

Public Accounts Committee

Oral evidence: DfE Recall—SEND Review, HC 26

Wednesday 11 May 2022

Ordered by the House of Commons to be published on 11 May 2022.

[Watch the meeting](#)

Members present: Dame Meg Hillier (Chair); Shaun Bailey; Kate Green; Angela Richardson.

Education Committee Member present: Tom Hunt.

Gareth Davies, Comptroller and Auditor General, National Audit Office, and David Fairbrother, Treasury Officer of Accounts, HM Treasury, were in attendance.

Questions 1-65

Witnesses

I: Susan Acland-Hood, Permanent Secretary, Department for Education, Indra Morris, Director General of Families Group, DfE, Stephanie Brivio, Acting Director of Special Educational Needs and Disabilities and Alternate Provision, DfE.

Report by the Comptroller and Auditor General
Support for pupils with special educational needs and
disabilities in England (HC 2636)

Examination of witnesses

Witnesses: Susan Acland-Hood, Indra Morris and Stephanie Brivio.

Q1 Chair: Welcome back to the Public Accounts Committee on 11 May 2022. We have called back the Department for Education to discuss the special educational needs and disability review that was published at the end of March, and other related issues, particularly school funding. I will ask Kate Green to kick off once I have introduced the witnesses. We have the permanent secretary at the Department for Education, Susan Acland-Hood. We have Indra Morris, director general of children's services in the communications and strategy group at the Department for Education—the titles get longer and longer each time you visit.

Susan Acland-Hood: We have just changed it. She is director general of families.

Indra Morris: It is one word.

Chair: That is much sharper. Ms Acland-Hood, you win a point from the Committee for shortening civil service titles. We also have Stephanie Brivio OBE, the acting director of special educational needs and disabilities and alternative provision. Are you still acting director?

Stephanie Brivio: I am, yes.

Chair: Over to Kate Green.

Q2 Kate Green: Thank you very much, Chair. It was six weeks after the publication of the original SEND report before the accessible easy read version became available. Do you think that was good enough, Ms Acland-Hood?

Susan Acland-Hood: No, I think it would have been much better if we had been able to do it more quickly. I am really pleased that we put out the accessible, easy read version along with the sign language versions and with a set of other accessible versions we published earlier. Steph, do you want to talk a little bit about the accessible versions?

Q3 Kate Green: We know what they are. The people who need to read or access them know what they are. Was it respectful to people who need that kind of presentation of the material that they received it six weeks after everyone else?

Susan Acland-Hood: What we were determined to do was make sure that we had a really wide range of accessible formats available for people. We knew from the start that they were going to have to wait until the final text



HOUSE OF COMMONS

was finished before we could give them to contractors to turn them into the accessible versions, but it did take longer than we had hoped for some of those versions to come out. That is why we have extended the consultation by three weeks, in order to make sure that people have a really good opportunity to comment and feed in.

Q4 Kate Green: Would you like to apologise to the people who waited an extra six weeks? I appreciate they now have an extra three weeks at the end, but they have lost some of the time that was available to other families to comment.

Susan Acland-Hood: Yes, I am really sorry to anyone who has waited for the accessible version and I really hope people will use them now and have a say. We are keen for as many people as possible to have a say on the Green Paper.

Stephanie Brivio: Just to add, we are now ratcheting up the number of events that we are holding and are going to include more events with young people and families so that they will be able to have their say. That is part of the three-week extension.

Q5 Kate Green: The 2014 reforms were introduced with an expectation in the Department that benefits and savings would outweigh the costs of the new system. Local authorities have said that the Department didn't recognise at the time the full cost of the 2014 reforms. Do you accept that that created delays in parents being able to obtain support and assessments for their children and left them feeling that their expectations of the support they would get were unfulfilled?

Susan Acland-Hood: There is a lot we have learned from the experience of the 2014 reforms. A lot of people would say that they recognise the good intent behind the 2014 reforms. They were created in partnership with a lot of people across the sector. The thing that I would identify and that we have set out in the Green Paper is that we didn't spend long enough and think hard enough about the practical implementation of those reforms and how we could make sure that the intent was followed through. We are really trying to learn that lesson from this review.

We have spent a lot of time through this review making sure we really understand the incentives and drivers in the current system and why and where those are not working as they should. Some of that is about funding, but we have seen funding into the system increase and increase. The challenge is that people's satisfaction with the way the system is operating is not improving. Only some of this is about increasing the funding quantum. A lot of it is about trying to make sure the funding is applied in a way that really works for the children and families in the system. That is why we have spent real time trying to work with partners on understanding those drivers.

Q6 Kate Green: Is that why it took so long to produce the review? It was substantially overdue from what was originally expected.

Susan Acland-Hood: I think it is one of the reasons, but there were three main reasons. The first was that intent to make sure we really did



HOUSE OF COMMONS

understand the drivers and the underpinnings of the system. I would like to take the opportunity to thank the many, many parents, children, representative groups and others who worked with us on the Green Paper, whom we were also working with through the consultation and want to work with beyond.

The second reason—I appreciate the Committee will have some impatience with this—was the pandemic, not because people were not able to do good work in the Department during the pandemic, but because we had to divert people from doing some activities to doing things that the pandemic needed doing urgently.

The third reason was that, as we came out of the pandemic, the context had changed. We had to make sure that the early work that we had done on the drivers in the system recognised and kept up with the context as we see it now. It meant we had to go back round and do a little bit of that work again to make sure it was still live and current.

Q7 Kate Green: I appreciate that. This is only a Green Paper. Indeed, I believe it has been described as a very green Green Paper—perhaps by you, Ms Acland-Hood. Do you think that, from where we stand now, sufficient work has been done so that parents can have more faith in the success of these reforms compared with the 2014 reforms?

Susan Acland-Hood: Yes, I do. I don't want to be complacent about that, because it takes really hard graft by us and lots of other people across the system. Again, we think this is going to have to be something we work on in deep partnership—not just the co-creation with parents that we want to put at the heart of the SEND system at every level, but really mature and deep partnership with people who are going to deliver at all levels of the system.

I don't want to be complacent about it, but we really are trying to build in that thinking about delivery from the beginning—identifying resources to help people think about delivery and establish, for example, a national SEND delivery board that is set out in the paper to put together the people who will have to make this work in practice. I don't think any of us thinks it is a question of publishing the Green Paper and then there is a sort of smooth slide into perfect execution. It will take graft from everybody involved to keep refining, working, testing, learning and going at it every day.

Indra Morris: For me, there are two fundamental differences as well from 2014. One is that we spent a lot of time trying to get underneath not just the what but the why. What are the root causes of the issues? Secondly—this is key for implementation—is the importance of clarity and consistency. A number of local authorities and others have said we were not clear enough about what “good” looked like, and that has to be a key difference now.

Q8 Kate Green: Taking that forward, can you clarify for us exactly what you as the Department are going to be accountable for as the regulator of the SEND system, and what accountabilities other players in the system will have?



Indra Morris: Ultimately, we are accountable for these reforms in the light of how we take them forward and in light of the consultation, delivering the outcomes and improvements both for the children and their families and their experiences. Ultimately it sits with us working with our partners, and it has to be a team effort across the system and the sector. Accountabilities also sit with local authorities as part of the national standards and the inclusion dashboard. All the building blocks are about baking in the clarity and accountability in health and in schools, and having that accountability at both the local and the national level in a way that doesn't happen today, and in a much more timely way as well.

Q9 **Kate Green:** So if any element of the partnerships that you are describing isn't achieving what it needs to achieve in order for the national ambition to be achieved, is it your responsibility as the Department to take action to address that?

Indra Morris: Yes, and we will work with the national delivery board, which provides leadership from their sector and challenge in terms of how the reforms are delivered, and impact. So it's not just about delivering what we say but getting the results and asking ourselves over time, "What improvements are we seeing in the system? How is this having an impact on the experience of parents who, as everybody knows, too often find the system bewildering and adversarial?"

Stephanie Brivio: The new regions group will be able to look at the local inclusion plans that the SEND partnerships put in, and challenge back to those local partnerships about whether their plan is on track for delivery. Because we are bringing in that regions group, a number of key components—including the SEND specialists and people there—mean they will be able to have those conversations in the round and have much greater accountability between the Department, the local authorities and the wider SEND partnerships.

Ultimately, however, at the beginning the Department will be responsible for setting up that national delivery board and for working with it on delivering the national standards, against which we will hold the SEND partnerships to account.

Q10 **Kate Green:** Can I move on to the intention to digitise the education, health and care plan, or EHCP, process? What are the benefits of doing that? And for families for whom digitisation may be a challenge, what steps are you taking to ensure that they are not left behind and can communicate the needs of their children?

Stephanie Brivio: The whole of the process around education, health and care plans is all about co-production, and we still expect—again, as part of those SEND partnerships—parents to be represented on the board and to be part of it.

What we hear at the moment from parents is that there is no consistency about how those education, health and care plans look. We have very different approaches. In one local authority, it could be 58 pages and in another it is 10 pages. What parents are not getting is a real sense of, "What



HOUSE OF COMMONS

actual support am I getting to meet the actual need of my child?" That need is not necessarily always defined well enough. So we hope to have some standardisation, so that parents can then know what the expectation is from their education, health and care plan, and know what the local authority will have to put into that plan. That will be produced with them, their schools and their teachers.

On digitisation, children move schools and move throughout the system. It will be much, much easier for schools to know and see, quite visibly, what needs a child has. We know that children move from primary to secondary; that transition is very difficult. With the digitisation, we will be able to improve that advance notice, so that children will have the support as and when they make those transitions.

Q11 Kate Green: Will parents expect to engage directly with the digitised plan? Will they access the plan in its digital form?

Stephanie Brivio: Yes, absolutely, and we would want to talk to them about the best way to do that. However, it is a child's plan at the end of the day; it is that young person's plan. We want this whole reform system to make the experiences of children and young people much better.

Susan Acland-Hood: I think we want to use exactly the same principles that we use across the rest of Government as we move towards digital services, which is to recognise that for many people digital services work really well and are really convenient, and are a huge improvement in terms of accessibility and ease of use. Again, we would make sure those services met the Government digital standards, to ensure that people can access them on any device, and so on.

However, we also know that there is a group of people for whom digital is a barrier and a problem, not an aid. Again, I think the answer to that is not to create a kind of massive, parallel, non-digital system but to make sure that you have routes in and out of digital that work for people who want to do particular things in a paper version.

Q12 Kate Green: Have you developed the IT to do this yet?

Susan Acland-Hood: Not yet, no.

Q13 Kate Green: What sort of timescale do you think you will need to do so?

Stephanie Brivio: I think we will be looking at what comes out from the consultation, and we will talk about that in the delivery plan.

Indra Morris: Also, some local authorities are doing a variation on this as well, so there is obviously the option of looking at some of the things that exist and considering to what extent they are fit for purpose, depending on what—

Q14 Chair: So it may not be one big central Whitehall data thing; there could be different things.



Indra Morris: Yes, but with consistency. That is really important. One of the criticisms, as you know, in 2014 was that we sort of let a thousand flowers bloom, but not in a good way.

- Q15 **Angela Richardson:** I had a meeting with political leadership and senior officers at Surrey County Council last week. They said that they are seeing a post-covid increase in the number of EHCPs being applied for. Is that being fed back to you from several top-tier authorities? Given that this is a £9 billion cost to the taxpayer at the moment, and that we will not be able to implement for a long time the Green Paper that you are putting forward, are you expecting some of those children's needs to be taken care of with covid catch-up, covid recovery and the national tutoring programme, or will you look at getting additional funds to look after the identified needs of those children?

Susan Acland-Hood: I will start and then ask Indra to come in. Growth in EHCPs is definitely something that we have heard. I think I am right in saying that it is a bit early for us to have—

Stephanie Brivio: Hard data, but we certainly have been hearing about that.

Susan Acland-Hood: That is something that we are hearing and attending to. We did of course get an extra £7 billion for the school system in the SR, of which £1 billion is for high needs, so there is more money going into the system anyway. Whether the covid catch-up provision can really help some of those children depends hugely on the individual circumstances and needs, and on what needs are identified through the EHCPs. I think, for many children, it will be helpful. We have also made sure that we have dedicated catch-up funding for children with SEND and in specialist settings—that is part of the overall funding amount.

The other thing worth pointing to is some of the work that we have been doing through the safety valve intervention programme and now through the broadened delivering better value programme, which are essentially about working with the authorities that have high needs budgets and are under the greatest pressure to help them do things that meet more people's needs more effectively, including meeting people's needs without them necessarily needing to go through the process of a plan. So, in some ways, it is a mini version of the bigger narrative set out in the White Paper.

We know that by taking preventive action and meeting more needs earlier through better-quality inclusive mainstream provision, we prevent people from ending up in that escalating scale of need that gets very expensive very quickly. If we can break that cycle, it also helps local authorities to invest in the work that helps to avoid that kind of more expensive downstream work.

Look at examples of what we have done through the safety valve programme. In Rotherham, they have used some of that support to help mainstream schools to adopt more inclusive practice and help more children remain in mainstream settings. In Salford, they have put in an advice line



HOUSE OF COMMONS

for SENCOs, SEND staff and support staff to apply a graduated approach, using the thrive model at the early stage, which helps more children to be supported earlier and better. In Merton, they have strengthened professional networks across mainstream settings to help increase their confidence in meeting children and young people's needs, including by articulating school-level inclusion standards and so on.

Q16 **Chair:** Will you be assessing how those different models deliver results?

Susan Acland-Hood: Yes.

Q17 **Angela Richardson:** I will try to make my questions quicker, Chair; there is quite a lot to get through. Moving back to the Green Paper, why will new SEND partnerships be more effective than existing arrangements for inter-agency working?

Susan Acland-Hood: I will bring in Steph in a minute. It is quite important that the proposals in the Green Paper are a whole. They will be more effective partly because they will be nested in a system that has as a starting point the national SEND standards we talked about earlier. They will have something to work to that means that there is some consistency about the offer being made, and they will be able to work together around that rather than effectively being asked to make it up from scratch, which is much harder for a multi-agency group.

Stephanie Brivio: Basically, the local authority will convene those, but it is very much multidisciplinary, as you say. We are conscious that there are other partnerships around; this is not starting from scratch. We know that local areas will already be looking at their joint strategic needs assessment and what that will bring into that partnership. Also, as Susan said, the national standards will be driving what their local inclusion plan looks like, and, as we said before, they will put that into the Department and we will hold them to account, as will the new area SEND inspections, which will look at how the partnership is functioning in delivering the best outcomes for children and young people.

Q18 **Angela Richardson:** How confident are you that local authorities will have the capacity to implement your proposals successfully? I deal with many local authorities that struggle to deliver their current services, let alone take on board something like this.

Susan Acland-Hood: I talked at the beginning about making sure we are building thinking about delivery and implementation into the plan, and we have set aside £70 million to support delivery and implementation. The first answer is that we want to put resource behind helping people do this. We are not giving local authorities a whole new task; we are trying to help them manage a task that they already have, which is challenging, in a better structured and more helpful way.

We think the national standards and the frameworks around them will make the job more doable for a local authority. As I say, we have examples of things we have been doing through the safety valve and the Delivering Better Value in SEND programmes that show the kind of things we can do



HOUSE OF COMMONS

when there is help to start making that kind of shift out of the vicious cycle and into the virtuous one, and moving a bit more towards more inclusive and preventive activity. That helps reduce the need for high costs later in the system. It will be a learning activity as well. We want to work, learn and iterate with local authorities.

Chair: So you have evaluation built in.

Susan Acland-Hood: Yes.

Indra Morris: For me, it is also about this providing a road map out of the cycle that a number of local authorities know they need to break out of in a more positive way and—going back to the point about accountability—challenging those who are not in that space yet. It is also important that we recognise that there is some very good practice out there in schools, nurseries—I have seen some brilliant ones—and local authorities that are doing this well. It is also about showing what is possible and challenging others to step up. We will play a forward-leaning role in making that happen.

Q19 **Angela Richardson:** Kate briefly touched on the digitisation of the EHC plan process. How will you reconcile having a standard EHC plan template with the imperative to meet children's individual and specific needs?

Susan Acland-Hood: The standardisation is of the plan, not of what is in the plan, if that makes sense. As Steph said, we see huge variation at the moment between authorities, not just in the length of the plan, although that is an easy thing to talk about, but in the extent to which it says something concrete, specific and helpful about what will be done to meet a child's needs. The standardisation is partly to help speed things up and make sure we can spread best practice well around the system, and partly to make sure the way the plan is organised and structured is as likely as possible to make sure that what is written in it is specific and helpful and ensures the child gets something that is good for them.

Q20 **Angela Richardson:** On the digitisation, we have talked a little about the IT system, which hasn't been set up yet. Who is going to pay for it?

Susan Acland-Hood: As we said, the first stage is to make sure we go through the consultation and listen to what is said. Sorry, we are talking quite a lot as though this is—

Chair: We know that. The question about money is always the one we want to go for.

Susan Acland-Hood: We are building that into our thinking about the implementation costs. It will depend a bit, as Indra said, on whether we end up using something that is already out there in the sector that we can develop.

Q21 **Chair:** Is that expected to be paid for at a local level, or is it something that Whitehall will fund? Will it be an extra burden for local authorities?

Indra Morris: It will depend. We will have to look at the costs alongside the delivery plan—who pays for what, how it fits with existing funding and

so forth. That will become clear as we work through those choices. We haven't decided yet.

Q22 **Chair:** You haven't got a ballpark idea of what the costs will be?

Stephanie Brivio: No. We are looking at what other local authorities and other areas are doing, so we will be able to compare when we get stuff back from them.

Chair: It's just that it would be a great shame if it were top-sliced from local authorities' existing special needs budgets. I know that my own in Hackney is already overstretched and self-subsidised. We are glad you are thinking about it, but we are perhaps not reassured by the answers just yet.

Q23 **Angela Richardson:** Ms Morris, how will you use the inclusion dashboards to oversee the performance of schools and local authorities?

Indra Morris: It is important that we recognise that the dashboards are going to be used in a number of different ways. One is at the national level, and we have already talked about that. We are thinking about whether we are shifting the dial, and whether the different experiences, and the performance of the data and the system, are improving over time. There is a discussion, of course, as part of the consultation about what the metrics in the dashboard should be. So there is that national partnership view.

It is really important that this dashboard is used locally and that it is transparent and accessible, so that it should be used locally to inform, hold to account and to have a debate about performance, but also provision. We also expect it to be used individually by different parts of the partnership—health, education and care—in a number of different ways, and it really needs to link well together.

Q24 **Angela Richardson:** You will be looking at what key measures will tell you whether it is working effectively.

Indra Morris: Yes, exactly.

Q25 **Angela Richardson:** Ms Acland-Hood, what have you done to understand the reasons for the variation between different groups of children in identifying SEND, as we recommended in 2020?

Susan Acland-Hood: I might bring other colleagues in. We have done a lot of work as part of the review to look at some of the differences we see, between groups of children and between areas. We see very different rates of SEND identification in different parts of the country at the moment. We understand some of the drivers; I think it is still true to say that we don't understand all of the drivers.

It is difficult, because it is very circular. Part of the identification is the description of the need, so it is genuinely hard to find a different yardstick by which to test whether the identification and the need meet each other—do you see what I mean? Steph, I don't know if you wanted to say something about that. As part of the work on the review, we have done quite a lot on differences, including things like gender and background, and by geography.



HOUSE OF COMMONS

Stephanie Brivio: As Susan said, we see quite a bit of variation. The 2014 reforms went to a 0-25 system, so we are seeing post-16 children with education, health and care plans—that is sort of creating many more of those plans in the system.

What we are seeing is more diagnosis of autism in primary schools and then, in secondary schools, more diagnosis of social, emotional and mental health needs. We are trying to understand a little bit more about how that is playing out, because in some local authorities, that identification is much lower. It might be that some of those needs are being met in mainstream provision—we are seeing some really good examples. I visited a school recently that is very inclusive of a range of children with special educational needs. It is working with alternative provision and bringing in experts, so that children can remain in mainstream. But I think there is a bit more work to do. We are going to be working with the Department of Health and Social Care, looking at how we get some better identification.

Q26 **Angela Richardson:** Ms Acland-Hood, your Treasury minute response to our report said the analysis of the variation would be published alongside the SEND review. When are you planning to do that?

Chair: Ms Morris? The permanent secretary is looking at you.

Indra Morris: I am sorry; I need to get back to you on that.

Chair: It is disappointing when something is promised here and it doesn't happen. We do keep our beady eye on these things.

I am delighted to welcome Tom Hunt, who is guesting on our Committee today—a very welcome guest from our sister Committee, the Education Committee. Over to you, Mr Hunt.

Q27 **Tom Hunt:** Thank you very much, Chair. Do you think that mainstream schools are adequately incentivised to attract as many special educational needs pupils as possible?

Susan Acland-Hood: I think most schools are staffed by lots of people who would want to do the best for as many children as possible. I do think incentives in the system are important, but we need to be slightly careful of building a model that doesn't account for people's good will and good intent.

We do hear concerns about that. The first level of concern we hear is how well equipped people feel to deal with different types of special educational needs and disability, and how well supported they feel by the systems around them. That is what sits behind some of the provisions in the Green Paper around better training for staff to help them to use best practice.

One of the important bits of the proposition for national standards is that, as well as setting out what you would expect at different levels of more serious need, they would set out what a reasonable expectation should be, not just of what a mainstream school should be able to offer but of what they should expect to be able to have around them to support them in making that offer—things like speech and language therapy and educational



HOUSE OF COMMONS

psychology provision, which we know are very difficult. Schools will tell us they cannot get access to enough of that to support children in their schools.

On the incentives, the third thing that is sometimes raised with us is performance tables. Often, schools will express this about other schools, rather than about themselves. They will say, "Other schools do not take children with special educational needs, because they are worried about how they will do in performance tables, but we do, and that penalises us." We have an item in the consultation that asks questions about changes to performance tables to help us recognise that better.

Q28 Tom Hunt: There is a new Ofsted framework, which I understand could improve the situation. I take your point about good intentions—I do not doubt the good intentions of everyone who works in the school system—but I have spoken to people in the school system who sometimes feel there is a conflict between wanting to do the morally right thing and, not unreasonably, wanting to be professionally successful. It is about trying to take that conflict away, and there is obviously the financial aspect as well.

I welcome the push for more SEND specialists. That is good news, but I was worried by a statistic I saw recently—that only 40% of regular teachers feel as though they are adequately supported to be able to support young people with learning disabilities. I was wondering if there are going to be some changes to general teacher training. Yes, we need more specialists, but I also think we need to get to a point where every single teacher has a base level of understanding of every single different type of learning disability, so we can help spot it and also help to support those people who are unconventional thinkers.

Indra Morris: In a way, it comes back to your previous question, and the potential to do more to support children with special educational needs in the mainstream classroom through good teaching. That is what you see in the really great schools. If we are improving the clarity of the expectation of the mainstream offer and the whole accountability regime—I point to the schools White Paper, which sends a very clear signal that inclusion is good—that also sends a really important signal to teachers about their professional development and what it takes to be a good teacher in the classroom, and that it is not simply for a specialist school or teacher.

Q29 Tom Hunt: But do you think there are some tangible, concrete changes that should be made to teacher training to help address the point I have raised? Is there any way in which you think it is not working as it should at the moment to ensure that every teacher has a sufficient level of understanding of different disabilities?

Indra Morris: Some of it is about encouraging teachers to take up existing opportunities and recognising that SEND is a mainstream teaching skill, not a job for somebody else. Also, the reforms we are proposing on alternative provision are really important, because an element of that is about helping to develop the skills and practice in mainstream schools, so it is not just seen as "This is something for AP" or "This is something for specialist" where those children can thrive in a mainstream environment.



Q30 Tom Hunt: I have one more question; if I've got time, I will maybe ask another quick one in a bit. Stephanie, you mentioned diagnosis of pupils with autism in primary school, and emotional and health disabilities in secondary school. You will be aware that Matt Hancock is looking to push a Bill at the moment that would screen every young person for dyslexia. I understand that there may be some differences of opinion about how it works best. Some people are concerned about labelling young people with dyslexia when they might not have dyslexia, and there has been a bit of debate about the right age to do it—I am hearing that eight might be the best age to do it.

I guess my position is that as it stands right now, it might not be perfect, but is there a desire in the Department to find a way of making it work? I know at first hand that some people do genuinely have learning disabilities that are more hidden, such as dyslexia and dyspraxia. I know from personal experience that it was only when I got diagnosed with dyslexia and dyspraxia that things went right for me, so this is incredibly important. I wanted to get an update from you about how you are working with him to try to make this a reality.

Stephanie Brivio: The first thing about working with Matt Hancock is that we are running a roundtable with him, our Ministers and a group of other people, to come and talk about this. That is being held at the end of May, and we have an absolutely open mind. As you say, there are different points of view about what might be the best approach. What we do know, though, is that children present as unique individuals. Dyslexia is an all-encompassing term, and one form of dyslexia might be slightly different from another child's, so our intention is that early identification will address your unique need. We want you to have the right response to it.

Q31 Tom Hunt: Will you look at dyspraxia as well?

Stephanie Brivio: We are looking across the piece at early identification of all needs. We are putting in £2.6 million, I think, for early autism diagnosis, and around 100 schools will be involved in a pilot looking at early identification in that space. We are very much looking forward to the conversations that we are having with Matt Hancock and others, and we will feed all that into the wider consultation before we come back.

Q32 Tom Hunt: A final question from me. In terms of the inclusion dashboards and the role that you and Ofsted will have in this, what would be the trigger point for you as a Department to decide that a local education authority just is not up to it, has failed too often and has let down so many young people that you have to step in and take direct action? In other words, will it have teeth?

Susan Acland-Hood: Yes, it will. But I think that, a bit in line with the approach we now take across the school system, we are much more likely to see inspection as the trigger for intervention than a pure number on a dashboard, because the number should be prompting us to ask really hard and serious questions. Sometimes there are good reasons for numbers that do not look very good on a dashboard, so it is important that the numbers trigger a really robust and good-quality conversation. As Indra says, that



HOUSE OF COMMONS

might be locally, nationally or both. Of course, the dashboards will be available to Ofsted and the CQC as well, but in general inspection would be the trigger for hard-end intervention, because that is a better, rounded picture of what is going on.

Indra Morris: One of the things that we are working on with the new regions group is how we use that in a ladder of conversation intervention.

- Q33 **Chair:** As we would see with local authority intervention across other Departments too. I am very interested and heartened to hear that the Department is working with Back-Bench MPs on developing legislation. Is that an open invitation to all Back-Bench MPs, or is there a particular framework under which Mr Matt Hancock is engaging with the Department through the Secretary of State?

Susan Acland-Hood: We try to be open and have good conversations with Back-Bench MPs and anybody who brings us a really good proposal.

Chair: I think there might be a flood of people coming your way, Ms Acland-Hood—from all parties. Thank you for that clarification.

- Q34 **Kate Green:** May I go back to Mr Hunt's question on incentives and disincentives, particularly for mainstream schools? School leaders tell me repeatedly that the biggest disincentive is having to find the first £6,000 of funding out of their school budgets. I think that you as a Department are meant to be reviewing that £6,000 threshold. Could you update us on how you are getting on with that work and why it hasn't formed part of the Green Paper?

Susan Acland-Hood: The intention was to make it part of the Green Paper or part of the wider work on school funding in the national fair funding formula. It is really hard to do pieces of the funding system in isolation, so the reason it has not come as part of this is because we want to make sure it is wrapped up coherently in the rest of the work on school funding.

- Q35 **Kate Green:** So will I see it in the Schools Bill when that is published imminently?

Susan Acland-Hood: You will see the nub of the bit of work in the Schools Bill. You will not see a finished plan.

- Q36 **Kate Green:** I am sure you will appreciate that schools are very mindful of the many pressures they face on the funds that they receive through the dedicated schools grant. Do you accept that that means the threshold is acting as a disincentive towards inclusion?

Susan Acland-Hood: Again, this is something about looking at the picture of the whole system as it works together. As we went through the SEND Green Paper, we thought long and hard about the proposition for national standards, because there is a tension there. There is something really important about consistency in the system, but there is also something about making sure we have sufficient flexibility, recognising that there are different needs in different places. But the more we look at it, the more we



HOUSE OF COMMONS

realise that it is a really helpful thing in addressing a whole set of issues across the system.

One of them is the notional SEN budget. On the one hand, if you have no level of need where you are saying to schools, "Look, we do think it would be reasonable for you to be able to do these kinds of things without going through a process to seek additional labelled funding", you essentially incentivise people to seek a label for literally everybody. There is something important about that bit of mechanism in the system.

The reason that it feels very difficult for schools at the moment is that the levels of expectation about what kind of need is met through that initial notional bit of budget are wildly different, not just across the country, but in some cases from moment to moment and from school to school.

One of the things that national standards will allow us to do—the timing is good, allowing us to look at the quantum of notional budget and at whether that remains a good principle, and as I said I gave a reason why I think it might remain a good principle, setting it alongside what the national standards will say—is to say, nationally, what we think the types of need are that it is reasonable to ask a mainstream school to be able to meet for a child without seeking significant additional funding on top of their core budget. That will make it feel a lot more sensible and rational to schools, and will manage some of those incentives better.

Q37 Kate Green: May I ask about the Government's proposals on moving schools into multi-academy trusts? How will you monitor specific spend on SEND pupils in academy chains to ensure that it reaches them?

Susan Acland-Hood: In general, we try not to operate a system in which we track lots of individual items of spend within school budgets; we try to focus much more on the outcomes and whether the school is overall managing its budget well in order to make sure that children get the right outcomes for them. Again, as we work through the point on notional budgets and the standards, we can look at that, but I think it will help, because it will give a much clearer framework for what the expectation is of the support that the child should receive, which I think is the important thing. This might sound crude, but I genuinely do not mind how much money is spent on my child; what I want is for them to get the thing that they need.

Q38 Kate Green: Will mixed multi-academy trusts with special schools and mainstream schools in the trust be able to pool their high-needs funding and reallocate it in flexible ways as they see fit? If that is the case, how much transparency will there be for parents?

Susan Acland-Hood: We have some mixed multi-academy trusts at the moment and—I think I am right in saying—we allow GAG pooling for them as well as for any other multi-academy trust. Again, the test is outcomes. Are they serving the children of the whole academy chain well? We test that through accountability for what they have delivered.

Q39 Kate Green: There may be some mismatch between that approach and what parents expect, exactly as you say, in terms of support for their own



HOUSE OF COMMONS

child. That might require some further thinking.

Overall, looking at the proposals in the Green Paper, have you been able to do an assessment at this stage of the costs of the plans, and of the benefits and savings that will accrue, learning from the apparent failure to do that adequately for the 2014 reforms?

Indra Morris: As I said earlier, that is a key part of the delivery planning. We are in live consultation now, and we will reflect quickly on feedback from that. We have already have over 500 responses. As Steph said earlier, we have over 120 events as well. So, as we go from consultation to design and delivery, we will work through what the cost-benefits are and, given what we have heard, which should we phase? So, what elements of this should we prioritise? To what extent should we target particular places, as opposed to doing national? There are some important discussions and decisions to be made, once we have a good set of feedback and input from the consultation.

Stephanie Brivio: One thing to say that is slightly different from last time, in 2014, is that £70 million is available this time for a change programme. We realised that implementation was more of a challenge last time, so there is £70 million. As Indra says, depending on the outcome of the consultation, we will look at how best to use that as part of the implementation plans.

Q40 **Kate Green:** Will you be publishing a full regulatory impact assessment as part of this ongoing gathering of responses and for firming up the plans?

Susan Acland-Hood: We would expect to do that alongside the delivery plan, so having got the consultation, rather than during the consultation—get to the proposition, and then do the regulatory—

Kate Green: But an impact assessment will be published with the delivery plan.

Susan Acland-Hood: Yes.

Indra Morris: Yes, and I think they will have to come back to that as, for example, we develop, agree and firm up the national standards and different elements. One of the things we need to think about is how we do that in a way that is not fragmented, so that there are multiple things that just confuse people. So yes, we will work that through.

Q41 **Kate Green:** May I ask about another set of issues in relation to parents' choice of school? The intention is to offer them a tailored list of settings. Parents will be concerned that may just be a cost-saving measure. How will you reassure them? In what circumstances might it be appropriate to fund a place at an independent special school? Who would make that decision?

Indra Morris: As I said, for many parents it can be a bewildering experience, which can slide into being an adversarial experience, when they are trying to find a place. I have talked to parents who have said, "Well, I think I have a choice, but I don't really know what my choice is." Trying to work out what is available is almost a full-time job. So the tailored list is



partly a function of saying to a particular area, "Think about and be transparent about what the need is in your area and what provision ought to be and is available, and therefore what is on the table for parents." That is a clearer choice that we might want, in principle, to have now, but actually does not really exist.

- Q42 **Kate Green:** Who would make the decision if a place were to be funded at an independent special school?

Indra Morris: Independent specials will be subjected to the national standards and to the tariffs and bandings; that is incredibly important. It will come back down to the need of the child, what is available locally and the panel decisions. Of course, the panel decisions, as in some of the really good LAs, will have parents as part of that decision making.

- Q43 **Kate Green:** Because as you rightly observe, it is often a very confrontational process. It often leads right to the door of a tribunal before agreement is made with the family.

Finally, can you say a little bit about how confident you are that your mediation plans are going to be effective? Are we now seeing the removal of the role of the local government and social care ombudsman as a route of redress for parents?

Indra Morris: The whole aim of the mediation approach is early redress. We know the impact on the child is profound from delays and anxiety. At the moment, if you go to a tribunal you need to get a mediation certificate, but you do not actually have to take up the mediation, as you know. I think in 73% of cases, parents who go to mediation do not then go on to tribunal, so that helps to resolve that, which is incredibly important. It is about early redress. It is not about shutting off an appeal process that should rightly be there if it is needed, but about trying to resolve things earlier. If you have ever sat in a tribunal, let alone the waiting time to get there—sorry, you asked me something else?

- Q44 **Kate Green:** I asked about the local government ombudsman. Will there still be a role for that office?

Indra Morris: As you know, there is periodic discussion about the role of the local government ombudsman. I think we risk adding another layer and another complication, when what we should be doing is trying to make the system work, as we set out in the SEND Green Paper, and include some very strong accountability and transparency. So I do not see a change in the role of the local government ombudsman. I think they are really helpful in their local government focus. As you know, they do quite a lot of analysis, and take their casework and say, "These are the lessons; this is the experience." We draw on that, both in thinking about how we implement reforms but also in the work of the regions group and in engagement in individual areas.

- Q45 **Chair:** I want to come back to the point about academy trusts. We have discussed per pupil funding before and how academy trusts do not necessarily have to pass that through to schools. From your response to Ms Green, I am a bit concerned that you can pool the money for special



HOUSE OF COMMONS

educational needs in academy trusts but not in other schools. Am I right in interpreting what you said properly?

Susan Acland-Hood: GAG pooling operates in any academy trust, whether it contains mainstream or special schools, or both.

- Q46 **Chair:** So, as a parent of a child with special educational needs, you would not see the money that is allocated to your child. If it is allocated to the academy trust, you would not be able to read from that that it would necessarily go to the individual school and to your own child. Can I be really clear about that?

Susan Acland-Hood: It is true in any school that the parent cannot necessarily trace the amount of money that has been allocated to their child.

- Q47 **Chair:** It is allocated at an individual school. The money goes to that individual school. That is the point. If it is allocated to a school in an academy trust, it goes to the trust. It might not go to that school.

Susan Acland-Hood: Yes, that is true. The critical thing is that it is about outcomes. We have good examples of times when that helps the trust deliver better for all of the children across the trust.

- Q48 **Chair:** But the money is allocated through special educational needs for the EHCP for individual pupils. That is what I cannot quite reconcile.

- Q49 **Kate Green:** In other words, high-needs funding might not be reaching high-needs pupils.

Indra Morris: Sometimes that is pooled to then buy services that that child needs that are better.

Susan Acland-Hood: For example, an academy trust might decide that it wants to pool some funding across the whole trust to buy a speech and language therapist to provide speech and language therapy for children across the whole trust. It is highly likely they would spend the majority of their time with children with an identified need. The EHCP sets out needs that must be met, and that cannot be pooled. You cannot pool the meeting of the needs. You have to meet the needs, but you might pool the funding in order to meet the needs better. That might, for example, allow the academy trust to meet the needs of the children with an EHCP really well, and help them do early identification and support for other children across the trust. That might be a completely sensible and good way to think about it.

- Q50 **Chair:** Are you evaluating how they are spending it compared with stand-alone schools?

Susan Acland-Hood: We look at outcomes.

Chair: You say that repeatedly. It is always suspicious when a permanent secretary uses a specific phrase.

Susan Acland-Hood: I just care about outcomes.

- Q51 **Chair:** So you are measuring outcomes in trusts that pool the money and



HOUSE OF COMMONS

comparing that to schools that are stand-alone. I am not necessarily saying that one benefits. I am interested in knowing if you are seeing the difference very categorically in terms of numbers and outcomes for individual pupils.

Susan Acland-Hood: We absolutely look at the differences in outcomes between different schools. Increasingly, post White Paper, we will be looking at it trust by trust as well. The thing I am pushing back on a little bit is that I do not think it is the pooling of the funding that makes the biggest difference in how well schools meet children's outcomes. What you will see is the concatenation of lots of other different factors, including the quality of leadership in the school and so on. We do look at it, but the starting point is: is the school providing good outcomes for children? If not, what are we doing to make sure that they provide good outcomes for children?

Chair: We will keep an eye on that one. Ms Richardson, over to you.

Q52 **Angela Richardson:** Ms Acland-Hood, you will be delighted to know I have just a few last questions on this section today. They are on the timeline for the Department for Education. There is an issue with the SEND system, otherwise we would not have the SEND review and you would not have put the Green Paper together. When can we expect to see the tangible improvements that we need to the system, and what will be the leading indicators to show whether that system is improving?

Susan Acland-Hood: The first thing to say is that we really appreciate that there are challenges now and that there are lots of people in the system who can't wait for improvement. A lot of things that we are doing are not about waiting for the processing of the Green Paper. The 10,000 extra respite placements we have invested in; £18 million over the next three years in support of internships; and £2.6 billion over the next three years to deliver 33,000 new places and improve existing provision for children and young people with special educational needs—none of that is waiting. We are trying to get on with it as fast as we possibly can.

As I say, there is £1 billion extra into high-needs funding in the next financial year. As soon as the consultation is closed, we will move into absorbing those consultation responses and put them into a really good implementation plan, which you will see later this year. That will set out the timetable for what people can expect to see. I don't want to pre-empt the consultation and give you too much on that, but we have a sense of urgency.

Q53 **Angela Richardson:** You have said in your review that you will put out that plan later this year. Given how long the SEND review took in the first place, how confident are you that you will be able to get that out later this year?

Susan Acland-Hood: I am very confident that we will get that out later this year.

Q54 **Angela Richardson:** What timetable do you have in mind for bringing forward legislation?



HOUSE OF COMMONS

Susan Acland-Hood: It is always difficult to pre-empt Parliament and others who have levers on when legislation is brought forward, but we are looking to do that as soon as we can.

Q55 **Angela Richardson:** To what extent could the proposals that you are putting in place be put forward without legislation? What can you do without legislation?

Susan Acland-Hood: There is actually quite a lot of this that we can do without legislation and there is also a lot of work we can do, in preparation for legislation, that will mean we will be able to move quite quickly after the legislation is in place—obviously, without spending in advance of parliamentary authorisation, because that's very bad and I would never do it. Indra, do you want to talk a little bit about what we can do ahead of legislation?

Indra Morris: I think the dashboard is going to be an important part of that. I think we can also use this as a catalyst for improvement, building on the investment we are already making in the safety valve programme, delivering better value, delivering supported internship, respite and so forth. Really driving that forward doesn't need legislation, either. So there is a lot that we can do, but it is fair to say that things like the national standards, some of the structured partnerships and so forth do need legislation. Some of the legislation related to health is obviously already going through. The Health and Care Bill—

Susan Acland-Hood: On the national standards, that is such an important plank of this reform, but I do not underestimate for one single second how incredibly difficult a piece of work it will be. It will be an incredibly difficult piece of work. We see huge variation in how people do things at the moment, and that is not because some people are brilliant and other people are stupid; it's because it is difficult. So one of the things that we are discussing is how we can try to make sure that we are doing lots and lots of early work on that. Again, I don't want to pre-empt legislation; that would be entirely wrong. But you are thinking about whether, for example, you could start with some sort of shadow standards and whether you could start with a process to start to develop that, because it's going to be really, really important that we do that very, very carefully and deliberately, that we involve a lot of people in it and that we are ready to test, iterate and learn as we do it, because getting that right is going to be colossally important.

Indra Morris: We haven't touched hugely this afternoon on alternative provision, but that is another area where a lot can be done. Indeed, some in the sector are already self-organising around what is good, how you measure good alternative provision and how you cement and improve ways of working. One of the few positives to have come, sadly, out of covid is a better relationship in many places between schools and local authorities. We are absolutely capitalising on that in the work that we are doing now.

Stephanie Brivio: I think we shouldn't forget, either, there is quite a lot in the schools White Paper and earlier legislation—in particular, the parent pledge. If your child is behind in English and maths, you are guaranteed

targeted support, and that will very much benefit children and young people with SEND.

Chair: And finally, Kate Green MP.

Q56 Kate Green: I want to ask a few questions about the national tutoring programme. The latest statistical release, in March, suggested that Randstad was falling well behind target in relation to the numbers of academic mentors and tuition partners recruited. Does Randstad still hold a contract from the Department to deliver the national tutoring programme?

Susan Acland-Hood: We have a contract with Randstad which lasts until—well, there's a break point this summer and we have said we are going to exercise that break. I think it's worth saying that Randstad do things for us across all the pillars of the programme. They have worked on the academic mentors part and on the tuition partners part, but they also, in partnership with EPI, provide the training for teachers and teaching assistants as part of the school-led programme. And I think what we have seen over the course of this year—we introduced the national tutoring programme really, really fast. We did it far faster than in normal times you would introduce such a programme. I think it was right that we did it really fast, by the way, because I think the need was there, and I am really genuinely proud that we have provided over 1 million tutoring sessions for young people. I think that is a really good thing to have done. But having introduced it fast, I think it was really important that we were listening and learning as we went through that introduction, and one thing that schools said to us last year was that they wanted a school-led route, which would allow them to use their own teachers and teaching assistants to deliver tutoring. We stood that up and we have put that in place this year. And what we have seen this year is that—not entirely surprisingly, given that schools said they wanted it—that has been an incredibly popular route for schools. We still have some schools who say they want to be able to work with a tuition partner. Actually, we have some who are using the school-led money to buy tuition partners from the other part of the programme as well, so there is a bit of crossover in there as well.

That latest published set of figures shows that we are doing pretty well on the overall programme, but much more of it is going through the school-led route, and less is going through the tuition partners and learning mentors than we anticipated at the beginning of the year. We are resetting the plan for next year to effectively route all the money through schools. It will still be possible for them to buy work from the existing set of tuition partners, so any school that is working with a tuition partner now can carry on using them just as they are at the moment, but they will have control of the money. There will be a single route, it will be simpler to operate, and it follows what we are seeing about what is working.

Q57 Kate Green: When you exercise the break clause this summer, will there be any compensation payable by Randstad for significant underperformance?

Susan Acland-Hood: We are working with Randstad. I am not going to talk about contractual matters in the Committee, if that is all right.

Q58 **Chair:** You are discussing things within the contract at the moment, are you?

Susan Acland-Hood: Yes. The way the contract is set up, for tuition partners and LMs, we pay per item delivered, so that is helpful. The other announcement we made before Easter is that that has allowed us to divert some money from those strands of the programme to the school-led strands. The way that has been set up has been helpful, and has recognised that we might see differences in the different routes. We have new contracts out that are for something different: they are to support a much more school-led programme and to do the things we still need someone else to do in a more school-led programme.

Q59 **Kate Green:** What went wrong with Randstad? We knew 18 months ago that schools were saying that they wanted a school-led approach? What was wrong with the Randstad contract? Why was it awarded?

Susan Acland-Hood: We have definitely had some challenges that we have worked through with Randstad, but I think this is better characterised as us learning rapidly about something, having set up a new programme, rather than it being fundamentally broken. We are on track with our total amount of tutoring. We have seen more of it go through the school-led route than the tuition partner and learning mentor route. I am not sure that is a bad thing. I think it might be a good thing that is sensibly responding to what schools have done.

What we want to watch out for is whether that has happened because schools were put off what Randstad was offering through tuition partners and learning mentors, or whether that has happened because they were actively keener on doing it through the school-led route. We have been working with Randstad to try to identify whether there is friction that means that schools would love to work with a tuition partner but they just find it really annoying to do it through the system, and whether we can take those frictions out. We have been doing a lot of work talking to schools and getting feedback on the things that might be creating that friction.

In general, schools are saying, "Actually, we would just rather use our own teachers and support staff, thank you." We want to support that as long as we can stand up the training. Again, the training has been delivered, and schools have taken that up in very large numbers. Interestingly, we said that if you are using people who are not qualified teachers, we require them to have had the training, but if you are using qualified teachers, you don't have to. Actually, the vast majority of schools have chosen to train their qualified teachers using the training that we provided through the NTP. We didn't require them to do that, but they found it useful. Again, I think that is helpful and interesting, and it injects skill into the system for the future, which is really good.

Q60 **Kate Green:** Can you say with confidence that the programme, as it has been delivered up to now, has been effective in reaching the most



disadvantaged students, for whom it was predominantly intended?

Susan Acland-Hood: What we said to schools was that we wanted them to focus both on disadvantaged students and on the students who had lost most during the pandemic and had the greatest need. We have definitely seen through the numbers that the programme is disproportionately being delivered to children in receipt of the pupil premium. The proportion of children receiving tutoring who are on the pupil premium is massively higher than the proportion of the total pupil population who are receiving pupil premium. It is not exclusively being delivered to students receiving the pupil premium.

We thought it was important to give schools that flexibility. For example, we know that in some places the children who were most affected by the pandemic were not always the ones who were the most disadvantaged. They often were, but not always. We have also seen schools do things like identify and try to focus on cohorts that have the least time left in education to catch up. Quite a lot of schools have chosen to focus on the cohort of children who are about to leave. That won't all be entirely disadvantaged children, but it is a perfectly rational thing for schools to do, and we wanted to leave the flexibility in the programme for them to be able to do that.

Q61 **Kate Green:** Finally, if we are going to a school-led model, with funding going to schools, you will obviously be anxious to ensure that you are getting value for money and that schools are spending that money effectively. How will you assure yourselves and us that that is happening? You will be aware of the Schools Week report that highlighted the anxiety that schools are feeling about the possibility of league tables. Could you say a bit about how you will support schools in spending the money effectively and hold them to account in doing so?

Susan Acland-Hood: As I said, we have the offer of training that goes along with the programme. Part of the re-contracting for next year is to make sure that that offer of training and support is still there. We are asking for data from schools on how many pupils they are tutoring, both through census data—we are doing slightly more frequent data collections at the moment—and through working on how we can do that in a way that is more seamless and easier for schools in future, building on some of the work we are doing at the moment with schools. We are working on the automatic collection of attendance data from schools, which effectively means that they do not have to fill anything in; we can just work with them on really easy transfer. We want to look at that for the future.

We also have evaluation work of the first year of the programme, which the EEF is doing, and we have an evaluation coming a bit later this year, which is both process evaluations and outcome evaluations looking at the impact of what is being done. We are interested in whether people are doing that, but we are also really interested in whether it is having the effect that we hoped and that the EEF's research on tutoring says it should have.

I know schools have been anxious about the collection of data and the transparency around data, but our principle—the Secretary of State is very



HOUSE OF COMMONS

passionate about this—is to try to use data and transparency much more widely across the system, not as a stick to beat people with, but as a way of shining a light on what is happening and allowing people to look at what each other is doing. That is the spirit in which we said that we were going to ensure that the data was made available.

- Q62 **Chair:** Thank you. On that point, I have a final question. You laid out for us that schools are focusing a lot on the leavers; we know that from the reality. A secondary school teacher in my patch says that they have to work on things such as handwriting for years 7 and 8, and that they are losing teachers to the exam years. There are some of the same issues at primary level, as you have just highlighted. Are you concerned about that? You say that it is okay for them and that it is a rational choice, but it can leave the cohort that is not the exam or leaver years significantly behind and under-supported. What are you doing about that?

Susan Acland-Hood: This is one of those careful balances. Again, my starting point is that we have to trust schools and teachers to make sensible choices and to know their children and their school. Particularly in the context of the pandemic and pandemic recovery, there is some sense in saying, “If you have children who are about the exit to system, try to ensure that they exit the system having had as much support as possible.”

- Q63 **Chair:** But my point is that if the cohort behind them are not catching up, you will have that bubble going through for quite a long while—for a generation.

Susan Acland-Hood: Indeed, and you cannot do that totally at the expense of everybody else—that would be a mistake—but I do not think having a bit of gradient in there is a completely irrational thing. Something that we picked up in the schools White Paper was that one of the more general things that gets raised in the system is the risk that key stage 3 in particular—years 7, 8 and 9—does not always get the same focus in the system as the exams years in secondary. That is one of the reasons why the White Paper has a real focus on intervention to support really good-quality curriculum planning mapping and curriculum resources, and there is also a proposal for, effectively, better sample tests at key stage 3 to help us keep track. Again, that is not an accountability measure—it is not individual-pupil level or individual-school level—but will help us to keep track of progress through the system for key stage 3.

- Q64 **Chair:** So you are evaluating it; that is very helpful. Will governors and others who are responsible at a local level have access to that useful information?

Susan Acland-Hood: Again, we are working on the proposals. At the moment, they are a bit more system-level than school-level, partly because we do not want—

- Q65 **Chair:** Well, the system-level can still inform governing bodies—that is the point—so they need to be alert to that in their own settings.

Susan Acland-Hood: Yes.



HOUSE OF COMMONS

Chair: Thank you very much indeed for your time.