

department for

education and skills

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WEST MIDLANDS

Removing Barriers to Achievement –
The Government's Strategy for SEN

Regional Overview

February 2005

1. Basic information	
SEN Adviser:	Margaret Davies
Name of Region:	West Midlands
Date of report:	January 2005
Members of West Midlands:	
<ul style="list-style-type: none"> • Birmingham • Hereford • Solihull • Telford and Wrekin • Wolverhampton 	<ul style="list-style-type: none"> • Coventry • Sandwell • Staffordshire • Walsall • Worcestershire
<ul style="list-style-type: none"> • Dudley • Shropshire • Stoke on Trent • Warwickshire 	

2. Background

This overview is compiled from information gained from visits to local authorities by respective DfES SEN Advisers, covering the period September 2004 to December 2004.

Although original plans did not include producing a regional overview, it was felt that it would be very helpful to do so.

All authorities in the region have been visited for the purposes of this regional overview.

Prior to meeting with relevant local authority officers, discussions were held with the relevant CSIA and considerable data and information on the local authorities' performance were analysed.

An aide memoire was developed to guide discussions and this was sent to officers prior to the meetings. However, it was stressed that this was for guidance only and officers were at liberty to discuss any issues specific to them. Thus whilst there is broad uniformity on the information gained, which provides an informed overview of the progress being made in the Region, the level of detail under certain headings varies between local authorities.

In addition to gaining information on the progress of individual local authorities in respect of 'Removing Barriers to Achievement', SEN Advisers were tasked to gain information about good practice which could be disseminated and also about barriers to progress. Brief descriptions of both are included in this overview, but further work is to be done to produce case studies of specific examples of good practice.

The information from these regional overviews will be used to prepare a national overview.

3. Purpose of report

- To inform the Government of progress in relation to the implementation of 'Removing Barriers To Achievement'
- To ensure a holistic and co-ordinated response to local authorities by informing the Field Force of progress and issues
- To inform the work of Regional SEN partnerships and facilitate co-ordination within and across regions
- To facilitate networking between LAs and regions
- To provide data and information to facilitate geographical benchmarking
- To identify, celebrate and disseminate good practice across LAs and regions
- To identify common issues / barriers to improvement within and across regions

4. Relevant background data

Numbers of Pupils (2004)	5-15 pupil no.	% of England
Region : West Midlands	741,907	11.40%
ENGLAND	6509873	100.00%

Free School Meals (2003)	% of Pupils Entitled
Region : West Midlands	17.6%
ENGLAND	16.0%

Percentage of Pupils with Statements (5-15)	Range 2003	Mean 2003	Mean 2002
Region: West Midlands	1.64 – 2.97	2.23	2.24
ENGLAND	0.72 - 3.11	2.15	2.16

(a) Nos of Statements Maintained by Regions	1999	2000	2001	2002	2003	2004
Region: West Midlands	27,970	27,730	30,260	31,060	32,170	32,640
ENGLAND	255,580	259,520	264,300	264,850	263,680	261,070

(b) Nos of Statements Maintained by Regions	Change	% Change
Region ; West Midlands	4,670	16.7%
ENGLAND	5,490	2.1%

New SSEN (%)	2003
Region: West Midlands	12.90
ENGLAND	12.13

% of children placed in special schools	Range 2003	Mean 2003 (%)	Mean 2002 (%)	Change (%)
Region: West Midlands	0.71 – 1.68	1.33	1.28	0.05
ENGLAND	0.19 - 2.37	1.22	1.16	0.06

ISB Special Schools	2002-3	2003-4		2004-5	
	£	£	% increase	£	% increase
Region: West Midlands	128,597,589	142,085,859	10.49	152,360,696	7.23
ENGLAND	1,006,661,837	1,086,665,854	8.24%	1,159,470,298	7.50%

Statements completed within 18 weeks (%)	Without exceptions			With exceptions		
	2001	2002	2003	2001	2002	2003
Region: West Midlands	70.10	86.50	89.00	40.30	50.20	54.40
ENGLAND	81.80	85.10	86.08	57.48	61.20	63.90

Exclusions	2000	2001	2002
Region : West Midlands	0.13	0.12	0.12
ENGLAND	0.11	0.12	0.12

SENDIST (numbers per 10,000 pop)	2000-2001	2001-2002	2002-2003
Region: West Midlands	1.87	3.05	3.37
ENGLAND	3.45	3.97	4.37

Cost per 5-15 population based on S52 for 2004-2005	ISB Special Schools	Notional SEN (table2)	Lines 1.2.1 & 1.2.2	Line 1.2.3	Line 1.2.6 (independent schools)
	£	£	£	£	£
Region: West Midlands	£205	£228	£60	£23	£40
ENGLAND	£178	£217	£43	£22	£68

S52 Notional SEN (table2)	2002-3	2003-4		2004-5	
	£	£	% increase	£	% increase
Region: West Midlands	127,142,020	148,652,193	16.92%	169,153,548	13.79%
ENGLAND	1,137,427,371	1,282,461,458	12.75%	1,410,412,530	9.98%

S52 - Lines 1.2.1 & 1.2.2	2002-3	2003-4		2004-5	
	£	£	% increase	£	% increase
Region: West Midlands	32,361,821	40,304,508	24.54%	44,270,389	9.84%
ENGLAND	268,907,524	307,480,572	13.92%	277,341,017	-9.80%

S52 - Line 1.2.3	2002-3	2003-4		2004-5	
	£	£	% increase	£	% increase
Region: West Midlands	14,218,762	14,096,747	-0.86%	17,209,864	22.06%
ENGLAND	92,133,381	111,676,669	21.21%	140,767,080	26.05%

S52 - Line 1.2.6 (independent schools)	2002-3	2003-4		2004-5	
	£	£	% increase	£	% increase
Region: West Midlands	21,368,902	28,077,992	31.04%	29,619,651	5.49%
ENGLAND	309,645,682	394,609,410	27.44%	441,178,305	12.44%

5. Removing Barriers to Achievement – Regional Overview

5.1 Strategic Planning

- High quality SEN/Inclusion Strategies, developed in partnership with local stakeholders, are seen by the majority of local authorities in the region as the key to moving forward with consensus. In many cases the SEN/Inclusion Strategy is underpinned by the Disability Access Strategy and linked to the wider community and corporate strategy for social inclusion and includes a local “vision for inclusion”
- All SEN/Inclusion Strategies in the region reflect the key elements within Removing Barriers to Achievement (RBA) or are being revised to do so. In many instances local authorities have carried out a detailed audit of policy and provision mapped against the four key elements of Removing Barriers to Achievement. In these circumstances RBA priorities form part of, or inform, the Education Development Plan, Post Ofsted Action Plan and Unit or Service Business Plans. In the majority of local authorities SEN/Inclusion Strategies are supported by detailed implementation plans with clear timescales and success criteria.
- All local authorities have signalled the intention to maintain a range of SEN provision including special schools and resourced mainstream schools in order to provide flexibility and choice for parents. Proposals for change have been addressed in different ways with varying degrees of success. There was also some frustration where consultation had taken place over a protracted period of time.
- A number of authorities are beginning to map local SEN/Inclusion Strategies against the wider Every Child Matters agenda. Progress in this area is greatest where local authorities are already operating within structures which reflect existing integrated Children’s Services. For some authorities thinking related to Every Child Matters is at the formative stage but acknowledged as an essential part of future strategic planning.
- All authorities in the region have formulated, or are trying to revise, their SEN/Inclusion Strategies in consultation with local stakeholders and with the support and involvement of Elected Members. In many cases the Strategy has been devised through a broadly representative stakeholder or steering group. On occasions such a group has taken a high profile role within the Council being chaired by the Leader of the Council or Lead Member for Education. Scrutiny Committees are viewed positively and seen to take a pro-active role in this area.
- The involvement of parents in policy formation varied widely in local authorities: some parents have been actively involved through Parent Forums whilst in others parents are represented through pressure

groups which are not always seen as widely representative of the local voice.

- The majority of local authorities within the region believe that SEN/Inclusion strategies are reflected within school improvement and school effectiveness planning, largely through the EDP. However, the degree of emphasis is variable.
- Whilst the majority of authorities believe that schools are broadly supportive of the principles of inclusion contained within local SEN/Inclusion Strategies, not all are confident about schools' practice in this area. In some cases local authorities believe that inclusion and school improvement are not seen as compatible and this was often reflected in discussions about league tables.
- Good practice examples:
 - SEN Commission with strong political leadership
 - Inclusion Steering Group or Working Group with focus groups linked to specific areas
 - Children's Trust providing the lead on joint working and integrated service/commissioning arrangements
- Issues/barriers:
 - Protracted periods of consultation concerning strategy which leads to inactivity
 - Challenging prevailing cultures and resulting outcomes
 - Consistency between the Five Year Strategy and every Child Matters

5.2 Meeting Statutory Requirements

- The majority of SEN/Inclusion Strategies across the region contain references to early years and the importance of early identification and effective intervention. In many local authorities specialist support for children at and below foundation stage is seen as essential, both in giving parents confidence that their child's needs are being addressed and that this could be achieved without reliance on statements of SEN.
- Many authorities have discrete pre-school forums in place to support children with special educational needs. Often these are part of EYDCP arrangements, linked to Children's Centres, resourced nurseries or Child Development Centres. In some cases pre-school panels are in existence both as a mechanism to consider requests for statutory assessment or as a means of co-ordinating support across

agencies.

- Very significant improvements have been made by a large number of local authorities in relation to the performance of SEN statutory functions. National data through BVPIs 43a and b reflect this progress. In some cases improvements have been from a very low baseline and reflected historically low investment in staffing and information technology to support this area. In others, local government reorganisation provided the impetus for an external review and where service improvements were required these had been linked to the commitment of additional resources.
- Where difficulties remained in meeting the 18 weeks timescale to proposed statement, these are either linked to delays in advice from health professionals or to staffing difficulties related to the Educational Psychology Service (recruitment or sickness). Many authorities had been pro-active in their work with PCTs to address delays in advice received as part of the statutory process or carried out service reviews to explore improvement options.
- Targeting attendance at annual reviews of statements is common to all authorities in the region. Attendance in these cases focused on transition reviews, out of authority placements (particularly in the non-maintained and independent sectors), pre-school children and reviews which might lead to a decision to cease to maintain a statement or allocate additional resources.
- Very few local authorities are working to models of common assessment, although the majority of them are anticipating the National Common Assessment Framework as the starting point for local discussions. Some authorities have established multi-agency groups to begin work on local arrangements, in part this is linked to initiatives such as IRT or reflected local decisions to bring together services within multi-disciplinary teams.
- Good practice examples:
 - Early Bird Pathfinder
 - Area SEN Panels, in some case chaired by Headteachers
 - Multi-agency Assessment and Moderation Panels
 - Monthly monitoring reports on BVPIs 43a/b to Education Management Teams
 - West Midlands Regional Partnership focus on benchmarking and statement writing
- Issues/ barriers:

- Appropriateness of BVPI43a/b within Corporate Performance Assessment
- The plethora of PCTs operating within some rural counties
- Ambiguities of start and end date for monitoring 18 week timescales
- Recruitment to Educational Psychology Services
- Resourcing replacement IT systems within local authorities

5.3 Special Schools

- Between them local authorities in the West Midlands region maintain and utilise a range of provision for pupils with statements of SEN. Planning for diversity of specialist provision is a key component of authorities' SEN/Inclusion strategies as is the desire to develop new provision within a local community context or at a regional or sub-regional level.
- In total the region maintains 131 special schools supporting over 12,000 pupils. In addition there are 3 non-maintained special schools with 170 pupils and 51 Pupil Referral Units supporting over 1300 pupils. The greatest pupil percentage increase by far over the last twelve months is within the latter provision, with numbers in Pupil Referral Units increasing by over 12%. Reasons for the growth in numbers within Pupil Referral Units are complex: in part this reflects the requirement for full time education of excluded pupils, including those with SEN. Additionally the increasing use of PRUs as provision for statemented pupils awaiting specialist placements is a contributory factor.
- Six of the region's local authorities had been altered as part of local government re-organisation in the late 1990's and as a consequence have undertaken reviews of their inheritance of special school provision. Of the remaining eight, local authorities' plans for change and development of all SEN provision are already at implementation stage or about to be completed. In many cases changes to the pattern of special schooling has been progressed well having gained local consensus as part of widespread consultation and strong political leadership. In a small number of authorities lengthy consultation had resulted in revised proposals which reflected local feedback yet consistently failed to gain the confidence of some parents and schools.
- Within the region special schools continue to be seen as an important component of a flexible range of specialist provision at local level. They are well supported by parents and have their confidence. Where changes to special schools are being proposed by authorities these largely focus on the development of fewer broadly based generic

schools organised to provide a more equitable pattern of geographically based provision. Linked to this strategic intent are improved strategies to increase the capacity of mainstream schools to meet a wider range of special educational needs.

- As a region there is a wide diversity of special schools with many enthusiastic special school Headteachers providing outreach services to mainstream schools and leading the way in developing innovative approaches to inclusion. A number of local authority strategies for the transformation of this sector include plans for the co-location of special schools with primary or secondary schools or as part of a broader “learning campus”. In many cases proposals have been inextricably linked to local authority capital strategies with transformation potentially resourced through Building Schools for the Future (BSF) funding to supplement Targeted Capital Funding (TCF) or funding raised through capital receipts. The poor inheritance of building stock and lengthy timescale over which BSF funding will be released was seen by many authorities as a barrier to inclusion.
- Specialist support for pupils with low incidence special educational needs is widely available across the region, as is provision for pupils with physical disabilities and those having moderate, severe or profound learning difficulties. The majority of authorities in the region report pressure on places for high functioning or severely autistic pupils together with provision for pupils with severe behaviour, social and emotional difficulties. Despite the opening of new BESD special schools, the development of peripatetic autistic services, joint working between education, social care and health sectors and impressive work at a regional level through the West Midlands Regional Partnership, these two categories of SEN form the largest percentage of pupils placed in high cost out of authority provision. An additional concern overall is the paucity of provision for girls with severe and challenging behaviour.
- Good practice:
 - A Federated arrangement of three BESD schools within an authority
 - Special schools developed as Key Learning Centres or Centres for Additional Learning Needs
 - A regional centre for autism providing on site provision and outreach services to schools
 - The formation of Special School Inclusion Teams working with mainstream schools through commissioning arrangements
 - Sub-regional co-operation on SEN Post 16 provision working with the LSC
- Barriers/issues

- Increasing complexity and severity of pupil needs
- Capital implications of transforming special schools
- Providing co-ordinated education, care and health arrangements for pupils with severe and challenging behaviour
- Availability of therapies together with Child and Adolescent Mental Health services
- The role of Pupil Referral Units for pupils with complex special educational needs

5.4 Improving advice and support for schools

- There is a range of practice in the way school improvement/ effectiveness services and SEN/access services work together within local authorities to provide support and challenge to schools. In a number of authorities the management of both functions under a single Assistant Director provides the strategic lead for co-ordinated approaches. Equally effective strategies can also be seen through Area Networks, or Area or School Focused Teams with a clear focus on pupil progress. In a small number of local authorities, teams within school improvement and SEN/access operate separately. Where this is the case officers believed that the focus on pupil achievement and special educational needs are likely to be wrongly viewed by schools as discrete entities.
- Wave 3 of the Primary National Strategies was referred to by a number of authorities as a good example of co-ordinated working across school improvement and SEN/access services.
- Many authorities had reviewed their services in order to target support on whole school capacity building, moving away from work with individual pupils unless there was a need for very specialist intervention. Some authorities offered very extensive centrally organised CPD programmes which were either wholly or partially traded. Different access arrangements for CPD, either through service trading or as a core entitlement to schools was a feature of some authorities and often reflected the organisation of services into Business Units.
- Most local authorities in the region reported excellent or good SENCO networks. Area SENCOs and Early Years Teams, supporting an increasingly wide range of maintained, non-maintained and private sector nursery provision, were felt to be particularly effective.
- All authorities within the region maintain or have access to specialist support teams for pupils with low incidence needs (differently defined)

which are often a mixture of traded services and core entitlement. Where authorities were moving towards maximum delegation of resources for SEN and services operated on a wholly or partially traded basis, service buy back was reported as good. An exception to this was in the area of behaviour support where poor uptake had led to the disbandment of the service with a resultant gap in service provision.

- Authorities reported a mixed picture of therapy availability. In a small number of cases Health Services were able to meet local needs, for example in speech therapy provision, and no extra costs were incurred by the local authority. This was not the general experience however, with one local authority reporting expenditure on therapy support in excess of £0.4m annually across eight PCTs.
- Good practice examples:
 - University accredited CPD programme for Teaching Assistants
 - Leadership for inclusion – CPD for Headteachers
 - Multi-disciplinary Area Teams
 - Early Years working “Success for Under Fives”
 - Quality Standards for Sensory impaired Service
 - Inter-authority Service Level Agreements
- Issues / barriers:
 - Recruitment to specialist services
 - Moving a way from a culture of dependency to one of targeted or traded support
 - Health service priorities for children’s services
 - Provision gaps where services cease to exist as a result of trading

5.5 Funding to support early intervention and inclusive practice

- Over two thirds of authorities in the region have made significant progress in developing a new funding methodology to break the link between resources and statements of SEN. The remaining authorities are in the process of review and recognise the need to accelerate progress: some are experiencing reluctance on the part of schools to make the significant changes that, for example, external inspection had recommended.
- Where formula reviews have taken place changes had been carefully planned, discussed within the local Funding Forum and based on

extensive consultation with schools. Funding methodologies vary from authority to authority, with a range of approaches, including the use of funding matrices, banding and audit. Most authorities had delegated resources on an incremental basis and some, although not all, are using predictive spreadsheets and rigorous monitoring to ascertain impact. Whilst maximum delegation is the aim for many, a few authorities continue to hold back a small central reserve to use on a contingency basis.

- Documentation setting out the responsibilities of schools' and local authorities for SEN is widely available in hard copy and electronic form. In many cases the documentation which covers policy, procedures, guidelines and protocols is of very high quality and has been systematically reviewed to reflect revisions to the Code of Practice. Guidance for statutory assessment is widely available and extensively used in decision making.
- Assessment and Moderation Panels are widely in place .Some authorities separate these for early years and children of statutory school age .Area Panels, which have a role in allocating resources to statements or resourcing schools to support early intervention, are a growing feature of the region
- All authorities stated intent to make funding for SEN more transparent although in some cases the complexity of formulae militated against this.
- As a region, data places the West Midlands as having the highest increase in statements over a five year period. However, this masks significant variation between authorities. Using 1999 as the base, the majority of authorities have seen an upward trend in statements, but since 2003 are beginning to see a downward trajectory. Four local authorities have numbers of statements continuing to rise. Recent adjustments to funding formulae or policy direction have yet to demonstrate impact.
- Good practice examples:
 - Area panels with resources to allocate to schools
 - EP follow-up to parental referral for statutory assessment
 - Allocations of funding to federations of schools
 - Early Years Inclusion teams linked to Children's Centres
- Issues / barriers:
 - Schools' confidence in maximum delegation in view of central overspends on SEN budgets

- Monitoring schools' use of delegated resources
- Giving parents and schools the confidence to reduce reliance on statements
- Understanding complex formulae

5.6 Developing approaches towards monitoring and accountability

- The extent to which authorities have rigorous systems for monitoring the performance of individual pupils with SEN, whole school provision for SEN and SEN budgetary expenditure, varies widely across the region. In some authorities monitoring is well developed, is part of a strategy approved by Elected Members and forms an integral part of local authority supported school self – review processes. In other authorities there is a recognised need for further development in this area, particularly in monitoring schools' use of delegated funding for SEN. Not all schools are supportive of this practice
- A number of authorities have developed Quality Standards for SEN/Inclusion with associated kite marks to recognise good practice. Other authorities are developing approaches to monitoring through SEN Audits with School Improvement Advisers targeting the performance of the lowest achieving quartile of pupils as part of their ongoing support and challenge role with schools.
- From January 2003, schools were asked to identify in their annual returns pupils at different levels of SEN. This information is being used by some authorities as the means of focusing on pupil progress for a number of vulnerable groups.
- Good practice examples:
 - The appointment of monitoring and review officers
 - Schools Self-Evaluation Framework
 - Inclusion Chartermark with external accreditation
 - SEN Monitoring Profile on CD ROM distributed annually to schools
- Issues / barriers:
 - Demonstrating the link between expenditure and pupil outcomes
 - Membership of Schools' Performance Group and the extent to which SEN/Inclusion practice fits into the school categorisation process

5.6 Out-of-authority placements in Independent / Non-Maintained Schools

- The majority of local authorities expressed concerns in this area, largely related to the very high costs for a small number of pupils .Over half the authorities in the region report some increases in numbers placed in the non-maintained and independent sector between 2003 and 04. There is no single reason for this, rather a variety of factors which include, SENDIST directions, low levels of respite and residential provision locally, complex and severe needs which put a strain on existing resources together with identified gaps in provision. The work of the West Midlands Regional Partnership currently has this as an area of focus.
- A small number of authorities have made very good progress in reducing reliance on Independent/Non-maintained placements. Jointly agreed protocols are in place and multi-agency co-operation at local level has contributed to the development of new provision locally.
- Over half of all local authorities report this as an area of budgetary pressure. Even where numbers of pupils are reducing the percentage increase in the cost of placements is making budget management difficult. All local authorities have some form of joint decision - making forum in place for bi-partite or tri-partite funded placements, although not all operate pooled budgets. In some cases decisions are made through a single complex case panel; in others through Area based or “solutions “based panels. In the main co-operation between education and social care services is reported as good, although there are exceptions related to service thresholds. Health contributions to funding is the area of most contention
- Good practice examples:
 - Appointment of jointly funded commissioning officer
 - Sub- regional planning forum
 - Tri-partite Panels
 - Jointly funded Key Teams
 - Pro-active working through the Regional Partnership
- Issues / barriers:
 - Thresholds for budgetary and service contributions by partner agencies
 - Health service contributions to funding

- Decisions by SENDIST which are inconsistent with council policies
- Local pressure groups advocating residential placements

5.8 Use of information / data

- A growing number of authorities now make use of benchmarking data and benchmarking reports provided through the West Midlands Regional Partnership. The provision of good quality data to schools for their use in self evaluation is a developing area within the region. A range of data is integrated into local authority data sets including P scales, Fischer Family Trust and PAT. A few authorities who provided data to schools through School Performance Profiles report variable use of the data.
- P scales are reported as being widely used in special schools with some special schools leading training in this area across the authority. The use of P scales with mainstream schools is variable, with most authorities wishing to accelerate progress.
- Good practice examples:
 - Availability of CD ROM to schools with benchmarking data and comparative information
 - Target setting with schools based on vulnerable groups
 - Monthly reporting to Education Management Team of key SEN performance indicators
 - Local authority published performance indicators for inclusion
- Issues / barriers:
 - High pupil mobility
 - Availability of central staffing to support data collection and monitoring
 - the maintenance of different databases across local authorities with data gathered at different points

5.9 Building the confidence of parents

- All authorities in the West Midlands region have Parent Partnership Services (PPS) which the majority judge to be highly effective. The functions of each PPS are variable: some services focus very specifically on supporting parents through the statutory assessment process whilst others have a much broader role with parents and

schools. In the latter case services provide a vehicle for ensuring that the voice of the parent feeds through into council policy making and review.

- There is no consistent regional pattern of management arrangements for Parent Partnership Services. Some services are directly managed within the education department or wider council; other services are outsourced or managed through a Service Level arrangement with the Voluntary Sector.
- Over half the authorities in the region make use of the West Midlands Mediation Service and this is generally found to be effective in reducing the number of appeals that progress to the Special Educational Needs and Disability Tribunal (SENDIST). Authorities that make limited or no use of the regional mediation facility cite very effective local arrangements, for example, intensive casework support from SEN Officers or Befriender Support Workers, usually promoted through the Parent Partnership Service.
- There is a variable pattern of appeals to SENDIST across the region with almost equal numbers of authorities showing increases or decreases. Overall the regional trend for the registration of appeals is rising. In order to keep appeals to a minimum, reducing the stress to parents and the time demands on LEA officers, a number of authorities have increased staffing in SEN Assessment Teams or appointed dedicated officers to this area. There is some concern generally that SENDIST does not take account of authorities' policies linking funding to early intervention and prevention to reduce reliance on statements. There is additional concern at the high cost of some SENDIST decisions which have very significant impact on SEN expenditure.
- Good Practice examples:
 - Parents Reference Groups which act as a mechanism for consultation on a wide range of policy related issues
 - Parents Forum with associated Annual Parents Conference
 - Parents Strategy Group which is a sub-group of the Children's and Young Persons Strategic Partnership
 - Befriender Support Workers which are recruited and trained through the Parent Partnership Service
 - Accredited CPD for parental supporters with website and training materials promoted through the Parent Partnership Service
- Issues / barriers:
 - The active involvement of local pressure groups which encourage appeals to SENDIST

- The involvement of solicitors in appeals to SENDIST and the extent to which this causes expense to parents and excessive time in appeals preparation and attendance by LEA officers
- Decisions of SENDIST which are at odds with local SEN and Inclusion policies