

Written evidence submitted by NAHT (CVD0022)

About NAHT

1. NAHT welcomes the opportunity to respond to the Women and Equalities Committee's call for evidence investigating the impact of coronavirus on disabled individuals and the impact it may have had in terms of accessing services.
2. NAHT is the UK's largest professional association for school leaders. We represent more than 30,000 head teachers, executive heads, CEOs, deputy and assistant heads, vice principals and school business leaders. Our members work across: the early years, primary, special and secondary schools; independent schools; sixth form and FE colleges; outdoor education centres; pupil referral units, social services establishments and other educational settings.
3. In addition to the representation, advice and training that we provide for existing senior leaders, we also support, develop and represent the senior leaders of the future, through NAHT Edge, the middle leadership section of our association. We use our voice at the highest levels of government to influence policy for the benefit of leaders and learners everywhere.

Introduction

4. Schools, colleges and nurseries have felt the full impact of the national emergency and the government's response to it.
5. The majority of schools have remained open throughout the pandemic providing support to pupils and their families both remotely and in person. School leaders and their staff have worked tirelessly throughout; they have reinvented their schools, established remote learning offers and provided care for the most vulnerable. They have responded to endless guidance and updates from the government while supporting understandably anxious staff, parents and pupils. The pressure on school leaders has been immeasurable.
6. Pupils with SEND will undoubtedly be affected by the current situation. In 2019, data from the Department for Education (DfE) on special educational needs in England found that 15% of all pupils have special educational needs in January 2019, with 3.1% of all pupils having an Education, Health and Care plan (EHCP).
7. However, it would be wrong to look at SEND pupils and staff as a homogenous group who will all be affected in a similar way. Pupils and staff with disabilities have a wide range of different and diverse needs and any attempt to consider the impact on this group must take that into account. In addition, disability intersects with other characteristics such as age, ethnicity, gender, sexuality, class and migration status resulting in different effects for different groups of women. In light of this we would urge the committee, to consider this evidence alongside our submissions to their other inquiries, "*Unequal impact? Coronavirus and BAME people*" and "*Unequal impact? Coronavirus and the gendered economic impact*"

8. As outlined above, it is too early to make any reliable judgements about the long-term impact at this stage. In the short to medium term it is clear that there has been an impact on pupils with SEND and their families. Following government advice and the partial closure of education settings from 20th March 2020, local authorities were asked to work with educational settings and parents or carers to determine whether children and young people would be able to have their needs met at home and be safer there than attending an educational setting. As a result, significant numbers of pupils with SEND will have been kept at home. This undoubtedly will have created challenges for some families and for the pupils themselves, particularly where pupils have the most significant and complex needs and specialist provision would normally be delivered at school.
9. In this call for evidence we have attempted to provide an initial evaluation of how the outbreak of COVID-19 is affecting disabled pupils and staff, as well as how the Department for Education and government has handled the situation to date.
10. Given the speed with which the situation continues to evolve, our response must be considered correct in the context of the date at which it is written. It should also not be considered as a comprehensive evaluation of the situation and handling; only in time will it be possible to fully evaluate the impact on disabled individuals, and to assess whether the response was effective in mitigating any such impacts.
11. To support the committee in gathering their evidence, our response has been closely aligned to the terms of reference as outlined.

The effectiveness and accessibility of Government communications and consultation

12. NAHT acknowledge the unprecedented nature of the current situation and the scale of the challenge this has posed for the Department for Education (DfE). In a short space of time officials have had to redesign swathes of existing government policy and procedure as it relates to schools. Almost every single aspect of school policy has been affected by this crisis, and will continue to be impacted for a long-time to come.
13. One of the most significant frustrations for school leaders throughout the crisis has been the delay in government guidance being published. This has meant that school leaders have felt they've been left to fend for themselves and it has meant that NAHT has felt compelled to step forward and provide detailed advice and guidance where it is lacking from the government.
14. For those members working in special schools, alternative provisions and residential settings, this has only been exacerbated – with guidance for these parts of the sector, typically released much later than for mainstream counterparts. Given the nature of the settings, which typically provide support to some of the most vulnerable pupils and/or those with the most complex needs, adding further delays to what is already a more complicated situation and requirements is unacceptable.

15. NAHT's own survey data showed that the demand on special schools for places was overall much higher than mainstream schools, especially at the beginning of lockdown wherein some cases as many as 70% of pupils were attending school in the week beginning 23rd March 2020. DfE attendance data has consistently shown higher attendance throughout April, May and June in special schools, when compared to mainstream schools. For example, on 7th May attendance at special schools was 7%, triple the overall attendance rate (2%) and on June 11th attendance was 13% compared to 9% overall. In particular, attendance at special post-16 institutions has been between 50-70% since the 23rd March 2020. Most recently, on June 25th attendance was at 63%. This has put significant pressure on those schools, especially in terms of staffing and their ability to sustain any social distancing measures.
16. School leaders have also been highly frustrated that they have often found out about major school-related policy announcements via the mainstream media. This has placed them in an invidious position, as it means that sometimes parents have heard the news ahead of the school leaders who are being tasked with implementing the policy. The announcement that Free School Meal vouchers would be available over the Easter holiday during a Saturday afternoon Downing Street press conference serves as a good example of this. Similarly, school leaders had no advanced warning of the announcement that schools would be closing for the majority of pupils on 20th March 2020.
17. In addition, guidance for the sector is often released late at night and/or over weekends, across multiple documents; with updates and revisions to guidance often being extremely unclear. This not only increases workload for those working in schools, but makes it extremely difficult for the sector to understand and implement what is required.
18. For SEND settings in particular, specific SEND relevant advice is often found within generic / mainstream documents, or SEND school leaders are directed to refer to relevant healthcare sector documentation. This, combined with the failure to list the information changed or added in updated advice, frequently results in school leaders of special schools having to unnecessarily read and / or re-read additional irrelevant documentation in order to find SEND pertinent advice.
19. To support our understanding of the above issues, NAHT ran a member survey focused on special schools and alternative provision settings from 4th - 10th June 2020, receiving 578 respondents. In the survey we asked members about their views on the Department for Education's guidance, supporting schools during the pandemic.
20. When asked about the DfE's Covid-19 guidance for special schools/alternative provision **86% of respondents** did not agree that DfE guidance had been published in a timely manner.
21. The impact of this is clearly demonstrated in the fact that **nearly three quarters (73%) of respondents felt that the delays in producing appropriate DfE guidance had affected their setting's ability to make effective planning decisions.**
22. Even when the guidance was published many found the information provided to be insufficient; **75% of respondents to our survey disagreed that the**

DfE's guidance had supported their setting to effectively plan their provision during the coronavirus pandemic.

23. This has meant that for many, they had no choice but to look elsewhere for support and/or be involved in developing their own.
24. Over half (54%) of respondents to our survey reported that they had been involved in producing additional guidance to supplement the DfE's guidance, and the majority of respondents (81%) had used guidance published by external sources to supplement the DfE's guidance.
25. The guidance around Personal Protective Equipment (PPE) has been a particular issue, with a lack of clarity and conflicting messages contained within it.
26. At the beginning there were significant delays in the production of any clear guidance regarding comprehensive safety measures schools should be taking and the role of PPE. Guidance on such safety measures was only issued a number of weeks after schools had already been operating this reduced provision model and even then was not comprehensive. Specific information relating to PPE remained absent for a substantial period of time.
27. As outlined above, when guidance was eventually released it was often deemed insufficient for the requirements of the schools. In our survey of members, outlined above, nearly three quarters (73%) of respondents felt that the DfE's guidance on the use of PPE did not meet the needs of pupils and staff in their setting.
28. When guidance was published it was very limited and did not prove helpful in many cases. There was also a clear lack of understanding about many of the roles that those working in special schools undertake in order to effectively care for pupils; with schools undertaking many procedures that also occur in clinical settings. However, such provision was not reflected in PPE guidance for these settings, with advice often conflicting with that given for those working in clinical settings, even in scenarios where schools were undertaking the same procedures; putting both staff and pupils at greater risk.
29. For example, initial advice on PPE failed to understand or acknowledge the type and complexity of Aerosol Generating Procedures (AGPs) that routinely take place within the SEND sector. Early advice suggested that no additional PPE would be required to support children and young people in schools. However, many present complex needs, requiring close, intimate care in special schools, and it was sometimes left to local organisations, such as individual local authorities, to work directly with healthcare bodies in order to provide accurate, science-led PPE guidance for the SEND sector. Concerningly, NAHT members *continue* to report concerns about safely delivering APGs, as meeting the guidance's requirement for APGs to now take place in well ventilated rooms will be difficult in many settings.
30. This was a critical issue within special schools, who faced specific and significant challenges in terms of providing the 'reduced provision'. Many were not able to reduce pupil numbers in the way that the majority of mainstream schools were able to, and this, coupled with the complex needs of their pupils, made any form of social distancing very difficult to achieve. For example, many of these schools carry out personal care for pupils and also

have to manage extremely challenging behaviours, including spitting and the need for physical intervention. As outlined above, in the first few weeks of schools remaining partially open there was inadequate guidance on what PPE should be used.

31. These concerns are reflected in the findings from our member survey, which we undertook with our members working in special schools and alternative provision settings in early June, as outlined above.
32. For the majority of respondents (87%) reported that it has been necessary to increase the use of PPE in their settings during the Coronavirus pandemic.
33. As part of this research, 45% of respondents also raised concerns about the suitability of PPE for pupils with particular needs. For example, the suitability of using facemasks when working with pupils with a hearing impediment, which has not been addressed effectively in government guidance.
34. Another significant area, particularly affecting special schools, that has had a disproportionate impact upon pupils with SEND and their families, is transportation. A number of factors have failed to be adequately addressed in subsequent government guidance.
35. Frequently, the guidance concerning transport fails to recognise the scale, distances and special provision required to bring pupils to and from special schools safely. In addition, as contracts for transport are often organised and held at local authority level, adjusting such provision to support recommended staggered arrival / departure times, is not within the control of individual school settings. For example, some SEND settings service more than one local authority area and rely upon small vehicles to transport pupils with complex needs over significant distances – ensuring adequate social distancing and cleaning routines in such vehicles is practically impossible. This has resulted in reduced transport capacity, meaning a disproportionate impact on such pupils and their families.
36. In our recent survey (outlined above), we also asked our members from special schools and alternative provision about the challenges they face with school transport.
 - a) 70% of members felt that there is a lack of capacity to implement social distancing on school transport.
 - b) 67% were concerned about the ability of transport operators to adhere to appropriate hygiene and infection control measures
 - c) Over half (55%) face difficulties arranging ad hoc transport to take pupils home if they display symptoms
 - d) Over half (53%) felt there is a lack of school transport capacity to implement staggered drop-off and collection times

Looking forward

37. Throughout the pandemic, NAHT has maintained a clear and consistent position regarding increasing the number of pupils in schools: that schools should return when it is safe to do so. Safe for pupils, parents and staff. NAHT members want to see their schools re-open to as wide a range of pupils as possible, but they need to be reassured that it is safe to do so as it

will be they who face the myriad of questions from parents on the school gate.

38. To support this, NAHT believes that the government needs to clearly explain the scientific evidence that underpins any decisions they take on the further opening of schools.
39. Schools need to give careful consideration to the reintegration of pupils with SEND when looking at the return of all pupils to school. In some cases, pupils with SEND will face additional challenges and may find readjusting to school life difficult. Schools need to be given the time, space and resources to support these pupils to make that transition. Although the shielding requirements will be dropped by September, schools need to be supported to comprehensively risk assess for certain pupils and staff who may have previously been shielding to ensure that returning to school is safe. The issues related to intimate care, transport and EHC plan provision outlined above are likely to be challenging for a significant period into the next academic year, and will require time for carefully planning and effective implementation.
40. Of particular concern to our members is the provision for pupils who are ventilated or require cough-assist and are, therefore, continuously generating aerosols, and for pupils who may require rescue breaths as part of cardiopulmonary resuscitation (CPR). Whilst only a small number of pupils may require this intervention, staff in special schools do have to administer rescue breaths. Therefore, clearer guidance is required on this from the Department for Education and Department for Health and specialist masks may need to provide to certain settings by September.
41. The government needs to be clear that it understands all the different settings in the system, and is able to provide timely, and useful advice for all. Guidance for special schools should form the basis of the government's response and should be released in parallel with mainstream advice; it should not be an adapted, tacked on version of that which applies to mainstream settings. Accessibility for all, should be front and center of all considerations.
42. Many schools, for example, will have been unable to undertake the physical adaptations required to enable full accessibility for newly admitted disabled pupils during lockdown due to building restrictions; and there is likely to be a backlog as building services, and the requisite supply chain, come back online in the coming weeks. Essential adaptations required for disabled pupils will need to be prioritised otherwise, once again, these pupils will be further disadvantaged by Covid-19.
43. Whilst NAHT welcomes the fact that the guidance for SEND schools (to support schools in bringing back all pupils in September), has been released alongside the mainstream guidance, it once again fails to recognise the degree of complexities within the sector, nor does it offer comprehensive support on how to effectively keep staff and pupils safe. Furthermore, there is little recognition or reference to the range of support services that SEND pupils will require to support them in a full return to schooling, continuing to place the emphasis on schools. This demonstrates an ongoing lack of understanding about where responsibilities or expertise actually sits, increasing the risk that pupils won't get the support they really need.

44. In addition, the timing of the guidance release (only two weeks ahead of the school holidays), leaves them with even more limited time to implement any changes and requirements, and to inform parents and pupils about what to expect in September, something that is particularly critical for supporting many SEND pupils in a return to school.

Access to food and the effectiveness of the Government's response to reported problems;

45. The government's national, free school meal voucher scheme, whilst well-intentioned, was not fit for purpose, and has been one of the clearest policy failures of this crisis.
46. Schools reported a catalogue of issues, including an inability to log into the website, excessive delays in using the website and frequent crashing of the site, extended delays in receiving any vouchers and parents experiencing problems with the vouchers once they have been issued. The consequence of all of this was that families did not receive the vouchers they needed and schools were forced to step in and make alternative arrangements.
47. Independent special schools (including residential settings) often have places taken up by a number of different Local Authorities on behalf of their pupils. As in similar circumstances previously, these independent settings were not included in the Free School Meal (FSM) voucher scheme. It meant that certain eligible children and young people who attended such settings could not access FSM support even though they qualified for it. It is worth noting that significant numbers of the most high needs and complex pupils in the country are supported in this sector. Each pupil will have an EHC plan and are, therefore, Local Authority pupils who should retain as much entitlement to FSM funding as anyone else. Government continually fail to recognise that it is the pupil who must retain the entitlement and not the school setting.

Access to healthcare services, including treatment for COVID-19;

48. The decision to temporarily relax the legal duty to secure or arrange the provision set out in an Education, Health and Care (EHC) Plans and to replace it with a duty to use 'reasonable endeavours' was a pragmatic decision given the circumstances. As previously explained, the partial closure of schools meant that some aspects of provision outlined in EHCPs became very difficult and in some cases impossible to meet.
49. A recent survey with our members working in the special education sector, found that over two thirds (70%) of respondents have utilised the temporary statutory changes to EHCPs to adapt provision for pupils in their setting, suggesting that this was a necessary alteration in light of the pandemic.

50. However, **NAHT is clear that this should only be a short-term measure, and that the changes should remain in place for the minimum possible time.** This means that EHCP provision previously provided by other sectors, notably health, needs to be reinstated as soon as possible, as many schools simply do not have the resource or expertise to undertake this on behalf of children and young people.
51. Whilst members have generally welcomed the flexibility that these temporary alterations have provided, there has been some concern that this will result in provision being picked up by schools, possibly without the support of Local Authorities (and in some cases, with unhelpful pressure from their own local authorities, to do so) and/or that there would be a reduction in health and care support for pupils.
52. As mentioned previously, NAHT ran a survey focused on special schools and alternative provision settings from 4th June- 10th June 2020 with 578 respondents. Over half of respondents (59%) reported that they have found it difficult to maintain the necessary health care support for pupils that require it, during the coronavirus pandemic. And when we asked how respondents had utilised the temporary statutory changes to EHCPs, one of the top changes was a reduction in the support provided by health and social care services.
53. There was particular concern about access to healthcare and support for pupils at the beginning of the lockdown, in light of the fact that the original advice to healthcare professionals was to “not attend school sites.” This disproportionately impacted on SEND pupils, as they were unable to access this critical support elsewhere. For example, certain specialist health provision, identified in a pupil’s EHC plan, in ordinary circumstances may be provided and administered by peripatetic health staff travelling between settings (both mainstream and SEND). However, as health staff were frequently pulled in to the essential Covid-19 NHS response and / or advised not to physically attend other settings, the ability of schools to maintain this provision for some of their pupils was adversely affected.
54. NAHT is concerned that the pandemic will have exacerbated existing issues in children’s health services. Prior to this crisis, these services were already at capacity and the coronavirus pandemic will likely have increased the demand for these services. A recent report by the Disabled Children’s Partnership found that as a result of lockdown parents/carers reported a negative impact on their disabled child’s learning and communication (86%), general health (67%) and disability or condition (64%).
55. The resource and capacity of these services are critical in supporting pupils in a wider return to school too; schools cannot manage this alone. NAHT is particularly concerned about the capacity of mental health services and social care as there is likely to be upsurge in demand as a result of the effects of lockdown on vulnerable children and their families.
56. A survey of 653 school leaders at the end of 2019 found that just 4 per cent of school leaders agreed that Child and Adolescent Mental Health Services (CAMHS) **responds quickly** to requests for support. Just 5 per cent agreed that children referred to CAMHS **get help when they need it.** Our June 2019 survey on the crisis in supporting children with SEND found that 83% of respondents were not receiving ANY funding from health and social care budgets to support pupils with statements or EHCPs, while 30% of

respondents were not receiving services from health and social care to support their pupils.

57. NAHT is also concerned that the government has thus far failed to consider how the system will be able to transition from these temporary measures, back to the duties and requirements that many individuals need to ensure that they are supported effectively by all services. During lockdown, it has become clear how the level, type, responsiveness and capacity of school-based provision delivered by the health sector, for example, adversely affects children, young people and their families when pressure is exerted elsewhere in the system. Evidence from the Covid-19 response suggests that to ensure the quality of education of pupils with SEND is not compromised, sufficient funding and resource is required in each requisite sector – education, health and social care – as each relies upon the others.
58. NAHT is also concerned about the accessibility of Covid-19 testing and treatment for children with SEND and the expectation that schools will be distributing home testing kits. The invasive nature of the Covid-19 test makes it difficult to administer to some pupils with SEND. Our members have also raised concerns about the capacity of families of children with SEND to administer tests to their children. In particular, members are concerned that the instructions to the home testing kits are hard to comprehend and inaccessible for some families of children with SEND. This is a significant challenge for ensuring that children with SEND are tested for Covid-19 as part of the government's test and trace processes. Members have also raised concerns about the capacity of some disabled adults whom may struggle with the management of information and social imagination required to trace their social contacts.
59. The public health requirements for health care staff to wear PPE also presents a challenge for some children with SEND who may have communication difficulties. In particular, the wearing of facemasks, although a necessary protection measure, prevent effective communication with individuals who are deaf or hard of hearing. It is essential that the government addresses this issue and procures appropriate facemasks for use in these situations.

Ill-health retirements

60. We have been contacted by a number of members who have been unable to progress their ill-health retirements, either due to being unable to obtain the medical evidence required from medical professionals whose resources are currently focused elsewhere in light of the pandemic and/or are unable to demonstrate they have completed 'all reasonable treatment,' as many treatments have been cancelled or postponed.
61. Members have contacted us after having been told that no Local Government Pension Scheme (LGPS) ill-health pensions are being processed, or that occupational health is not operating as GPs have been deployed to the front line (and thus cannot complete assessments for ill-health retirements under either the LGPS or Teacher Pension Schemes (TPS)) or having their applications to the TPS for ill-health retirement locked in closed down council buildings and more.

62. These blockers and/or delays can (and have) resulted in members being financially impacted, sometimes significantly, with many moving through the sick pay process, dropping from full pay to half pay and for some even moving to no pay.
63. This is both an issue in the short-term but will also likely have longer term implications too. Even when things begin to return to 'normal' there likely will be significant delays in processing medical evidence, and then the ill-health applications themselves.

The mental health of disabled people including the effects of isolation, access to mental health services and the implications of temporary changes to the Mental Health Act

64. The coronavirus pandemic is unprecedented, and therefore we don't know what the exact impact will be on individuals, and everyone will react differently.
65. As we outlined in the beginning our statement, we must ensure that we do not consider SEND pupils as a homogenous group who will all be affected in a similar way. Significant numbers of children and young people, particularly in SEND sector, have actually benefited in terms of their mental health and wellbeing during this period; many pupils, who find the formality of schooling very challenging have been reported to be feeling less anxious during this period.
66. NAHT members have reported that lots of families and children have actually benefited from time together at home; some parents of pupils with SEND have shared with real pride how their children have developed many domestic and independence skills, of which they are very proud.
67. However, this is not to say that all students will have found this to be the case and there will be groups of children and young people for whom the impact of the coronavirus pandemic has created more serious levels of concern. These pupils will need additional support and it is likely that some will need more specialist help from health or social care services.
68. For pupils with social, emotional and mental health needs (SEMH) and those with autism spectrum disorder (ASD), the challenges during lockdown will have been significant. The loss of daily routine, access to support provision and reduced social interaction with peer group and school staff will have had a profound effect for many such children and young people. Frequently, schools provide ongoing, reliable support and are often the hub through which mental health support is channelled. The challenge for the wider system in maintaining such support during reduced school opening was evident and it will remain to be seen whether pupils with needs such as SEMH and ASD will now require additional support as schools open more widely.
69. NAHT is concerned that the pandemic will have exacerbated existing issues in children's mental health services. Prior to this crisis, these services were already at capacity. A report from EPI in January 2020, found that only one in

three children with a diagnosable mental health condition were accessing treatment, and a quarter of referrals to CAMHS were not accepted in 2018/19. The coronavirus pandemic will increase the demand for these services. A recent report by the Disabled Children's Partnership found that as a result of lockdown parents/carers reported a negative impact on their disabled child's learning and communication (86%), behaviour and emotions (87%), mental health (78%). The resource and capacity of these services are critical in supporting pupils in a wider return to school; schools cannot manage this alone.

70. It is possible that the coronavirus pandemic and lockdown may result in increases in behavioural difficulties with some pupils, who struggle to adapt to the new change in routine, and a full return to a school environment that may look very different to that which they knew before. For example, there is genuine concern from some that, for a number of returning pupils, there is an increased risk of exclusion as a result of potentially more challenging behaviour coming from trauma they may have experienced during lockdown.
71. In our special school survey of members undertaken in early June, 82% reported they were worried about managing potential increases in challenging behaviour from pupils and 82% reported concern about supporting pupils with their emotional wellbeing and mental health (82%).
72. The government needs to properly engage in the SEND agenda and ensure that they understand and properly plan the return of increased numbers of pupils in September and beyond. The schools settings will continue to be very changed and a return is likely to cause increased anxiety to many, unless it is done effectively with a focus on mental health and wellbeing support as the front and foremost concern.
73. We also need to ensure that the mental health and wellbeing of school staff and school leaders who have a disability is being considered and looked after.
74. Even before this crisis occurred, the mental health and well-being of teachers and school leaders was a key concern. According to the latest research by Education Support Partnership, 75% of all education staff have faced physical or mental health issues in the last two years because of their work and 53% have considered leaving as a result - workload and work-life balance were cited as the top work-related reasons.
 - a) Almost one in five (19%) said they had experienced panic attacks
 - b) Over half (56%) had suffered from insomnia and difficulties sleeping
 - c) Over a third (41%) had experienced difficulty concentrating
75. Previous evidence from our own member survey¹ found that over three quarters of respondents told us that in the last year their role had: a negative impact on their family or personal life yet (77%); reduced time spent with family or friends (75%); or led to an increase in work-related worry, fear or stress (75%). Approaching two-thirds (61%) of respondents stated that their role had a negative impact on their mental health and over half (52%) said that their physical health had been affected.

¹ NAHT's recruitment and retention survey 2020 (unpublished)

76. This situation is only going to have been exacerbated in the current climate. Schools, colleges and nurseries have been asked to take on an entirely different role to the one they ordinarily play in society and to fundamentally transform how they operate. The government tasked the sector with making this transformation in a matter of days and with very limited guidance on how to do it. The scale of the challenge faced by the sector was enormous and unprecedented.
77. Early results from an on-going NAHT member survey² on wellbeing and workload, undertaken during the coronavirus pandemic, shows that these pre-existing issues have been exacerbated. Focusing just on responses members who identified as having a disability, it suggest that members with disabilities have disproportionately experienced negative physical health impacts as a result of the crisis.
- a) 16% of members with a disability reported that they had experienced symptoms of coronavirus (compared to 11% of all members),
 - b) 38% had experienced flare-ups of existing health conditions (compared to 14% of all members)
 - c) over a quarter (26%) had had treatment for existing health conditions disrupted (compared to 8% of all members)
 - d) 74% reported that they had experienced a negative impact on the quality and/or quantity of sleep (compared to 69% of all members)
 - e) 69% had experienced physical exhaustion (compared to 60% of all members).
78. The majority of respondents from members with a disability (88%) stated that the coronavirus pandemic has negatively affected their mental health (compared to 81% of all members) and wellbeing but only 19% reported that they had accessed professional support. The main causes of this negative impact were:
- a) government guidance (including delays, frequency of updates, timing of updates) (86%)
 - b) an increase in workload (84%)
 - c) concerns about the mental health and wellbeing of staff (75%)
 - d) keeping staff protected from coronavirus in school (78%)
 - e) keeping pupils protected from coronavirus in school (69%)
79. Of note is that almost half (49%) of respondents with a disability had personal concerns about health (compared to 26% of all respondents).
80. Nearly all respondents (98%) said that their workload has increased during the pandemic (71% said greatly increased). The majority had regularly been working weekends (71%) and evenings (79%). Crucially, 41% reported that there had not been a weekend or weekday they had not worked since 16th March 2020.
81. It is NAHT's view that the way government has handled the impact of the current crisis on schools, has increased the stress and workload for school leaders. For example, guidance for the sector has often been released late at

² NAHT launched the survey on 6th July and data was taken from the 8th July; the survey remains open at the time of writing, so these findings should be taken as an indication, ahead of the full analysis.

night and/or over weekends, across multiple documents; with updates and revisions to guidance often being extremely unclear.

82. In our recent survey³, outlined above, one member stated that *'I suffer from a chronic pain condition which has led to severe sciatic nerve irritation that started in February and is still ongoing. I have worked every day, either in school or at home, with chronic pain. My deputy is new in post so some days I know I have been unfit for work but had to go in. I am physically and emotionally drained and getting very little job satisfaction.'*
83. Another member stated: *I have been shielding so all of my work has been from home and I have been trying to support staff parents and children when my information is restricted to reports via internet phone etc I have very limited vision do this has made things difficult I have had to write reports for children in classes where staff are signed off due to stress/breakdown and interview via zoom to replace staff who have resigned*
84. Another member stated: *'As a headteacher who is clinically extremely vulnerable and therefore having to shield, it has been very stressful. It isn't the extra workload as much as the bombardment of government directives and constantly monitoring what is happening in school from afar. Some of the guidance from the government has had me wondering if they have met a child or been in a school and they clearly have no respect for school staff.'*

Access to education

85. NAHT's own survey data showed that the demand on special schools for places was overall much higher than mainstream schools, especially at the beginning of lockdown where, in some cases, as many as 70% of pupils were attending school in the week beginning 23rd March. DfE attendance data has consistently shown higher attendance throughout April, May and June at special schools. For example, on May 7th attendance at special schools was 7%, triple the overall attendance rate (2%) and on June 11th attendance was 13% compared to 9% overall. In particular, attendance at special post-16 institutions has been between 50-70% since the 23rd March. Most recently, on June 25th attendance was at 63%. This has put significant pressure on those schools, especially in terms of staffing and social distancing measures.
86. During the period of closure, schools have worked hard to support pupils with SEND and their families. NAHT is aware of examples of schools putting advice and resources on their website that parents can access and use at home. Staff in many schools have been in regular contact with families to check on the well-being of pupils and to offer support and advice to parents. Schools have also considered carefully how to provide appropriate learning resources for pupils with SEND, taking into account the unique needs of their cohorts.
87. NAHT ran a member survey from 6th to 11th May 2020 on the support schools were offering pupils. In relation to provision of educational activities, of the 204 special school respondents, 90% were sharing existing online resources, 88% were providing physical resources such as books, 72% were liaising with parents/carers to ensure accessibility of home learning for pupils and 60%

³ Ibid

were providing offline versions of online resources for pupils without the necessary technology or internet connection (e.g. print outs).

88. In relation to pupil support, of the 204 special school respondents almost all (99.5%) had been conducting regular telephone calls to vulnerable pupils and/or their families at home, 89% had had online contact with vulnerable pupils and/or their families at home, 94% had been liaising with social care to ensure continued provision of support, 76% had been liaising with health care services to ensure continued provision of support and over half (57%) had been providing access to school-based welfare support.
89. Members have reported that there have been additional challenges in providing effective home learning opportunities for pupils with SEND. In many cases, this is because of the critical role skilled professionals play in overcoming language and communication barriers when pupils are in school.
90. NAHT is concerned that these additional challenges and the time away from school will widen the already sizeable attainment gap for SEND pupils. According to a 2018 report from EEF 'closing the attainment gap' the attainment gap is largest for pupils with SEND. According to 2020 DfE data, at KS2 22% of pupils with SEN achieved the expected level in reading, writing and mathematics in 2018/19 compared to 74% of those with no SEN. At KS4 the average attainment 8 score for pupils with SEN in 2018/19 was 27.6 compared to 49.9 for those with no SEN. The average progress 8 score for pupils with SEN in 2018/19 was -0.62 compared to 0.08 for those with no SEN.
91. NAHT has also been concerned that at no time in the Department for Education's plans around supporting disadvantage pupils with laptops/devices to support their engagement with online and remote learning, has there been a discussion of providing pupils with SEND assistive technologies, which for many pupils with SEND are critical aids to supporting their learning.
92. As we outlined in the guidance section, the online resources being developed to support schools with this new offer, are skewed towards those working in mainstream settings, with resources for SEND pupils often appearing at a much later date and with limited use. Once again, it appears that the development of support for SEND pupils is not of the same standard as that available for mainstream students, exacerbating the challenges outlined above.
93. Another significant area that has affected the access to schools for pupils with SEND is transport. Government guidance concerning transport has frequently failed to recognise the scale, distances and special provision required to bring pupils to and from special schools safely. In addition, as contracts for transport are often organised and held at local authority level, adjusting such provision to support recommended staggered arrival / departure times, is not within the control of individual school settings. For example, some SEND settings service more than one local authority area and rely upon small vehicles to transport pupils with complex needs over significant distances – ensuring adequate social distancing and cleaning routines in such vehicles is practically impossible. This has resulted in a reduced transport capacity and disproportionately affected such pupils and their families.

94. In our recent survey, we asked our members from special schools and alternative provision about the challenges they face with School transport.
- e) 70% of members felt there is a lack of capacity to implement social distancing on school transport.
 - f) 67% were concerned about the ability of transport operators to adhere to appropriate hygiene and infection control measures
 - g) Over half (55%) face difficulties arranging ad hoc transport to take pupils home if they display symptoms
 - h) Over half (53%) felt there is a lack of school transport capacity to implement staggered drop-off and collection times

Summer 2020 examinations

95. Since the pandemic began, NAHT has been regularly engaging with Ofqual, the exam regulator and awarding organisations on the exceptional awarding arrangements for Summer 2020.
96. For general qualifications (GQ) and some (but not all – further details below) vocational and technical qualifications (VTQs) this summer, schools and colleges have been asked to use their professional experience to make a fair and objective judgement of the grade they believe a student would have achieved had they sat their exams this year, termed as ‘centre assessed grades.’
97. Whilst there is not a perfect solution, NAHT believes that this approach is pragmatic and the fairest method to take in these exceptional circumstances.
98. Nonetheless, throughout our engagement with Ofqual, the Department for Education and awarding organisations, we have raised a number of concerns about the potential disproportionate impact certain arrangements in this process might have on pupils with SEND (and other groups), which we outline below.
99. As outlined above, this year schools and colleges are submitting a centre assessed grades for students planning to take exams this year. However, these calculated results may not be available for pupils with low attendance rates as teachers may not have enough evidence to base a grade on. Additionally, Ofqual’s equality impact assessment on these exceptional awarding arrangements highlighted that groups with lower attendance often receive a lower teacher assessed grade than their achieved assessment grade. This is an issue for pupils with SEND as on average they have lower attendance rates. Pupils with a Special educational need (SEN) statement of education healthcare plan have been found to have an absence rate (8.7%) - double the rate for pupils with no identified SEN (4.3%)⁴.
100. Private candidates, accepted by Ofqual as likely to represent a proportionately higher number of learners who are educated at home for reasons of a special educational need or disability, have also been disproportionately negatively affected by exam cancellations as they are not likely to be engaged with a centre who can provide them with a centre

⁴ [Pupil absence in schools in England: 2018 to 2019](#)

assessed grade this summer 2020. This means that for the majority of these learners, most will be required to partake in the proposed autumn exam series in order to secure their grades, potentially delaying their opportunity for progression.

101. The arrangements for VTQs have been more complicated, as the exceptional arrangements are not consistent across all qualifications. For some qualifications a centre assessed grade and rank order can be provided, in line with the approach taken for GQs, but for other qualifications pupils may sit adapted qualifications from home or have their assessments postponed.
102. More students with SEND take vocational and technical qualifications as opposed to general qualifications and are therefore more likely to be impacted by these arrangements. For example, DfE data from 2019 on non-GCSE qualifications in England 2019 shows that 15% of all pupils at the end of KS4 were pupils with SEN. However, these SEN pupils were over-represented in level 1 and level 2 Technical Awards, representing 53% and 16% of entries respectively.
103. NAHT understood the need for flexibility in the approaches to awarding vocational and technical qualifications, but have been clear that a calculated result should be awarded wherever possible. For those qualifications where there was no option but to offer an adapted assessment, we raised our concerns about the accessibility of these adapted assessments for students with SEND and stressed the need for careful thought to be given to how it could be made fully accessible to the full cohort of students taking it. Students' progression to further education, training or employment may be negatively impacted if they were denied access to any necessary adapted assessments, causing further unfairness and disadvantage.
104. Ofqual have rightly highlighted the fact that students with SEND are more likely to be over-represented within the group of students for whom delayed assessments is the only option.
105. A delayed assessment will likely delay or disrupt any planned progression onto higher level course or into new educational settings. For example, if a student achieves a Level 1 BTEC they are then able to progress on to a Level 2 course which they couldn't access without four GCSE passes. For some students with SEND, GCSE's are not accessible, but Level 1 BTEC is and it allows them a gateway to a higher level qualification which they are capable of achieving in.
106. Students may have to return to their current education setting to complete assessments. Transitions can be particularly challenging for students with SEND and many of the supportive activities around these transitions will have been halted due to Covid-19. Therefore, delaying assessment will exacerbate these challenges. It may also cause capacity issues for special schools and other educational settings, where they have are supporting more students than expected for the upcoming academic year.
107. There will be a number of students with SEND for whom a delayed assessment may also prevent progression into employment or training. In addition, the lack of progression as a result of a delayed assessment may also affect a student's sense of personal achievement, self-esteem and

confidence as these students would not be able to complete their intended goals for that academic year.

108. NAHT members who are leaders of special schools have raised significant concerns about the impact on their students if they are not awarded a grade.
109. One of our members articulates the issues clearly: *“Generally speaking the pupils we enter for these qualifications fall into one of two categories. They are either our less academically able who may have been out of formal education for some time before being placed with ourselves so vocational qualifications are a good way to re-engage them in academic work without over-facing them and whilst building self-confidence and self-esteem. The second group tend to be younger pupils who are academically able but we use Functional Skills exams as an opportunity for them to build confidence and self-esteem, as well as exam technique. All of our pupils are on the autism spectrum and although all very individual what they have in common is massive anxiety and little confidence in themselves as learners. This has to be built gradually and these qualifications are a vital tool in that process. Without them our task becomes exponentially harder. The impact on any of our students not awarded something this summer after, in their view, working hard for all but the last 2 months, would be devastating and undo years of rebuilding work.”*
110. Delaying assessment for students with SEND may also lead to a widening of the existing attainment gap. For example, the DfE’s KS4 2017/18 destination data shows that pupils with SEN are less likely to have any sustained destination than those with no identified SEN of whom 90% went onto education, employment or apprenticeships compared to 95% of those with no identified SEN. As students educational progression will be affected by delaying assessment, it is possible that this gap will be widened under the current proposals.
111. Looking forward to the proposed autumn exam series, NAHT believes that there are a number of student groups, including SEND pupils, that may be disproportionately negatively affected by the proposed arrangements for an autumn exam series.
112. In particular, we have raised serious concerns with the exam regulator, Ofqual, that the exclusion of non-exam assessment, is likely to have a particular impact on students with SEND, considering that such students, may perform better in this format of assessment.
113. It may not be feasible for some students with SEND to take assessments in Autumn 2020. Many of them may be in the high-risk category in relation to the Coronavirus. These students may be some of the last to physically return to school and may have spent significantly more time out of school than others. Therefore, NAHT is also concerned about what arrangements will be made for students who may need to continue to shield at home. It is crucial that proactive and pragmatic arrangements are considered now to ensure that these students can take exams if they wish to, as there is a real possibility that some students will not have returned to school by the autumn exam series.

114. NAHT has urged the exam regulator, Ofqual, to go beyond recognising which groups will be disadvantaged and set out a more detailed plan of how the impact of these disadvantages will be monitored, accounted for and negated in their proposals for an autumn exam series.
115. Any exam series has significant implications on the running of a school. NAHT is particularly concerned about the impact of this on special schools and colleges, who will be supporting students for whom the transition back to school may be particularly challenging.
116. NAHT has been advocating that the Department for Education and Ofqual look at holding the autumn exam series in local hub centres in order to mitigate at least some of the potential negative impacts of the autumn exam series proposals on particular groups of students. Significantly, it would reduce the chances of further exam cancellations or delays in light of future public health requirements and potential future school closures. The further cancellation of exams would be significant for private candidates, of whom a notable proportion are students with SEND. For these students, future exam cancellations may prevent any progression this year and cause further disruption to their education and wellbeing.
117. Local hub centres would also make the exam series more accessible for some students with SEND for whom transport can be an issue. NAHT also believes it would be easier to organise social distancing in local hub centres which would increase the chances of medically vulnerable students being able to take their exams.
118. Unfortunately, the recent announcement from Ofqual has confirmed that this approach will not be utilised and NAHT remains concerned about the impact that such a decision will have on SEND pupils.

Looking forward

119. As part our survey to our members working in special schools, undertaken in June 2020, and outlined previously, we asked members about their concerns in relation to returning to school at a later date. The top four concerns were:
- a) supporting new pupils starting at your setting (90%)
 - b) settling pupils back into school follow disruption to their routines (84%)
 - c) managing potential increases in challenging behaviour from pupils (82%)
 - d) supporting pupils with their emotional wellbeing and mental health (82%)
120. In addition, just over two thirds (68%) reported that they are concerned about pupils who may continue to shield at home.
121. School leaders in special schools have also raised two further concerns when looking forward to a September full school reopening. As a result of lockdown, many building adaptations required to enable full accessibility for new pupils with SEND have been significantly delayed; in addition a number of pupils will have experienced a delay in confirming their school admission.

122. In our recent survey over a quarter (28%) of respondents indicated that physical adaptations are not in place for new pupils due to attend their setting. In combination, both the pause to physical reasonable adjustments and the delayed place confirmation risks further disadvantaging these children and young people and the result could mean a further unfair delay to their school return. It is worth noting that both of the above issues rarely remain within the gift of schools to directly influence.

Intersections with race

123. The DfE's 2019/2020 data shows that 3.3% of all pupils in England have an Education, Health and Care (EHC) plan and 12.1% have Special Education Needs (SEN) support but that there are higher rates of EHC plans and SEN within certain ethnic groups. The highest rate of EHC plans and SEN support was within the White- Irish traveller community, as 5% of pupils have an EHC plan and a quarter have SEN support. 4.7% of all pupils from Black Caribbean background had an EHC plan. This is the second highest rate within an ethnic pupil group, followed by pupils from 'any other Black background'. The second highest rate for SEN support is within the White-Gypsy/Roma pupil group at 22.6%.

124. NAHT has detailed the issues facing pupils from BAME communities during the Covid-19 pandemic in its submission to the *"Women's and Equalities Committee inquiry 'Unequal Impact? Coronavirus and BAME people"*. Therefore, NAHT calls on the committee to also consider that the negative effects of coronavirus on individuals from a BAME background set out above will intersect with the effects on individuals with SEND.

July 2020