Learning Plans (PLPs) and PLP Descriptors (explanation of data fields).
- f) Equality and Human Rights Screening – SEN Framework 2020.
- g) Rural Needs Impact Assessment – SEN Framework 2020.
- h) Data Privacy Impact Assessment – SEN Framework including PLP 2020.
- i) Privacy Notice for DE Consultations on draft SEN Regulations and SEN Code.

Consultation on the proposed draft SEN Code was undertaken through two processes: public consultation and targeted consultation. A list of responses submitted via Citizen Space and by email can be found at Annex B, this does not include the names of individuals who responded.

### **Public Consultation**

The public consultation was managed through the NI Direct Citizen Space online portal. Questions 1 & 2 related to the individual or organisational identity; thereafter respondents were directed to reply to the specific questions that were related to key areas of the draft SEN Code of Practice and the PLP as follows:

- Q3. Do you agree that the responsibilities of the Learning Support Co-ordinator (LSC) are clearly set out in the SEN Code?

- Q4. Where there is a concern that a child may have SEN, do you agree that the process to be followed by schools is clear in the SEN Code?
- Q5. Where a child is at Stage 1 of special educational provision, do you agree that the process to be followed by schools is clear in the SEN Code?
- Q6. Where a child is at Stage 2 of special educational provision, do you agree that the process to be followed by schools is clear in the SEN Code?
- Q7. Where a child is at Stage 3 of special educational provision, do you agree that the process to be followed by schools is clear in the SEN Code?
- Q8. Do you agree with the proposed content of the Personal Learning Plan (PLP)?
- Q9. Once a child with a Statement reaches the age of 14, do you agree that the school process for the completion of the first transition plan is clear?
- Q10. Do you have any other comments you wish to make on the draft SEN Code?

In total 212 responses were received to the consultation: 178<sup>1</sup> via Citizen Space and 34 via email. Respondents were directed to answer each question as Strongly Agree, Agree, Neither Agree or Disagree, Disagree, Strongly Disagree or Don't Know. A free text box was also provided against each question facilitating the respondent to add more context to their answer if they wished; respondents could also leave the answer to a question blank but provide commentary in the free text box.

Email responses received were a combination of structured i.e. answering specific (all or some) questions posed or were unstructured, i.e. not specifying which question(s) the response related to. As all responses did not reply as directed, we are unable to publish statistics in relation to these responses, however these responses have been included in the analysis within this report. Where statistics have been included in the report (Questions 3 to 9), these relate to the responses received via Citizen Space.

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<sup>1</sup> 13 of the original 178 were originally received by email but as they matched the online portal format they were uploaded by DE staff with the permission of the respondent.

## Targeted Consultations

The public consultation was complemented by a targeted approach to secure more in-depth feedback on some of the specific changes that are being proposed from those who will be most affected by them, that is, children and young people with SEN and their parents/carers.

### Parents/Carers<sup>2</sup>

The targeted consultation with parents was taken forward by Parenting NI on behalf of the Department. It was agreed to use a focus group approach so that parents could be supported more effectively and also to support them to express their views through the completion of one to one surveys. In total 46 parents participated in this consultation: the 46 participants had a total of 76 children ranging in age from a few months old to over 19 years old and covered all phases of school i.e. nursery, primary, post-primary and special. The parents were also representative of rural and urban/suburban communities. One parent had to leave the session just as questions were being asked about the draft SEN Code of Practice therefore responses are based on 45 parents.

The focus group method of collating information brought parents together in a way that enabled them to share their views and identify issues both of individual and common concern through informal, stimulating discussion.

The consultation focused on the following questions in relation to the draft SEN Code and PLP and the responses are summarised in Section 5:

- Q1. Do you agree that the 3 Stages for special education provision are clear?
- Q2. Does the content of the PLP allow for a comprehensive picture of your child to be portrayed?
- Q3. Is the terminology used in the PLP clear and easy for you to understand?
- Q4. What additional support materials do you think could be created which might help you better understand the purpose of the PLP and the processes surrounding it?

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<sup>2</sup> Throughout this document when parents are referred to this encompasses carers also.



- Q5. Does the PLP allow sufficient scope for you to share your views of your child's difficulties and your aspirations for their future progress?
- Q6. Are you content for child's HSC (Health and Social Care) Number to be included in the PLP?

### Children and Young People

The targeted consultation with children and young people was taken forward by the Youth Service within the Education Authority. A total of 81 schools were contacted and 37 schools agreed to participate. Unfortunately some schools had to withdraw due to the coronavirus pandemic which resulted in a total of 21 schools participating in the consultation, covering 249 children and young people; ranging from year 5 to year 14.

A key focus of the consultation with children and young people was on the Personal Learning Plan (PLP). Responses from children and young people, to the following questions, are summarised in Section 5.

- Q1. The PLP will help you to receive the right amount of support.
- Q2. It is important that you have a say as to what is included in your PLP.
- Q3. The PLP will help you with your learning.
- Q4. The PLP will clearly highlight your strengths and difficulties.
- Q5. The PLP will represent you and your needs.
- Q6. The PLP will help you to receive additional support.
- Q7. The language used in the PLP is clear and easy to understand.
- Q8. Understand why you have a PLP.
- Q9. Who you think should have a say as to what is included in your PLP.

## SECTION 3 – SUMMARY OF PUBLIC CONSULTATION RESPONSES

This section of the report focuses on the responses received to the public consultation. Respondents were encouraged to respond using the online portal however a number of organisations felt that this process was too restrictive and did not provide sufficient opportunity to fully express their views so they submitted a response via email. It is also important to note that respondents were not compelled to answer each question so at times the percentages provided are only of those that answered that specific question.

As explained earlier in this report, 212 responses were received to the consultation: 178 online via Citizen Space and 34 via email.

### Breakdown by Respondent Type

Responded as	Total	Percent
An individual (online)	68	32%
On behalf of an organisation/company (online)	110	52%
On behalf of an organisation/company (by email)	34	16%
<b>Total Responses</b>	<b>212</b>	<b>100%</b>

Of the 110 responses received on behalf of an organisation, 80 were from schools and 30 from other organisations. Of the 80 responses from schools it should be noted that eight of the responses came from different people within one school and a further one school submitted two responses from the same person.

Of the 34 responses received via email, 14 identified as being from schools and 20 from other organisations. It should be noted that one of the 14 responses from schools actually covered six schools and 1 other school submitted 8 identical responses (from various people within the same school).

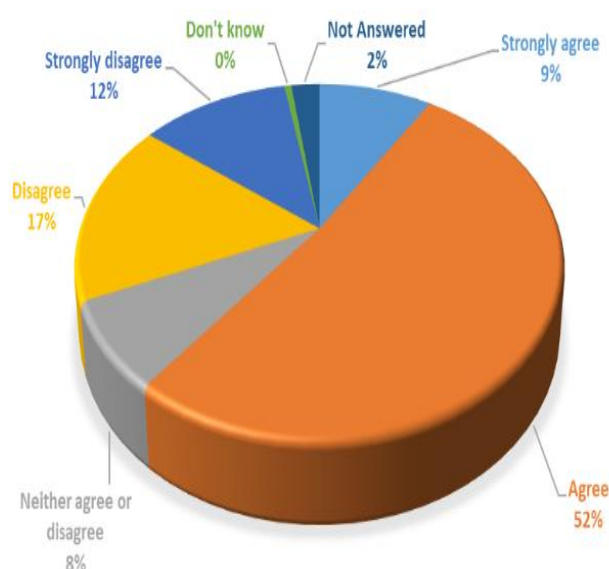
## SECTION 4 – FINDINGS – PUBLIC CONSULTATION

As stated earlier questions 1 and 2 refer to the identity of the individual or organisation and therefore specific questions on the draft SEN Code commenced at question 3 in the consultation document. The responses in relation to each question are covered in the subsequent pages.

### Q3: Do you agree that the responsibilities of the Learning Support Co-ordinator (LSC) are clearly set out in the SEN Code

#### Department's proposal:

The aim is to set out clearly the responsibilities of the LSC and the links to senior management and teachers. The draft SEN Code emphasises that the senior leadership of the school are required to support and guide the LSC on all aspects of their SEN co-ordination role. The LSC co-ordination role includes overseeing the day to day operation of the school's SEN policy, SEN provision planning and working with other teachers where there is a concern that a child may have SEN. The role also includes providing direction concerning the completion of Personal Learning Plans for a child with SEN.



There were 178 respondents to the questionnaire on-line, 174 of which responded to this question; four respondents did not answer the question, however two of those provided comments in the free text box. The 174 respondents to this question comprise of 79 responses from schools, 28 from other organisations and 67 respondents were individuals.

Of the responses received online, 61% of respondents indicated they were content that the responsibilities of the Learning Support Co-ordinator (LSC) are clearly set out in the draft SEN Code while 29% responded that it was not clear. Many responses commented on the role and responsibility of the LSC and these varied with some seeking further clarity and guidance on what the role involved, while others commented on the increased time and workload needed to execute LSC duties and the additional pressure this will cause. Others questioned what funding, training and support will be available.

The comments received online have been echoed by those who submitted responses via email therefore the following commentary covers responses online and via email.

#### Summary of comments received (online and by email)

- A number of respondents raised concern as to how the LSC job role can be fulfilled in a small school, i.e. the LSC job role may fall to a principal that already has teaching responsibilities. It was also commented that this could lead to a conflict of interest and be open to challenge as the principal would be reviewing their own work. Other respondents thought that the LSC role would be unmanageable in medium and large schools where there is only one LSC with a lot children with SEN. A question was asked as to whether larger schools can appoint more than one LSC or perhaps the role could be shared with for example a Head of Year.
- Concerns were raised that LSCs with teaching commitments may not be able to fulfil both roles; a number of respondents recommended that LSCs should have time 'ring-fenced' to protect and ensure they can carry out their role to the very best of their ability. Other respondents recommended that there should be guidelines (or a formula) to determine a reasonable ratio of pupils with SEN per LSC. A common point raised here was ensuring that the LSC has sufficient time afforded to them to perform their role effectively.
- Several respondents commented that the LSC role would apply to every teacher in a special school and that this is unworkable. It was requested that the workload associated with an LSC, in any type of school, be workload assessed alongside consideration for additional remuneration.

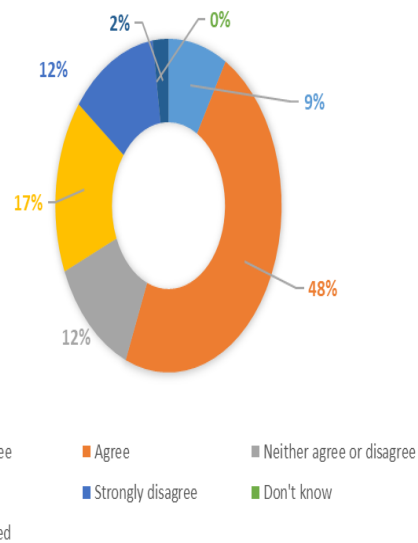
- Concern was raised how the LSC role could be filled without timely support/intervention from EA and health; and if the EA plan of arrangements for special educational arrangements was not in place. It was also felt that the EA plan of arrangements for special educational provision should be consulted and finalised before any other areas of the draft Regulations or draft SEN Code be implemented.
- It was welcomed that the draft SEN Code recommends that, where possible, the LSC should be a member of a school's Senior Leadership Team (SLT) however it was stated that the draft SEN Code should go further, that is, the LSC should be a member of the SLT unless a school can demonstrate / outline the reasons why this is not possible.
- Respondents wanted clarity as to whether the existing Special Educational Needs Co-ordinator (SENCo) would automatically become the LSC or if the experience for an LSC could be phased in.
- A number of respondents recommended that the Department consider introducing mandatory minimum annual continuous professional development (CPD) requirements for LSCs and also specialist training in for example, accredited autism training, deaf awareness training and also joint training for LSCs and Allied Health Professionals as it is thought this would be in line with legal requirement for health and education to co-operate on SEN.
- Others commented that the focus of the draft SEN Code should be on meeting and supporting the needs of the child and not in creating bureaucracy and paperwork.

**Q4: Where there is a concern that a child may have SEN, do you agree that the process to be followed by schools is clear in the SEN Code?**

**Department's proposal:**

The draft SEN Code is about children who have, or may have, SEN. It sets out the approach schools (nursery schools or classes, primary and post-primary and special schools) should take where there is a concern that a child may have SEN. The approach to be taken will help determine whether a child's learning difficulty can be catered for through normal differentiation of educational provision or if the learning difficulty is significant and calls for special educational provision to be made. If it is decided that a child requires special educational provision it is only at this point that the child should be entered on the school's SEN Register and a PLP should be created.

This question was answered by 174 respondents. For this question four respondents did not answer the question, however three of them provided comments. 57% of online respondents indicated they were content that the process to be followed by schools is clear and concise within the documentation.



Respondents welcomed the move to three stages and felt that to move from stage 2, with external support, to statementing, (as appropriate) is a more fluid and meaningful process, than the previous requirement for repetitive information gathering as with stage 4. It was considered that stage 4 really had no meaning and was like a waiting room while the Statement came through. Those respondents that did not agree (29%) wanted the process of implementing a new SEN Code of Practice to be slowed down to ensure that the EA and schools are in a position to deliver the advice and support

that is required by the system and there is a clear and transparent plan by which they will do this which is available to the public. It was also commented that schools didn't know how and where to access support services.

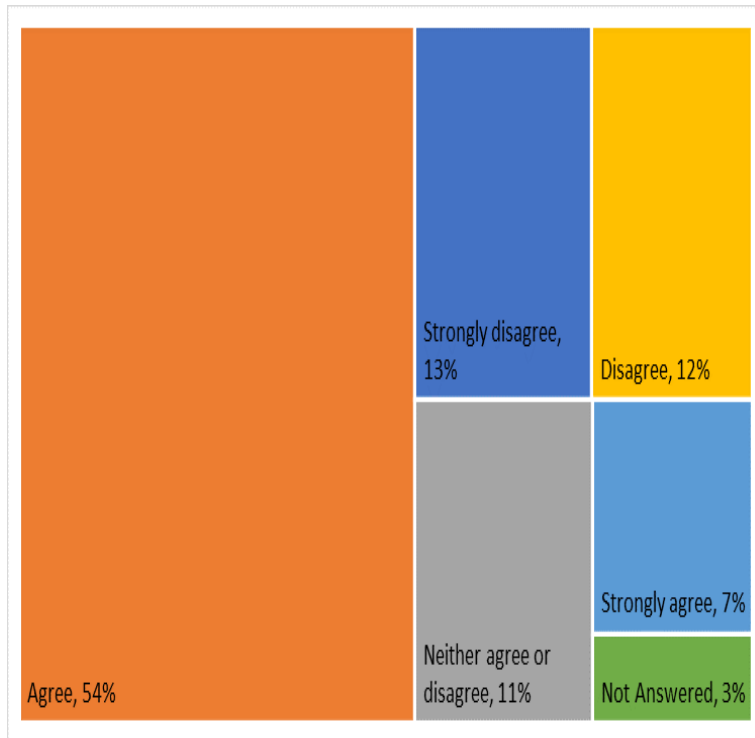
#### Summary of comments received (online and by email)

- While the move from 5 Stages to 3 was welcomed a small number of respondents were concerned that with the change, some pupils could be lost in transition to the new process i.e. those pupils who are currently at Stage 1.
- There were many positive comments about the Annexes, flow charts and checklists with respondents stating that they were a useful tool, providing structure and additional guidance for teaching staff. A few responses stated that the '*checklist process was designed to slow the process down*', while others had concerns that schools would become entangled in a complex process and lose sight of the child.
- The term 'whole school provision' caused uncertainty for a number of respondents with them seeking further clarification on what this means and highlighting concerns that this term could be interpreted differently by individual schools. Others felt that the draft SEN Code provided good examples of whole school provision but more emphasis needed to be placed on the fact that concern can be raised at any stage in a pupil's school life.
- A few responses queried if the timeframe was tight enough, questioning what should be constituted as a '*reasonable time*' between when initial concerns are raised, until the pupil is placed on Stage 1 of the new process.
- Respondents commented that it is imperative that there are no perceived, nor actual blocks, to children accessing the provision to meet their needs when they need it.

**Q5: Where a child is at Stage 1 of special educational provision, do you agree that the process to be followed by schools is clear in the SEN Code?**

**Department's proposal:**

Stage 1 - School delivered special educational provision



This question was answered by 173 respondents; five respondents did not answer the question, however three of them provided comments. Of the responses received, 61% were content that the process to be followed by schools when a child is at Stage 1 of special educational provision is set out clearly in the draft SEN Code; 25% of respondents did not agree that the process was clear.

Respondents commented on the need for schools to be able to access sufficient training if the framework has any chance of being successful and that while the process is clear, it is still very extensive and overwhelming for a school with a high level of SEN and medical needs.

Summary of comments received (online and by email)

- Quite a few responses highlighted their concern about further responsibility and accountability being placed on schools, teachers and Boards of Governors.
- Also raised was the lack of clarity on how schools will be enabled to provide the support and level of education required by pupils without appropriate resources and funding.



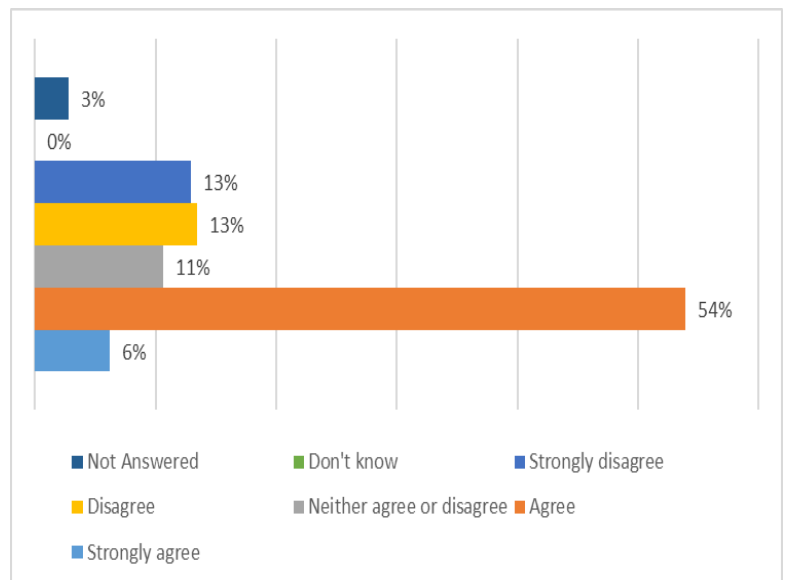
- Comments referred to the dual role of the LSC and the perceived difficulties in managing additional SEN workload while still monitoring children in a busy classroom.
- Comments indicated further clarity was needed around the interpretation of 'reasonable adjustments' and 'provision' and the ambiguity on movement between stages.
- While agreeing that the process was clear, a number of respondents felt that improved collaboration between health and education was needed with better awareness of support available from EA and Health at this stage of the SEN process.
- Responses referred to the transparency of recording and reporting the number of children on stage 1 i.e. danger of retaining children at stage 1 who should be at stage 2 but are waiting on services.
- Other comments stated that the processes were clear and found annexes and flow charts helpful. Respondents welcomed the recognition in the consultation that schools are best placed to decide when a child's difficulties are special educational needs.

**Q6: Where a child is at Stage 2 of special educational provision, do you agree that the process to be followed by schools is clear in the SEN Code?**

**Department's proposal:**

Stage 2 - School delivered plus external provision from the EA and/or where appropriate, a HSCT. Stage 2 will only commence on provision of EA and/or HSCT support i.e. delivery of resources, advice or support.

This question was answered by 173 respondents. For this question five respondents did not answer the question, however four of them provided comments. The majority of responses (60%) indicated that respondents were content that the process to be followed by schools when a child is at Stage 2 of special educational provision is set out clearly in the draft SEN Code, however a number of concerns were raised.



Most of the respondents stated that although the flowcharts and diagrams look clear and easy to follow, the whole process and transition between stages relies heavily on all stakeholders fulfilling their roles and responsibilities efficiently.

In response to this question, respondents via the online portal and those received via email shared concerns about the ability to access stage 2 services in terms of delays, waiting lists and the time allocation model for Education Psychology Services. Several responses also indicated that access to these services is limited and application for them is lengthy and repetitive.

### Summary of comments received (online and by email)

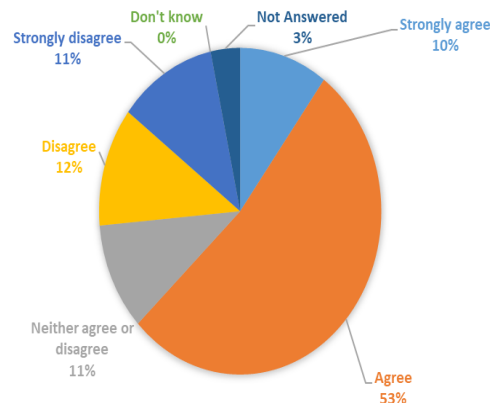
- Several responses highlighted concerns about potential additional workload, in particular for the LSC gathering and collating paperwork, detracting from the time available to be spent with the child.
- A number of responses stated that consideration regarding threshold/criteria for statutory assessment should always be evidence and needs based rather than resource led. It was welcomed that the draft SEN Code set out the principles EA are required to follow.
- Several responses commented that clearer communication is needed between schools and the EA on how decisions are made about whether stage 2 provision remains appropriate for a child or whether they should progress to stage 3.
- All advice and information taken into account when considering whether to make a statutory assessment should be in writing if the process is to be open and transparent.

**Q7: Where the child is at Stage 3 of special educational provision, do you agree that the process to be followed by schools is clear in the SEN Code?**

**Department's proposal:**

Stage 3 - School plus special education provision as set out in a Statement of Special Educational Needs (Statement).

This question was answered by 172 respondents; 26 responses were received from organisations, 79 were from schools and 67 from individuals. For this question six respondents did not answer the question, however four of them provided comments.



The majority of respondents were content that the process to be followed by a school when a child is at stage 3 is clear as set out in the draft SEN Code, concerns were raised regarding the interpretation of 'reasonable adjustments' and 'provision'. It was also highlighted that clarity is required as to the time between when a request for statutory assessment is made and the Statement is finalised.

Summary of comments received (online and by email)

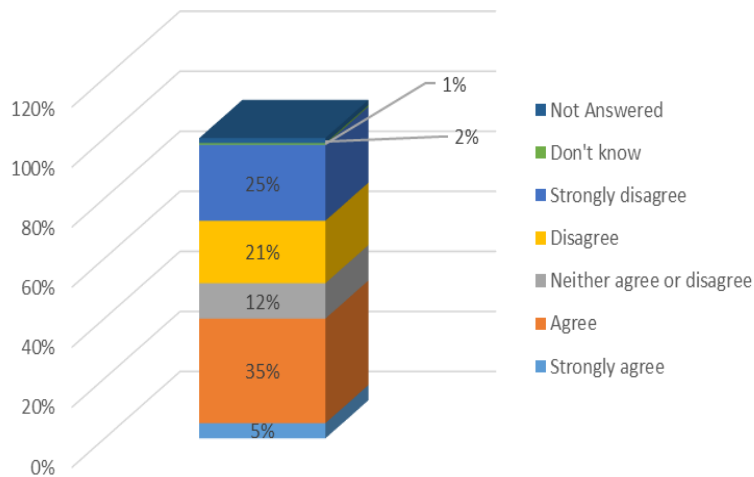
- Respondents commented about delays and children having to wait until stage 3 to get the support they need.
- There were concerns that a greater onus is being placed on Boards of Governors, principals and senior staff of schools to implement and oversee stage 3 provision. Specific, relevant training for all is needed.
- Many responses welcomed the intention to introduce a consistent approach to writing Statements across Northern Ireland but did not see how this would be achieved.
- Several responses indicated that Statements should be clear, unambiguous with nature and extent of provision set out and easily understood by all.

- Comments were received on the format of the Statement in particular, the content in parts 3 and part 6 relating to educational and non-educational provision and the legislative implications.
- All advice and information gathered as evidence in the decision making process should be in writing, not verbal and shared with parents.
- Respondents indicated that the timeframe for the EA to make a decision regarding a statutory assessment and associated Statement is still too long even at 22 weeks, and raised concerns about how adherence to timescales was going to be ensured. It was also questioned how schools are going to be resourced/equipped to provide for pupils while waiting on an EA decision.
- Other comments indicated that the draft SEN Code was clearest on stage 3 and the timeframes around this. The recognition that the assessment process can be stressful and the measures to encourage participation and open discussion was welcomed.

## Q8: Do you agree with the proposed content of the Personal Learning Plan (PLP)?

### Department's proposal:

The PLP is required to be used to record the special educational provision put in place to help a child's progress and improve outcomes. Practical guidance for creating, maintaining, reviewing, and, as appropriate, the sharing of a PLP is provided in the draft SEN Code. The PLP pulls together information about a child's SEN and factors which may be contributing to those needs.



This question was answered by 175 respondents, three respondents did not answer the question, however all three of them provided comments.

The introduction of the PLP received a mixed reaction, with 40% either strongly

agreeing or agreeing with its proposed content, while 46% did not agree or strongly disagreed.

The hosting of the PLP on the Schools Information Management System (SIMS) was welcomed as it can be easily accessed and the sharing of information from primary to post-primary schools can be easily facilitated. However, it was highlighted that not all nursery schools have access i.e. standalone nurseries do not currently have access to SIMS.

There were concerns raised regarding the size of the document and uncertainty about how often teachers will be required to update the PLP, what information it would contain, and how medical and health advice would be incorporated.

### Summary of comments received (online and by email)

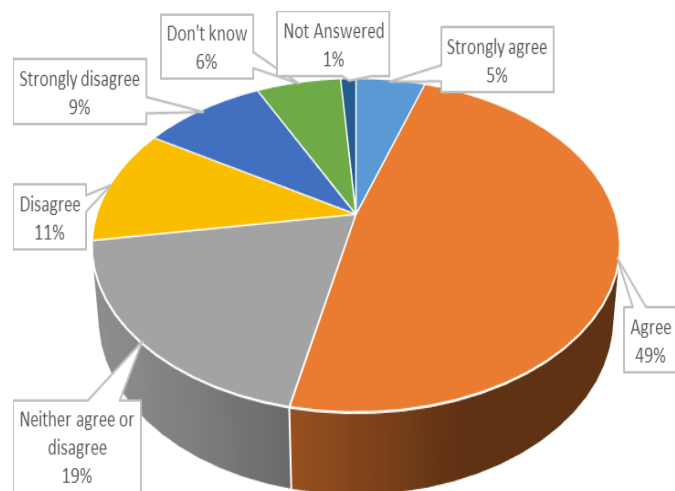
- A number of respondents welcomed that the PLP is a statutory requirement and that it will bring consistency to how the information on pupils with SEN will be recorded.
- Many respondents felt the PLP contains too much information, and found the detail “overwhelming”. There were consistent requests for its content to be reduced so as to make it a workable document i.e. some teachers wanted the document to be used as a daily record for the child.
- Several respondents felt that the number of phase reviews of the PLP was not realistic, especially for those parents that had more than one child on the SEN register. It was also commented that the requirement for nursery schools to review the PLP at least termly would be too demanding and often unnecessary given the settling in period of Term 1.
- Clarity was requested on how the quality of PLPs will be monitored and assessed and it was recommended that the Education and Training Inspectorate (ETI) inspect schools in their ability to fulfil duties in the preparation and review of PLPs.
- Concerns were raised about the time it will take to complete the PLP for each child on the SEN register and calls for the PLP to be workload assessed alongside the role of the LSC. It was further suggested that completion of the PLP could be shared i.e. LSC, Head of Year etc.
- A number of respondents, especially from schools called for all teachers to receive appropriate training on the completion of the PLP.
- A small number of respondents felt that the PLP will be used by the EA as a mechanism to deny statutory assessments, and stated that there will be times when a child arrives at school with extremely complex needs and a fast track approach should be made available.
- A few respondents made the suggestion that it should be possible to record on a PLP the date that a request for support was made and indicate any delay and the reason for delay.

**Q9: Once a child with a statement reaches the age of 14, do you agree that the school process for the completion of the first transition plan is clear?**

**Department's proposal:**

The Department proposes that, given the first-hand knowledge of the child concerned, the school a child attends should prepare a child's first transition plan (as part of the annual review of a child's Statement during the school year a child attains age 14). A transition plan is completed in order to plan coherently for a child's transition to adulthood. Section 8 of the draft SEN Code sets out the procedure involved in the preparation of the first transition plan for a child.

This question was answered by 176 respondents; two respondents did not answer the question, however one of them provided comments.



Of the responses received the majority were content that the school process is clear and not too different than the current, however it is imperative that schools are

guaranteed to receive support from an EA Transitions Coordinator as this takes up a considerable amount of time for an LSC.

It was also commented that as a number of external agencies are involved in transition meetings it would be useful if these could take place on a digital platform rather than having to physically meet and that all agencies concerned need to work better together and create better opportunities for young people.

Summary of Comments Received (Online and by Email)

- A significant amount of responses highlighted the need for better co-operation between government departments and external agencies to offer appropriate advice in terms of further educational opportunities, academic and vocational;



better career advice and other options for those that require ongoing health support.

- In terms of support at transition meetings it was highlighted that if the young person has autism the staff involved in the meeting should have appropriate training to be able to communicate appropriately, likewise if the young person has a visual or hearing impairment, the staff should have appropriate training/awareness to be able to engage fully with the young person.
- Many respondents stated that transition plans will have no impact if schools do not have access to meaningful transition programmes, for example, joint placements, transition schemes into the work place.
- Concerns were raised by special schools in relation to a lack of provision to support pupils in special schools post-16 and post-19 when they transfer to Adult Services. It was strongly felt that multi-agency working is required to improve the situation.
- It was suggested that transition planning guidance in the draft SEN Code should advise how parents and young people can raise any concerns about transition plans and set out arrangements to facilitate such concerns being addressed and, where possible, resolved.

## Question 10: Do you have any other comments you wish to make on the draft SEN Code?

This question afforded respondents the opportunity to highlight any other areas within the Code that they wanted to express agreement with or raise concern. Some responses included information regarding other business areas within the Department of Education and operational matters pertaining to the Education Authority, these comments have been passed on to the relevant business area and are not included in the synopsis of responses below.

A significant amount of information was provided in relation to this question which have been summarised into the following key themes, it does not list all individual comments received.

Responses	Annual Review	Early intervention	Format of draft Code
Timing	Co-operation	Home Education	Training
Access to support services	EA Plan of Arrangements	Statutory assessment & statementing process	Inclusion

### Responses

A small number of respondents highlighted their concern that those responding outside of citizen space via email or post would not be counted or considered. The Department can confirm that all responses have been counted and comments fully taken into consideration.

Positively, the parental guides and easy read documents for children and young people were well received as a great idea to make the process inclusive.

### Timing

As mentioned in the introduction, several respondents commented that the timing of this consultation was inconsiderate in the midst of a pandemic, school closures and did not provide enough time to allow for full scrutiny of the documentation. The Department acknowledges these concerns, however as there has already been significant delay in bringing forward changes to the SEN Regulations and the associated Code of Practice and a number of critical reports have been published recently regarding the provision of SEN, the Department felt it could not delay issuing the consultations.

### Access to support services

While many responses agreed with the clarity of the draft SEN Code many comments referred to the current delays in getting relevant support and were concerned about the lengthy waiting lists in accessing appropriate services. Several schools felt that currently, the EA are not responsive enough and there needs to be change. Comments indicated that the EA should ensure that all relevant stakeholders are aware of the specific referral criteria for each service and that access to services should be based on the individual needs of the child rather than the resources available or associated costs. Responses highlighted that sufficient and appropriate resources allocated to schools in a timely manner is crucial to supporting pupils with SEN.

### Annual Review

A small number of respondents raised concern that additional steps in the annual review process of a Statement would incur delays and create additional workload while others commented that there was no reference in the draft SEN Code that a parent could bring independent support to the meeting, stating that this was 'unfair' and could place the parent at a disadvantage. There was also a call that parents should receive copies of all information and reports prior to the meeting so that they can consider and have time to prepare.

### Co-operation

Several responses indicated that there needs to be better collaboration and improved communication between education and health for the system to work but some

respondents welcomed the work ongoing to ensure that protocols and pathways are developed.

### EA plan of arrangements for Special Educational Provision

A small number of respondents felt that the draft SEN Code will only work if the EA is in a position to deliver the advice, support and guidance needed by the system and a clear transparent plan of arrangements for special educational provision is in place and published.

### Early intervention

A number of respondents, predominately from the early year's sector, commented that there should be greater emphasis on early intervention and more support available for those children who are not in school or in an early years setting. Respondents felt that there was no clarification as to how the LSC role would be carried out in Early Years however concerns tended to focus more on how these settings would be resourced to implement the draft SEN Code rather on the Code itself.

### Format of draft SEN Code of Practice

There was a broad range of comments on the draft SEN Code with many agreeing with the principles and the heart of what was outlined. While a few found it to be lengthy and detailed, comments were largely supportive and positive stating that it contained much important and useful information and overall was a good document. The structure and format was welcomed with the processes and timeframes clearly set out and the addition of flowcharts and checklists providing a useful tool and clear structure for schools. The maximum use of technology by all stakeholders involved in the process was also well received.

The guidance around working in a supportive partnership with parents and children to make sure the views of the child are heard was also acknowledged.

### Home Education

It was commented that elective home education does not appear in the draft SEN Code and that the guidance and Regulations issued for electively home educated

children with SEN must be crafted specifically to support those children. However they also noted that the legal responsibilities on schools do not translate directly onto parents who electively home educate, and the Statement of SEN was not created for the circumstances of home education and is not capable practically or legally of being applied in that setting.

### Statutory assessment and statementing process

With regard to the statutory assessment and statementing process respondents welcomed the graduated response of provision for children with SEN, with less stages and steps, improving clarity of provision for parents and other stakeholders. However, it was clear that there were concerns that this could only be achieved if all stakeholders work together, sufficient funding and resources are available and that the EA is in a position to deliver the appropriate support when and where it is needed.

### Training

A significant number of respondents felt that widespread training is crucial for all teachers to support the introduction of the draft SEN Code. Respondents said that currently, teachers do not feel adequately trained to deal with the ever increasing range of SEN and that for the new SEN Framework to be successfully implemented, it is vital that appropriate and relevant training is provided for all those involved. This includes Boards of Governors. Some responses indicated that currently, training for Boards of Governors is often difficult to access and not to an acceptable standard.

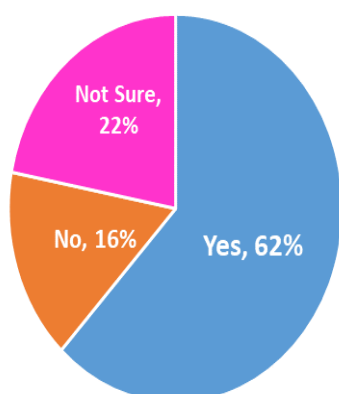
### Inclusion

It was suggested that the inclusion section of the draft SEN Code should be moved closer to the start of the Code and perhaps the section may be better split into several graded pieces to make it easier to access for the reader. It was advised that the inclusion section should be redrafted, putting the child's disability equality rights at the centre of the guidance, including for example updated case studies about how schools can make reasonable adjustments such as those from the 2005 supplement to the existing Code of Practice.

## SECTION 5 – FINDINGS – TARGETED CONSULTATION

### PARENTS CONSULTATION RESPONSES

#### Q1. Do you agree that the 3 Stages for special educational provision are clear?



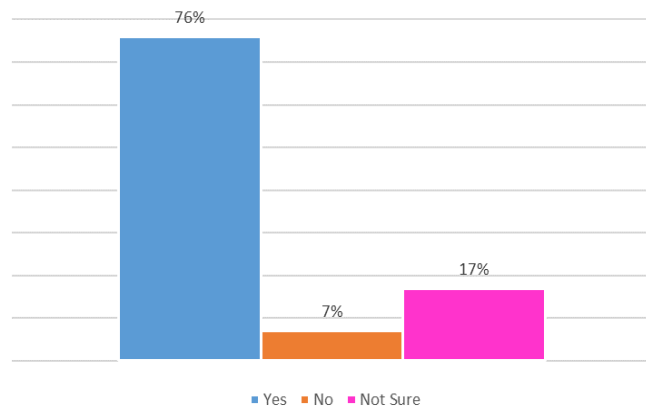
Of the 45 parents who responded to this question, 62% of parents stated that they agreed the 3 stages of the SEN process are clear, 16% said no and 22% were unsure. Broadly speaking comments positively reflected that the process was now more clear and condensed and therefore this would speed up the process.

While simplified, parents felt that there was still some ambiguity and further guidance and information is needed, especially around the criteria used and what they should expect. Parents also commented on the lack of support for children who are not at school or who are in an early years setting and the delays in accessing appropriate services.

Responses indicated that more support and a clear structure is needed to guide parents through the process with reference made to providing supporting evidence and representations. Parents commented on the inconsistencies in approach with some feeling that that it is a postcode lottery for support.

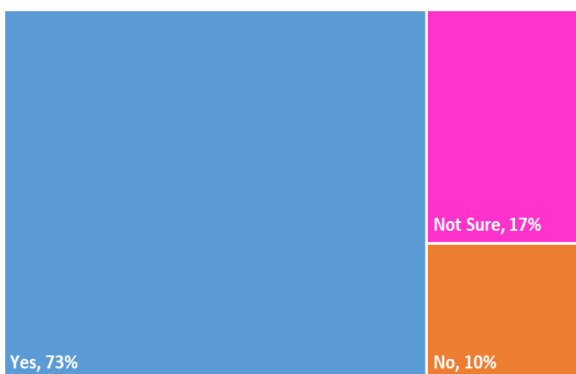
**Q2. Does the content of the PLP allow for a comprehensive picture of your child to be portrayed?**

The majority of parents (76%) were content with the PLP and welcomed that it was being standardised, with some parents shocked that the current Individual Education Plans (IEPs), that the PLP will replace, are not already standardised.



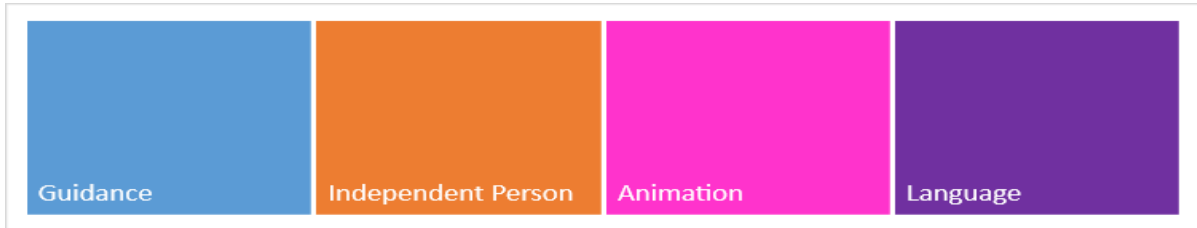
While it was appreciated the PLP would be the same in each school across each school phase, parents did point out the need to remember each child is an individual and it was also important to reflect on positive improvements as well as negative. A few parents commented that the PLP was very detailed with lots of information included about the child rather than on the child's need – this needs to be the focus. Others welcomed the details and commented that it will mean the school will be accountable with good discussion points for parents and teacher.

**Q3. Is the terminology used in the PLP clear and easy for you to understand?**



As you can see in the table opposite a high proportion of parents felt that the PLP was easy to understand however it was commented that this depended on who was reading it and that support should be provided to those parents that did not understand the terms.

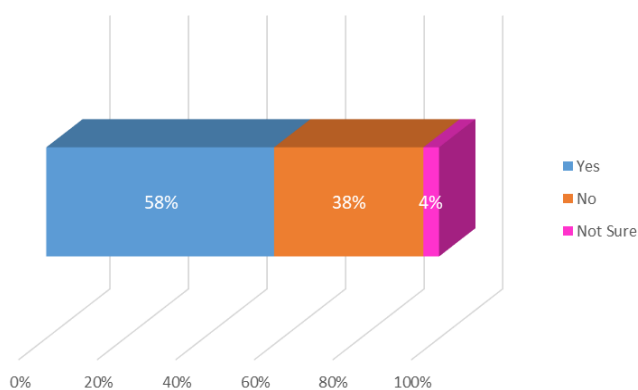
**Q4. What additional support materials do you think could be created which might help you better understand the purpose of the PLP and the processes surrounding it?**



In relation to this question, parents commented that clear guidance/information/fact sheets for schools and parents (some in easy read as parents have different levels of understanding) would be useful alongside a video or animation explaining jargon so parents can understand what everything means.

Parents also suggested that it would be useful to have a specific person that they could go to, to support them in understanding the purpose and use of the PLP in order that they could make the best decision for their child. It was appreciated that this could differ for every parent and possibly a meeting to ask what they need, might help them understand. Some parents also suggested an independent person to come on board other than school staff, to assist and offer help to parents and teachers on what to expect and guidance throughout, it means it would be a 360° approach to schooling.

**Q5. Does the PLP allow sufficient scope for you to share your views of your child’s difficulties and your aspirations for their future progress?**



The majority of parents agreed with this question however parents commented that the PLP appeared very target driven and should include more social aspects with organisations outside school as children can behave differently at home than at school. Parents also

commented that they would benefit from a parent’s guide or an easy read book to take



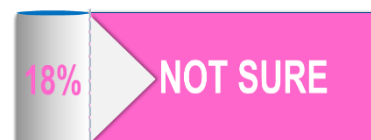
away, something that someone has sat down to write not a list of web addresses to look up.

**Q6. Are you content for the child's HSC (Health and Social Care) Number to be included in the PLP? Schools will only provide this if they are aware of the number following involvement from a Health and Social Care Trust – they will not go seeking it.**

The majority of parents (73%) had no objections but stressed that consent must be given before sharing it, clarification was needed as to why it was being collected, who would have access to it and it had to be held securely.



A small number of parents had concerns that it could mean that the school may get social services involved at every opportunity due to their possible lack of understanding of the child's needs and the information may be misused.



## Final Comments from parents

I really feel it is the luck of the draw depending who in the EA sees your file

This is an encouraging knowing that this is moving in the right direction and a widespread recognition that there may be standardisation for our children, from this I feel that it is going to be better

The principal should not be the SENCo

This can be a daunting process if you've never done it before

There should be a person employed to support parents

There should be a lot more training for staff

This should be a split consultation, one for mainstream and one for special – I feel special schools are forgotten about!

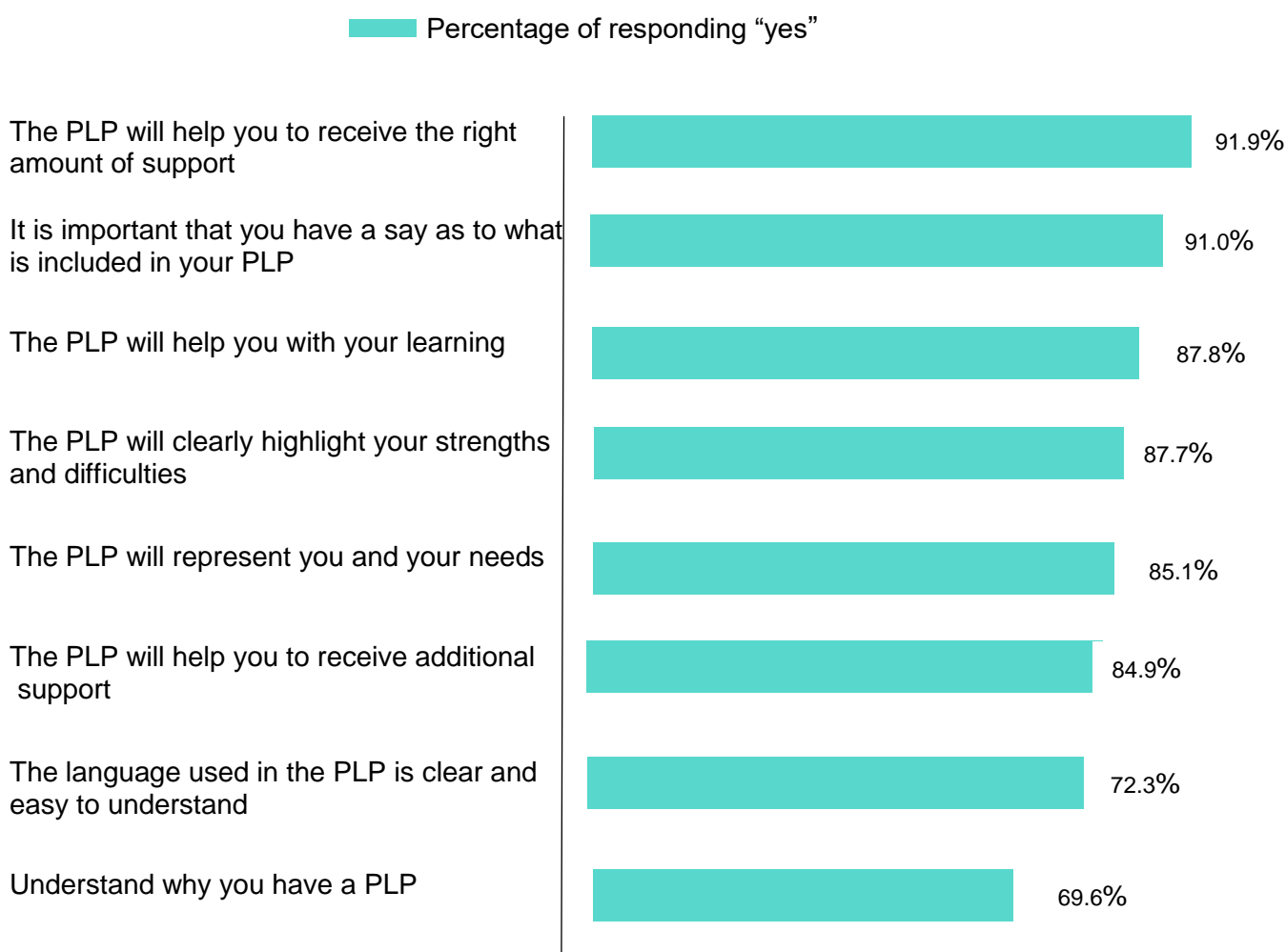
My issue is with what is said in an annual review and how sometimes that is not updated in my child's record

When the child is receiving a Statement there is part for supporting evidence for parent to complete with an A4 page, I filled this but then asked for some help and support worker and myself completed 5 pages with parent representations, there should be more guidance for parents on how to complete this with a structure to follow and what is expected of them

## CHILDREN AND YOUNG PEOPLE CONSULTATION RESPONSES

Children and young people were asked a series of questions and with responses being yes or no. The chart below shows the proportion of all respondents who made a positive response to each question that pertains to their perceptions of the key elements of their Personal Learning Plan (PLP).

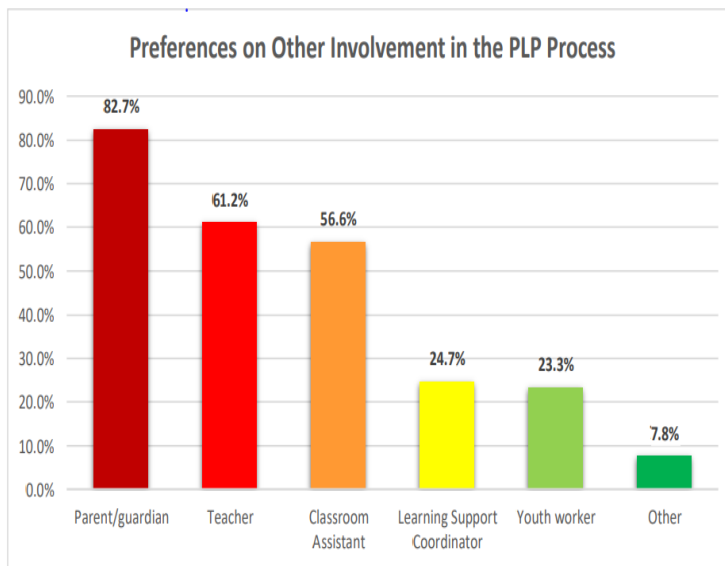
### Key Elements of the Personal Learning Plan



Whilst it was clear that respondents appeared to have confidence in all the key elements of the PLP and its processes, this confidence was not evenly distributed across all the key elements. Almost all of the children and young people surveyed agreed that the PLP would be of value in securing the right support for them and most also were also confident that it represented them, in constructive ways, helping them with their learning and the identification of strengths, weaknesses and additional

supports needed. Nearly all the children and young people believed it was important for them to have a say in the content of their PLP. The language used in the PLP was an issue for more than a quarter of respondents, 28% of whom did not think it was clear or easy to understand.

### Involvement of others in PLP process



This chart shows the people children and young people prefer to be involved in the PLP process, specifically on having an input as to the content of the PLP. It is notable that most young people (82%) saw parents as the most influential group who should have an input in this.

A majority (57-62%) also regarded teachers and classroom assistants as trusted adults who could support them. Almost a quarter of all respondents were in favour of their youth worker having an input though this finding needs to be placed in the context that only a limited number would probably have had any sustained engagement with a youth worker.

## Comments received from children and young people

I should have a say in my learning plan. It is going to affect my school life and my education

I deal with it every day and I hope I know what my strength and ability is, I feel that it is important and that I should be part of it.

*Because it is working around me. I think I should have a say in it.*

It shows what I am good at and what I am not so good at so I can try to get better at the subjects I am not so good at.

It shows me what I am good at and what I need help with.

Gives you more support and keeps up with your education

*Helps me to work better and find different ways*

## **SECTION 6 – RESPONSES TO THE EQUALITY AND HUMAN RIGHTS POLICY SCREENING, DATA PROTECTION IMPACT ASSESSMENT AND RURAL NEEDS IMPACT ASSESSMENT**

### **Equality and Human Rights Policy Screening**

The proposed new draft SEN Regulations and Code of Practice are key elements in a more robust SEN Framework that places the child firmly at the centre of the graduated response to meeting the needs of children with SEN. The Framework will strengthen the existing duties of the EA, Boards of Governors and health and social services authorities (including HSCT) to ensure that all children with SEN receive the educational support they need to allow them to achieve improved outcomes and fulfil their potential.

The SEN Framework applies equally to all children. In the new Framework provision continues to be based on the individual needs of the child and the measures put in place by schools and the EA to address those needs. It is anticipated that there will be a positive impact on all SEN children regardless of their disability or whether they have both SEN and disability. This positive impact will be as a result of more timely assessment and appropriate interventions by schools and the EA.

In particular, it is anticipated that the new rights for the child with a disability, who is over compulsory school age, to make an appeal of disability discrimination, in his or her own right, will have a positive impact. Similarly pupils with SEN over compulsory school age will be able to make a SEN appeal to Tribunal in their own right. Importantly they will have the lead relationship within the Framework in terms of liaison with schools and the Education Authority about their own special educational needs.

When the SEN consultation documents were issued, the Department published the Equality and Human Rights Policy Screening document. Only a small number of respondents commented on the content of this document.

Two organisations strongly disagreed with the Department's decision to 'screen out' the draft SEN Regulations and Code, stating that while they appreciated *"it is the intention of the Department that the proposals are universal in their impact and will apply to all pupils with SEN and disabilities equally, it is clear from the screening which has been carried out on the policy that not only is there potential for differential adverse*

*impact there is evidence of actual differential adverse impact...”, and there are “indications within existing data that Section 75 protected groupings are experiencing a disproportionately high incidence of SEN”. They felt that a full Equality Impact Assessment (EQIA) was required to fully assess impacts and then identify measures to be taken to prevent or mitigate against adverse impacts and to promote equality of opportunity. In doing a full EQIA they also advised that this should include a direct consultation with children and young people.*

One organisation welcomed that the Department had considered the impact on human rights in the equality screening, however noted that there seemed to be no mention or consideration of the specific rights and principles involved in human rights issues such as proportionality and necessity.

A further organisation recommended that the Department carry out a Child’s Rights Impact Assessment (CRIA), advising that this would ensure that the draft Regulations and Code are truly child’s rights compliant.

### **Department Response**

The Department has reviewed its Equality and Human Rights Policy Screening and has fully considered the likely impact of the new SEN Regulations and draft Code of Practice on the section 75 categories and on various human rights legislation. The new SEN Framework is set in the context of a well-developed inclusive educational policy environment. An underpinning aim of the revised Framework is that the educational needs of all children with SEN should be addressed and that the children should be integrated fully and accepted by all on an equal basis into the life of the school; the Department believes the new SEN Framework promotes equality of opportunity for all.

### **Data Protection Impact Assessment**

The Department carried out a Data Protection Impact Assessment (DPIA) on the new Personal Learning Plan (PLP), as a PLP will in the future be created for every child who has SEN and is recorded on the school’s SEN register. New activities that involve collecting and using personal data can result in privacy risks. The DPIA is a process to help systematically analyse, identify and minimise these risks. The result of the

DPIA was that a number of potential privacy risks and corresponding mitigating actions were identified. The Department included the DPIA as part of the consultation and welcomed any comments or views.

No respondents to the consultations provided comments on the DPIA, however comments were provided during a meeting which we feel it is important to mention. While it was agreed that the DPIA was generally clear on what the processing is and why a DPIA was carried out, it was advised that the DPIA's risk assessment section should contain more detailed information on all the possible risks to personal data identified from the processing and what mitigations have been or will be put in place to address those risks. Consideration should also be given to whether all information fields contained within the PLP are necessary and essential; any information that is not relevant or required should not be collected to ensure compliance with the data minimisation principle. It was also noted that the DPIA should be clearer on the privacy information which will be communicated to parents and children to ensure they are aware of how and why the information contained within the PLP will be processed.

### **Department Response**

The Department will review its DPIA and update as necessary. It will also ensure that no information is collected on the PLP that is not absolutely necessary and will update the relevant sections of the draft Code.

### **Rural Needs Impact Assessment**

A Rural Needs Impact Assessment (RNIA) was carried out and included as part of the consultations. It concluded that the draft SEN Code (and SEN Regulations) will not have any material impact on the social and economic needs of people in rural areas. One response disagreed that the new SEN Framework will impact positively on children and young people whether in rural areas or otherwise. It stated that rural schools often find themselves with fewer resources compared to urban schools and requested that consideration is given to the additional challenges caused by implementing the changes to SEN Regulations in rural schools.

### **Department Response**

The Department notes this response.



## **SECTION 7 – NEXT STEPS**

The Department is currently considering the changes proposed to the draft Code of Practice. Any changes to the draft SEN Code of Practice are dependent on and subject to, finalisation of the associated draft SEN Regulations.

### Legislative process

The draft SEN Regulations are part of a separate consultation and are subject to draft affirmative resolution in the NI Assembly, also known as affirmative procedure. In accordance with this procedure the Department will engage with the Assembly's Education Committee on the responses to the consultation process and on proposed changes to the draft Regulations as agreed by the Minister.

When the process with the Education Committee is complete, a final set of Regulations will be laid in draft before the Assembly and a motion of approval raised by the Minister. The draft Regulations will be subject to a debate in the Northern Ireland Assembly. If approved by the Assembly, the Regulations will be made and come into operation on a date to be specified.

### Draft SEN Code of Practice (draft SEN Code)

The draft SEN Code reflects the statutory duties and obligations detailed in legislation and provides guidance on how this is implemented in schools, the EA and other partner bodies. Once the Regulations complete their legislative journey through the Assembly and are made law, the draft SEN Code will be amended to reflect the required changes as appropriate. When the draft SEN Code is finalised a new Code of Practice will come into operation on a date to be specified and will be available on the DE and EA websites.

**STAKEHOLDER ENGAGEMENT**

As part of the consultation process, the team met with a number of organisations to discuss the proposed changes to the SEN Regulations and draft Code of Practice. Those organisations are named below.

<b>Organisation</b>	<b>Date of Meeting</b>
NI Commissioner for Children and Young People (NICCY)	4 November 2020
Teaching Unions	5 November 2020
NI Human Rights Commission (NIHRC) and Equality Commission for NI (ECNI)	6 November 2020
Children with Disabilities Strategic Alliance (CDSA)	10 November 2020
Non-teaching Unions	10 November 2020
Children's Law Centre	24 November 2020
Joint Consultative Forum	27 November 2020
Education Committee	2 December 2020

## RESPONSES RECEIVED TO THE CONSULTATION

### Individuals

68 individuals responded to the consultation.

### Schools<sup>3</sup>

Abbey Community College	Longstone Special School	
Ballycarrickmaddy Primary School	Loreto Grammar School Omagh	
Ballymacrickett Primary School and Nursery Unit	Mercy College Belfast	
Ballymoney High School	Millburn Primary School	
Ballynure Primary School	Nettlefield Primary School	
Banbridge High School	Oakgrove Integrated Primary School	
Barbour Nursery School	Omagh Integrated Primary School	
Belmont Primary school	Orritor Primary School	
Birches Primary School	Parkgate Primary School	
Black Mountain Nursery	Parkview Special School (SLT response)	
Blessed Trinity College	Roe Valley Area Leaning Community (representing 6 scho	
Board of Governors and Staff of St Patrick's Primary School (Ballygalget)	Saint Fanchea's College	
BoGs and staff of St Patrick's Primary School	Saint Patrick's Primary School	
BoGs response for Convent of Mercy Nursery School (Downpatrick)	Silverstream Primary School and Nursery Unit	
Brownlow Int College	Sion Mills Primary School	
Carrickfergus Academy	St Francis' Primary School	
Clarawood Special School	St James's Primary School and Nursery	
Coleraine Grammar School	St John's Primary School (Middletown)	
College Farm Nursery school	St Joseph's College	
Craigavon Senior High School	St Joseph's Grammar School	
De La Salle College (Belfast)	St Joseph's High School (Crossmaglen)	
Downpatrick Nursery School	St Joseph's Primary School	
Dromintee Primary School	St Joseph's Primary School (Crumlin)	
Dundonald Primary School	St Mary's Primary School	
Earlview Primary School & Nursery Unit	St Mary's Christian Brothers' Grammar School	
Edenderry Primary School (Banbridge)	St Michael's Primary School	
Edmund Rice College	St Patrick's and St Brigid's College	
Fairview Primary School	St Patrick's College (Dungannon)	
Fane Street Primary School	St Patrick's High School	
Gaelscoil an Chaistil	St Patrick's Primary School & Nursery Units (Dungannon)	
Gaelscoil Eoghain (Cookstown)	St Patrick's Primary School (Glenariff)	
Gaelscoil na mBeann	St Pius X College	
Hart Memorial Primary School	St Ronan's Primary School	
Holy Cross College	Strabane Primary School	
Holy Cross College (Strabane)	Strandtown Primary School	
Holy Family Primary and Nursery School (Derry)	Tor Bank Special School	
Holy Trinity College	Willowbridge School	
Limavady High School		

<sup>3</sup> Some Schools submitted more than one response

## Other Organisations

Angel Eyes NI	Home Education in Northern Ireland
ASCL Northern Ireland	Intellectual Disability CAMHS
Association of Educational Psychologists	Literacy Service (Education Authority)
Autism NI	Mencap
Belfast Health & Social Care Trust	Mid Ulster District Council
Belfast South Community Resources	NAHT(NI)
Camphill Community Glenraig	National Association for Special Educational Needs (nasen)
CCEA	NASUWT
CCMS	National Autistic Society Northern Ireland
Children with Disabilities Strategic Alliance	NICCY
Children's Law Centre	NIHRC
City of Armagh High School BoG	Parkview Special School (BoGS)
Comhairle na Gaelscolaíochta	Royal College of Occupational Therapists
Community Child Health, Belfast Health and Social Care Trust	Royal College of Speech and Language Therapists
Controlled Schools' Support Council (CSSC)	Royal National Institute of Blind People NI
Department for Communities	SENAC
Early Years the organisation for young children	Shine
Education Authority Children and Young People's Services	Southern Health & Social Care Trust
Equality Commission for Northern Ireland	Special Educational Needs Advice Centre (SENAC)
Fermanagh and Omagh District Council (Council)	The Irish National Teachers' Organisation
Governing Bodies Association	The National Deaf Children's Society
GTCNI	Transferor Representatives Council
Guide Dogs NI	Ulster Teachers' Union
Health and Social Care Board - Public Health Agency	Western Health & Social Care Trust
Home Education in Northern Ireland	