

Written evidence submitted by the Royal National College for the Blind

**ROYAL NATIONAL COLLEGE FOR THE BLIND
SUBMISSION TO EDUCATION SELECT COMMITTEE INQUIRY
THE IMPACT OF COVID-19 ON EDUCATION AND CHILDREN SERVICES**

INTRODUCTION

This is the Royal National College for the Blind's (RNC) submission to the Education Select Committee inquiry on *The Impact of Covid-19 on Education & Children Services*.

We set out our experience of the last six months covering three areas in the inquiry's Terms of Reference

- *“the financial implications of closures for providers (including higher education and independent training providers), pupils and families”.*
- *“the effect on disadvantaged groups, including the Department’s approach to free school meals and the long-term impact on the most vulnerable groups (such as pupils with special educational needs and disabilities and children in need)”.*
- *“what contingency planning can be done to ensure the resilience of the sector in case of any future national emergency”.*

It is split into an executive summary and a background paper.

Our comments refer to the Special Education Needs and Disability (SEND) system in England.

EXECUTIVE SUMMARY

1.1: The Royal National College for the Blind (RNC), based in Hereford, is the UK's only national specialist education and training provider for 16 to 25 year olds with visual impairments (VI). We are an independent, residential college which enables us to run an intensive curriculum and support programmes for up to 90 students a year. This equips each student to make a full transition to independent living, further study (including university) and employment. The c100 post-16 residential specialist colleges like us plug the holes in the mainstream system. We offer provision where there is a need for a multidisciplinary approach, with specialist equipment, facilities and expertise.

1.2: We took a pragmatic decision to close our campus from 18th March and switch to remote, distancing learning for the remaining weeks of the 2019/20 academic year. We spent the following days ensuring that every student travelled home safely without the use of public transport to avoid any potential travel restrictions. This was despite the Education Secretary's announcement advising residential providers to remain open despite advising day schools and colleges should close from 20th March. We were unable to guarantee our community's decision because of staff-shortages from shielding. We still stand by our decision.

1.3: We reopened our campus to students from 10th September, with first classes starting on 14th September. We have put extensive covid-safety controls in place, based on guidance from the Department for Education (DfE), Herefordshire County Council and Public Health England. This now includes the Rule of Six policy announced on 14th September. We have also drawn on the Scientific Advisory Group for Emergencies' (SAGE) published advice where needed. We have completed individual

risk assessments working with students and families, with an overarching risk assessment for the college overall and the safety of students. This is accessible to all local authorities commissioning places with us in 2020/21. We have, at this point, done all we can to limit the risks to our community's health, safety and welfare. Section 2 in the main background document sets this out in detail.

1.5: The Prime Minister stated on 22nd September the current social restrictions would be in place for “perhaps six months” to suppress the spread of Covid-19. Ministers have not ruled out a second national lockdown, including the closure of schools and colleges. These uncertainties will put significant pressures on SEND providers from ongoing additional costs; ongoing commercial losses; ever tighter local authority budgets; the growing backlog in tribunal cases; and increased challenges in transition to post-16.

1.6: The situation for high-impact, low-incidence needs like VI is already acute even before Covid. We are in a perfect storm of pressures which have built up over the last decade: year-on-year cuts in VI services; real terms cuts in education budgets; rising demand for high needs budgets; and now Covid-19. Young people with VI are running out of options: squeezed out of mainstream schools and colleges; lack of specialist support at home; and limited funding for specialist placements, like RNC.

1.7: We have taken tough decisions to put our finances on a firm footing and are now at the midpoint of a robust Business Recovery Plan — but the exceptional circumstances created by Covid-19 mean independent providers like us are at greater risk, giving young people with VI even less options post-16. Put simply, there will be no replacement for RNC if we are forced to close.

1.8: We believe Covid-19 underlines the case for wholesale reform of the entire funding and commission model created under the Children & Families Act 2014, particularly in post-16 provision. However, the immediate challenge is urgent intervention from policymakers during the current crisis. This is not a RNC problem. It's a systemic problem.

1.9: We have focused our submission on practical recommendations to support special post-16 providers, particularly independent residential providers like RNC which rely for the vast majority of income on funding agreements with individual local authorities.

1.10: So our full accompanying paper sets out:

- our current context and background.
- RNC's pandemic response since March 2020.
- our seven recommendations to policymakers.

Our recommendations in summary are:

- **Recommendation 1: Funding guarantees for 2020/21 placements regardless of disruption or closures due to the pandemic:** We urge DfE to require placements to be fully funded as it did in 2019/20 - with ESFA providing additional top-ups to local authorities where required until the end of the 2020/21 academic year. It is perverse for providers to be made financially liable for following mandatory or advisory Covid-19 restrictions, like lockdowns. This means, ultimately, students pay the price if local authorities can potentially withhold funding where provision is disrupted.

- Recommendation 2: DfE to rule out any new emergency suspension of local authorities statutory duties under the Coronavirus Act 2020 in any circumstances:** the Education Secretary used his powers under Coronavirus Act to allow local authorities to use their “reasonable endeavours” to secure provision in accordance with young people’s EHCPs¹. This emergency suspension ran from 1st May to 31st July nationally, with additional loosening in guidelines on assessment deadlines ending on 25th September. It would be deeply irresponsible for ministers to reimpose the emergency suspension with absolutely no analysis or assessment of its impact over the summer.
- Recommendation 3: DfE to open a new “exceptional costs” programme to make and keep campuses covid-secure:** We ask DfE to extend eligibility for special post-16 provider, both maintained and non-maintained. We have been forced to invest an c£185,000 (3.2% of income) to date to create covid-secure living, recreational and study environments this term - with more to come. RNC has not had a penny of extra funding from DfE². This is in addition to £447,000 losses in commercial income to date since the national lockdown was called.
- Recommendation 4: Fully fund course extensions to enable all young people to finish their studies:** We urge ESFA to require or fund local authorities to cover additional costs to allow students to complete courses originally due to end in the 2019/20 academic year. It is perverse and unfair if the Covid-19 lockdown leaves students high and dry if a syllabus could not be completed remotely, a situation completely outside their control.
- Recommendation 5: Students to get priority access to national job and training schemes:** We urge DfE and Treasury to work with the sector to ensure 16 to 25 year olds with EHCPs can make the transition into the workforce. Young people with high impact, low incidence needs like VI are at greater risk of being not in education or employment (NEET). RNC’s mission is to give young people the independent living skills they need - but the government must enable them to take full advantage of ongoing study, careers development and earn-as-you-learn routes.
- Recommendation 6: DfE to accelerate and publish its SEND Review to deal with the longer-term flaws in the current system and the immediate challenges created by the Covid-19.** We have had 12 months of near-deafening silence from the Education Secretary following him launching the SEND Review. Ministers cannot duck the flaws in the current special education needs and disabilities (SEND) system highlighted in the last 12 to 18 months by the [Education Select Committee](#), [Local Government & Social Care Ombudsman](#); [National Audit Office](#); [Public Accounts Committee](#); [Local Government Association](#) and Association of Directors of Children’s Services.
- Recommendation 7: DfE and DHSC to invest RNC into a national, centre of excellence into national center of excellence for VI.** It is not feasible or viable at local or even regional level to provide the intensive education and training we provide. So we believe there is an opportunity to pilot a new funding and commissioning model for post-16 students with high-impact, low-

¹ From 1st May to 31st July 2020, section 42 of the Children and Families Act 2014 (duty to secure special educational and health care provision in accordance with EHC plan) was modified by a notice from the Secretary of State for Education issued under the Coronavirus Act 2020. Local authorities and health commissioning bodies were required to use their ‘reasonable endeavours’ to discharge this duty.

² Our current estimate of additional costs is (a) £60,000 in additional cleaning and estates equipment and consumables (PPE); (b) £14,000 in running costs for additional hall of residence; (c) £20,000 in additional cleaning hours; (d) £34,000 in additional residential staff; (e) £45,000 in specially adapted laptops (£30,000 from ESFA’s 16-19 Bursary Fund); (f) £12,000 in additional wireless access points, to support working from halls and converting offices to teaching areas.

incidence needs. We have discussed this previously with ministers and DfE officials but the current crisis adds to the urgency.

1.9: We want to work with policymakers so we can assess the impact of the pandemic on children and young people with VI; identify the support required to get them back on track; give them a pathway to further study or work; and use our decades of expertise with other secondary or post-16 providers.

The Prime Minister has spoken of his desire to “[build, back, better](#)” following the pandemic. So more broadly, RNC and all our partners are desperate to see the same urgency about reforming the wider SEND system, with the investment, infrastructure and reform required to make it stronger.

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30th September 2020

**SUBMISSION TO EDUCATION SELECT COMMITTEE INQUIRY
THE IMPACT OF COVID-19 ON EDUCATION AND CHILDREN SERVICES**

FULL BACKGROUND PAPER

1.1: We've transformed thousands of young people's lives over almost 150 years: whoever they are, wherever they come from and whatever their visual impairment. Our mission is to give them all control of their future, equality of opportunity and true independence - dismantling the barriers that hold them back from achieving their full potential. We're pioneering, unique and proven.

1.2: RNC equips each student to make a full transition to independent living, further study (including university), and employment. We offer a unique multidisciplinary course portfolio tailored for VI; specialist equipment and facilities; and decades of intensive teaching experience. We work with researchers and industry to develop innovative new assistive technology. And we host the UK's only blind sports academy, partnering with the Football Association and other sports governing bodies.

1.3: Our students trial a range of assistive tools to find what best suits them after years of dependence on teaching staff. We provide training in mobility and independent living skills, then embedded through regular, supervised practice to be truly effective. The importance of studying and living with a peer group who have shared life experiences cannot be underestimated. All of these skills and experiences combine to prepare our students to live and work in a sighted world.

1.4: VI is a high-impact, low incidence condition. The [ONS reports 82,800 five to 16 year olds EHCP](#) in 2019/20 - with only 3,411 with visual impairments as their primary need. The Royal National Institute for the Blind (RNIB) estimates there are approximately 10,000 young people in England aged between 16 to 25 with a VI severe enough to require specialist support. However, this is complicated by wide variations in the nature, severity and onset of VI, and for many young people their visual impairment is accompanied by additional needs. RNC has remained specialist in VI deliberately to provide the intensive expert support required by our students.

1.5: The Children & Families Act 2014 and its statutory [SEND Code of Practice](#) enables young people up to 25 with SEND to access provision to achieve the education and training outcomes identified in their EHCPs. The Act requires local authorities to consolidate all services and support available into a Local Offer, to fully meet young people's statutory entitlements are meet. There is no automatic right to continued support at 19 or expectation that those with an EHCP should stay in education until 25. Local authorities, however, must not cease an EHCP simply because a young person turns 19 if they take more time to prepare fully for adulthood.

1.6: RNC was already dealing with a perfect storm of pressures which have built up over the last decade: year-on-year cuts in local VI services; real terms cuts in education budgets; and rising demand for high needs funding. Young people with VI are running out of options - squeezed out of schools and colleges; lack of specialist support at home; and very limited funding for specialist placements for young people with low incidence, high impact needs. Covid-19 will exacerbate this.

1.7: RNC has no lack of demand. We plug a gaping hole in the post-16 system. It is not realistic or viable, given the numbers, to offer RNC's level of intensive, specialist expertise across mainstream or pan-SEND providers. Yet we are at the mercy of individual local authorities refusing to fund out-of-area placements - a perverse incentive of creating a system based on local commissioning without the full funding required. There has been a loss of specialist commissioning expertise in VI and loss of senior SEND officers. So

perhaps unwittingly, there has been an ingrained 'put up and shut up' attitude and 'get what you're given' mentality towards young people with VI. This denies them specialist support day-in day-out, with individual needs ignored and funding rationed by cost and postcode.

1.8: Covid-19 has held back our numbers to 76 at the start of the 2020/21 academic year commissioned by 48 individual local authorities in England and the Welsh Government. This includes 28 new entrants and 36 returning students and 12 students on extended placements. Of the returning students, four have not yet had their funding confirmed, but we have readmitted them to avoid interrupting their education. We have a further five potential students in the tribunal system up to the end of the year, and a further four potential students attempting to secure an EHCP, three of whom were initially refused a needs assessment despite their visual impairment.

1.9: Our financial sustainability, however, requires student numbers to return to and remain at 90+ by 2022/23. We are now at the midpoint of a three-year Business Recovery Plan to rescue, recover and rebuild our finances, caused to a great extent by Children & Families Act 2014. We were progressing well pre-pandemic and ESFA gave us a "satisfactory" financial grading in February 2020. But the lockdown changed the outlook as it has for all independent providers. We have kept ESFA fully informed about (a) our plans to reopen the campus, including the upfront and ongoing running costs to ensure it is covid-secure; (b) local authorities' placement decisions which impact on our bottom line; (c) our bank lender providing additional flex in our current loan agreements and covenants.

2. Our Covid-19 Response

2.1: We decided to close our campus on 18th March 2020. Students had already started returning to their homes because of their concerns and their families concerns about the spread of the pandemic. We were also experiencing increasing levels of staff absence due to illness, vulnerability to Covid-19 or the vulnerability of their families. It took several days to ensure that all students were able to return home in a controlled and safe manner. All staff transferred initially to working from home, the students safely home although the Estates team later returned to campus to ensure that essential maintenance works continued.

2.2: The DfE's initial 18th March announcement confirmed school and colleges should close two days later "*except for the children of key workers and vulnerable children*" and advised residential providers to remain open. We judged, however, the scale of protective measures was not achievable overnight within a community of young people with VI. This proved to be correct, with substantial changes required to student facing areas of the campus following the issuing of guidance to specialist residential settings on 2nd July 2020, the need for all staff to be trained in new protocols, and the need for individual risk assessments to be completed for each student, as well as comprehensive risk assessments for all areas of the campus..

2.3: We adapted our personalised, intensive, tailored curriculum to online provision very rapidly, using a combination of Teams, Moodle, WhatsApp, text, email, phone calls and other platforms to suit individual circumstances. We supplied students with laptops and additional technology to support their home working, where needed. The majority of subjects were successfully taught remotely, and where this was not possible, such as the practical elements of sports qualifications, students were set individual challenges which ensured their skills remained up to date. Timetables were adapted to suit individual needs such as the home environment of the student, and teachers of subjects that could not be delivered remotely, such as mobility, took on tutor groups to enable colleagues in other subjects to teach more

flexibly. Residential staff provided wellbeing support, maintaining contact with students that was completely separate from their studies and focused instead on their emotional and physical wellbeing.

2.4: Our provision is built around highly personalised face-to-face support, in-person learning and intensive learning - all designed to equip our students to live, work and study independently. So our aim from the start of lockdown was to reopen the campus as soon as possible so we returned to full teaching, extra curricular, social and residential provision. We have proven we can deliver remote learning successfully, which can be scaled up again in the event of local lockdowns or other events that forcing our students to remain at home. Our students' needs will never be met by long-term remote teaching, however.

2.5: We've been frustrated jigsaw of guidance since 18th March of residential providers, SEN and further education³. We recognise that Covid-19 is a fast-moving challenge for the entire country and guidance cannot be tailored for individual providers' intakes. It's clear, however, there needs to be more haste, less speed in consulting, preparing, signing-off and promoting guidance to frontline professionals to implement. There has been generic, often recycled, information about special post-16 providers spread across multiple publications with very little specific for 19 to 25 year olds with EHCPs.

2.6: We had originally based our September reopening on the two metre distancing advice and DfE's initial guidance that "*special post-16 institutions will work towards a phased return of as many young people as can be safely catered for in their setting*". We had planned a rotation model with fixed groups of students taught the full timetable on campus for a set period, including intensive mobility and independent living skills training, then rotated out for the next group of students. Students off campus would have their courses taught remotely as during the entire 2020 spring and summer terms.

2.7: Our plans, however, changed after the Education Secretary announced his expectation for a "full return" of all early years, school and college settings from September, including special post-16 colleges. He told the House of Commons "*our intention is that those with EHCP or SEN will also be back in school or college...*". The Prime Minister underlined this expectation on 17th July: "*in September, schools, nurseries and colleges will be open for all children and young people on a full time basis, as planned*".

2.8: The DfE position forced our hand by in effect giving the green light to our commissioning local authorities to withhold residential fees in 2020/21, if we were not able to provide full residential provision. We would have preferred the greater discretion to develop a more phased reopening, while still meeting the requirements on each student's EHCP, especially given our student population is drawn from across England and Wales (we currently have students from 48 English local authorities).

2.9. We have now put extensive covid-safety controls in place based on the latest guidance from the DfE, Herefordshire County Council and Public Health England's requirement. This now includes the Rule of Six policy announced on 14th September. We have also drawn on the Scientific Advisory Group for Emergencies' (SAGE) published advice where needed.

We have put contingency plans in place if (a) our students are required to self-isolate on campus or home or (b) RNC is required to limit attendance or close due to a local outbreak based on the four tiers for handling local lockdowns.

³ *What FE colleges and providers will need to do from the start of the 2020 autumn term*, July 2020: <https://www.gov.uk/government/publications/coronavirus-covid-19-maintaining-further-education-provision/what-fe-colleges-and-providers-will-need-to-do-from-the-start-of-the-2020-autumn-term>

We believe, at this point, we have done all we can to limit the risks to our community's health, safety and welfare. We are not complacent but believe our plans at this point exceed the minimum baseline set by DfE.

2.10: We are grateful for DfE and ESFA required commissioning local authorities to fully fund agreed placements (including the residential fee) until the end of the 2019/20 academic year. This enabled us to switch to an online provision, while covering our core overheads. This gave us a crucial financial buffer.

2.11: We have had to reopen, however, without any DfE support. We have been forced to invest an additional c£185,000 this term to redesign every element of college life to maximise infection control, support social distancing and reduce transmission risks⁴.

This include:

- dividing our student body of 76 into three communities, broken down into specific households who live, study and socialise together. The households are based on students' areas of study, to allow the maximum possible freedom within each group.
- basing each household in its own hall of residence where there are communal kitchens and living areas, and each student has their own en suite bedroom. This enables us to accommodate small numbers of self-isolateds where required.
- creating zones in our recreational and teaching spaces on the campus which one household can enter at a time, with deep cleaning between each household use and hotspot cleaning throughout the day. This required staggered curriculums and syllabuses; one-way routes to reduce pinch points; and additional residential and cleaning staff to maintain safe staffing levels across our three halls and to permit ongoing cleaning throughout the day.
- requiring staff to wear personal protective equipment when working closely with a student, such as delivering one to one training in mobility or independent living skills or provision of nursing and residential supportt
- requiring students to have their temperature tested before leaving their hall of residence each morning. We have additional specific arrangements in place for our sports facilities.
- equipping laptop specialist assistive software has been provided to each student at a total £45,000. This enables all students to work from their hall of residence or home in the event of self isolation or a local lockdown. This minimises the risk of cross contamination from sharing desktop devices.
- requiring all non-student facing staff, who are able to do so, to work from home. This has required us to invest in additional support for some staff to ensure their home working environment is compliant with health and safety requirements, and to purchase laptops and other additional equipment where needed.

⁴ Our current estimate of additional costs is (a) £60,000 in additional cleaning and estates equipment and consumables (PPE); (b) £14,000 in running costs for additional hall of residence; (c) £20,000 in additional cleaning hours; (d) £34,000 in additional residential staff; (d) £45,000 in specially adapted laptops (£30,000 from ESFA's 16-19 Bursary Fund); (e) £12,000 in additional wireless access points, to support working from halls and converting offices to teaching areas.

2.9: We lost £278,000 in income during the enforced closure of our leisure and conferencing centre (thePoint4) during the national lockdown. This has now been partially reopened in line with government guidance but which will continue to perform below expectations due to ongoing restrictions on both leisure and corporate bookings. We have lost a further £169,000 for the 2020/21 by being unable to rent out our third residential hall.

2.10: We are incurring additional costs by being forced to postpone reconfiguring an existing building into a new teaching area for Independent Living Skills, Mobility and Business Administration department, with office accommodation for non-student facing staff on the second and third floors. This was a key part of our Business Recovery Plan. We are not currently eligible for support from the FE capital budget confirmed in the 11th March Budget statement. We are now having to finance much of additional cost through seeking charitable donations, which is particularly challenging in the current climate.

2.11: We have completed individual risk assessments working with students and families, with an overarching risk assessment for the college overall and the safety of students. This is accessible to all local authorities commissioning places with us in 2020/21. Our risk assessments are also co-production with students, families and social workers - but the lack of join-up in the system means the level of duplication has proven enormously inefficient for all parties.

3. Challenges and Asks

3.1: The Prime Minister stated on 22nd September the current social restrictions would be in place for “perhaps six months” to suppress the spread of Covid-19. Ministers have not ruled out a second national lockdown, including the closure of schools and colleges.

3.2: This submission has five recommendations for policymakers to consider to mitigate the immediate risks, with a further two on long-term reform. We have focused on practical measures to support special post-16 providers, particularly independent residential providers like RNC who are not fully grant-funded by the Education and Skills Funding Agency (ESFA) and rely for the vast majority of income on funding agreements with individual local authorities.

3.3: **Recommendation 1: Funding guarantees for 2020/21 placements regardless of disruption or closures due to the pandemic:** DfE to require placements to be fully funded as it did in 2019/20 - with ESFA providing additional support to local authorities where required until the end of the 2020/21 academic year.

3.4: All post-16 providers like us will face significant additional costs to maintain a covid-secure estate, if the current restrictions remain in place for a minimum of six months. This is coupled with ongoing commercial losses; ever tighter local authority budgets; the growing tribunal backlog; and challenges in securing placements from secondary school to post-16. We have taken tough decisions to put our finances on a firm footing but these exceptional circumstances mean independent providers like us are left highly exposed.

3.5: It is perverse for providers to be made financially liable for following mandatory or advisory Covid-19 restrictions, like lockdowns. This means, ultimately, students pay the price if local authorities can withhold funding where provision is disrupted.

So a funding guarantee will eliminate the current uncertainty over:

- whether financial and contractual liability for fulfilling the EHCP's outcome sits with the provider or the commissioner during disruption by Covid-19.
- whether local authorities or ESFA have the right to withhold elements of the providers' fees - and if so, under what circumstances.
- whether local authorities have the right to withhold RNC's residential fee, if (a) students choose to live and study at home if they are concerned about the health risks; (b) local lockdowns prevent students from travelling to and from RNC campus.
- 19 to 25 students with EHCPs being unable access the £650m universal catch up premium funding, available for local authorities commissioning placements in independent providers
- students with EHCPs being blocked £96m ringfenced funding for 16 to 19 providers from the National Tutoring Scheme on 20th July.

3.6: **Recommendation 2: DfE to rule out any new emergency suspension of local authorities statutory duties under the Coronavirus Act 2020 under no circumstances**: We urge the Education Secretary not use his powers again under Coronavirus Act to weaken young people's statutory rights. The Act allows local authorities to use their "reasonable endeavours" to secure provision in accordance with young people's EHCPs⁵. This emergency suspension originally ran from 1st May to 31st July nationally, with additional loosening in guidelines on assessment deadlines.

3.7: We urge, in addition, the DfE fully:

- assesses where local authorities' decisions and actions fell short of "reasonable endeavours" - reviewing individual cases where necessary.
- ensures all commissioning authorities are now securing all provision specified in each EHCP since 31st July;
- publishes clear criteria on when, if and how the powers under Coronavirus Act 2020 emergency measures may be restored in future national or local lockdowns;
- informs Ofsted how local authorities have applied the emergency powers under Coronavirus Act 2020 ahead of full inspections being restored from January 2021.
- additional high-needs budget in 2020/21 to reduce the backlog in applications for EHCP.

3.8: We fear Covid-19 will worsen the divide between the haves and have-nots in post-16 provision for VI students. We see case-after-case where students have enormous challenges in securing post-16 needs assessments and EHCPs - which makes the transition from secondary school to post-16 very challenging. This creates a cliff edge for VI students every year and under the current system RNC can only provide education and training for a fraction of the students who need us.

⁵ From 1 May to 31 July 2020, section 42 of the Children and Families Act 2014 (duty to secure special educational and health care provision in accordance with EHC plan) was modified by a notice from the Secretary of State for Education issued under the Coronavirus Act 2020. Local authorities and health commissioning bodies were required to use their 'reasonable endeavours' to discharge this duty.

3.9: Recommendation 3: Emergency financial support to make and keep campuses covid-secure:

We urge DfE to renew its “[exceptional costs](#)” programme, extending eligibility for special post-16 providers, maintained and non-maintained. We have been forced to invest an additional c£185,000 upfront to create covid-secure living, recreational and study environments, yet RNC has not had a penny of extra funding from DfE⁶.

3.10: We are midway through a three-year Business Recovery Plan and risk slipping back if we have to absorb all additional costs required to protect students, staff and visitors. We did not seek to recoup these additional costs by renegotiating placement contacts with local authorities to include additional costs for two reasons: first, we recognise the extreme pressure on their limited budgets and second, we risk the placement altogether, leaving young people with no alternative.

3.12: **Recommendation 4: Fully fund course extensions to enable all young people to finish their studies:** We urge ESFA to require or fund local authorities to cover additional costs to allow students to complete courses in the current 2020/21 academic year - to get the full experience they require to live an independent life.

This includes:

- students who turns 26 during lockdown and are now longer eligible for 16 to 25 high-needs funds to complete their placements.
- students who could not complete practical assessments on vocational courses, meaning the relevant awarding bodies are unable to be awarded their qualifications.

We are grateful to the local authorities who have recognised the need for students whose placements were due to end in July 2019 to have an extension in order to achieve all of their outcomes.

However, as it stands all local authorities are free to refuse, and the full impact of Covid during the current academic year, even if a return to full lockdown can be avoided, is not yet known. It is perverse and unfair if the Covid-19 lockdown leaves students high and dry if a syllabus could not be completed remotely, a situation completely outside their control.

3.13: **Recommendation 5: Students to get priority access to national job and training schemes:** We fear young people with VI will be highly vulnerable in the current volatile labour market⁷. The risk is students end up leaving education or training with minimal options as the current system has no

⁶ Our current estimate of additional costs is (a) £60,000 in additional cleaning and estates equipment and consumables (PPE); (b) £14,000 in running costs for additional hall of residence; (c) £20,000 in additional cleaning hours; (d) £34,000 in additional residential staff; (e) £45,000 in specially adapted laptops (£30,000 from ESFA's 16-19 Bursary Fund); (f) £12,000 in additional wireless access points, to support working from halls and converting offices to teaching areas.

⁷ The Office for National Statistics does not hold specific data for post-16 participation by people with or without EHCPs for visual impairments. The University of Birmingham, however, has published extensive analysis of the Labour Force Survey between 2010 and 2015. It's final report highlighted people with a sight difficulty (with no additional health conditions) was twice as likely as the general working age population to be unemployed: <https://www.birmingham.ac.uk/research/victar/research/secondary-analysis-of-the-labour-force-survey.aspx>

automatic entitlement to continued financial support from 19 or expectation that those with an EHCP should stay in education until 25.

3.14: We urge DfE and Treasury to work with the sector to ensure 16 to 25 year olds with EHCPs can make the transition into the workforce. This includes guaranteeing access to jobs and training support in the (delayed) Budget, building on the Chancellor's [Plan for Jobs](#) (8th July) and any additional support from the Winter Economic Plan (24th July), including schemes in planned National Skills Fund from 2021/22 onwards, as announced by the Prime Minister on 29th September. This includes access to the apprenticeships, traineeships and other earn as you learn routes - as well as the [Kickstart Scheme](#) and other routes from Universal Credit to work.

3.15: **Recommendation 6: Ministers publish the SEND Review and set out a post-Covid-19 reform strategy:** We urge DfE and DHSC to accelerate its SEND Review announced in September 2019. We need leadership in Whitehall to deal with the long-term term flaws in the current system and the immediate challenges presented by the Covid-19. To date, there has been no public consultation; no emerging/interim recommendations and no detail on how it will inform the forthcoming FE White Paper, the Spending Review and now delayed Budget.

3.17: The DfE's response in July 2020 to [Education Select Committee](#)'s report acknowledged that "*the SEND system must improve*" but it lacked any immediate urgency about the impact of Covid-19 on young people and their families, let alone any recognition of the future of post-16 providers like RNC. We recognise the Treasury has allocated an additional £780m in 2020/21 and an indicative £730m in 2021/22 for SEND - but the NAO was clear the additional funds in the current financial year are "*insufficient to match the scale of the challenge*" when local authorities are running ever-increasing deficits on their SEND budgets.

3.18: **Recommendation 7: DfE and DHSC to establish RNC as an a national centre of excellence for VI.** We want to pilot a new model for post-school education and training for students with high-impact, low-incidence disabilities. We believe young people with visual impairment should get the intensive, expert support they need, wherever they live. But we have discussed with ministers that the system created by the Children & Families Act 2014 blocks this happening.

3.19: We want to explore setting agreed national criteria for assessment high-impact, low-incidence needs. We work constructively with many local authorities on successful placements. But on the other there is still an entrenched refusal to commission outside the local area regardless of students with VI's level of need or support available for them. This postcode lottery is fundamentally unfair.

3.20: Our proposals in more detail include:

- ringfencing funding for recognised national post-16 providers via central government. This will leave primary decision-making with the local authority and funding the education element of the EHCP, while providing additional protected finance as a grant or bursary to fund specific costs for out-of-area placements (eg transport or residential). This pilot would be assessed against robust criteria, including (a) improved post-16 outcomes; (b) reduction in appeals and tribunals; (c) reduced costs to adult social care and welfare budgets in the case of students with VI, via more young people progressing to university and employment.
- secure new investment to adapt RNC into a national centre of excellence - potentially modelled on the £1.2m Strategic Leadership Hub programme, announced by the DfE and Education &

Training Foundation in June 2019. This will build leadership, capacity and capability for specialist VI provision in the wider mainstream post-16 system. This support package would include building up the national network of qualified teachers of children and young people with visual impairments (QTVI) across general and pan-SEND further education.

- accelerate regional strategic planning: this will allow groups of local authorities to jointly-commission provision for low incidence, high complexity conditions where this is more efficient or better quality in the independent sector. This will cut bureaucracy, costs and duplication from local government operating multiple procedures - as well as ensuring local authorities get maximum value-for-money and return-on-investment from out-of-area placements.

30th September 2020

September 2020