

# Autistic UK (Cymru)

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SENT VIA EMAIL - [Kirsty.Williams@senedd.wales](mailto:Kirsty.Williams@senedd.wales)

15<sup>th</sup> June 2020

Dear Ms Williams MS,

Several families have expressed concern regarding your announcement regarding pupils returning to school from 29<sup>th</sup> June 2020. We have been asked whether there was any specific information pertaining to the inclusion of children with Additional Learning Needs and/or Disabilities (ALN/D), and our review of the numerous documents written by Welsh Government have not provided satisfactory information for children who have support needs but attend mainstream schools.

## Why we are writing

Your document titled *School opening times and services: coronavirus*<sup>[1]</sup> provides some guidance for SEN schools, but does not address the support needs of pupils with Statements of Special Educational Needs, Funded Healthcare Plans, or who have IEPs under School Action/School Action Plus. In addition, *The decision framework for the next phase of education and childcare: considerations, planning and challenges*<sup>[2]</sup> references “vulnerable” learners, but provides no definition as to who would meet that criteria.

It is our understanding that Welsh Government used the information from the document titled *Technical Advisory Cell: Our latest understanding of COVID-19 with respect to children and education*<sup>[3]</sup> to inform their decision making process and the production of policies and working documents in the implementation of pupils returning to school. This document states that “those with SEND (special educational needs and disability) are very likely be adversely affected [by the school closures]” (p. 9), yet due to the uncertainty regarding whether they will have access to the support they need – including support set out in Statements and/or Funded Healthcare Plans – they are the pupils most likely to be unable to access school



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during this time. Furthermore, the statement from page 10 that “previously available formal and informal support has decreased as a result of the coronavirus outbreak” is supported by reports we’re receiving from our stakeholders, and the lack of information regarding the support their child(ren) will receive in school is adding to their growing concerns that children with ALN/D are not being fully considered in matters which have arisen since the COVID-19 pandemic.

While the Welsh Government document titled *Keep Education Safe: Operational guidance for schools and settings (COVID-19)*<sup>[4]</sup> mentions staff use of PPE when they assist pupils with intimate care needs, and provides a relatively detailed list of support available for children with mental health difficulties, all references to children with ALN/D pertain to those in Special Schools, and not to those in mainstream. The document states that “Special school staff should consult parents and carers about specific support needs, and use their discretion flexibly in agreeing the way forward for specific learners. This should be based on a clear risk assessment, recognising it may be more appropriate for some learners to continue learning remotely.” While it could be inferred that this information is to be adopted by mainstream settings for their pupils with ALN/Ds, in practice this means that schools are having to interpret the information given and make their own decisions. This means that some schools are announcing that 1:1 teaching assistants (TAs) must remain 2 meters away from pupils at all times, while others are informing parents that TAs can give close contact support but will have to wear PPE.

The guidance continues by stating that “Risk assessments should already exist for learners with more complex needs, including those with emotional and behavioural needs. These risk assessments will require to be updated as a matter of priority in light of changes to provision such as environment and staffing, while also remaining mindful of the additional distress learners may be experiencing due to COVID-19. If risk assessments are not in place, then they must be undertaken in accordance with this guidance and local risk assessment guidance.” As the more in-depth guidance states that it relates to Special Schools, it appears that this advice is also being interpreted differently depending on the school setting. There is no joined-up approach which means that some children will be unable to access in-school education, which differs from families who are *choosing* not to send their child back to school until September. Considering the evidence that support systems, both formal and informal, have been removed from these children due to the pandemic, what additional support will be in place for them to remote learn when everyone else is allowed back? There is no specific guidance relating to children with ALN/Ds in the document *Schools increasing operations from 29 June: coronavirus*<sup>[5]</sup>, or in any press releases provided by Welsh Government<sup>[6 & 7]</sup>.

Your guidance titled *Keep Education Safe: guidance on learning over the summer term*<sup>[8]</sup> advises that “Practitioners will need to have particular regard for learners who, for whatever reason are unable to attend a school or setting to receive any contact time and how they can be supported remotely,” Yet this isn’t set out in guidance. It is unreasonable to expect all schools to be able (or willing) to provide the

same level of support and care during these times, which puts children with ALN/Ds at an increased disadvantage to their peers. The document goes on to state that "Returning to school itself may well cause anxiety and some learners, especially younger or the more vulnerable will find the disruption of partial return difficult to manage. Practitioners should appreciate that many, if not all learners may find challenges in this and some learners will find this especially difficult to adjust to." However, with the lack of guidance regarding how to support children with ALN/Ds outside of Special Schools, schools are not going to be in a position to protect the wellbeing of the children who are struggling with the 'new normal'.

The same document informs readers that schools are to assess pupils in order to "support each individual learner as they re-engage with learning, to encourage progression in learning and to build their confidence in what will continue to be an unfamiliar context... [and] to identify what they have achieved and what next steps they should take both to enable them to be ready to learn and to continue to make progress in their learning." How will pupils who cannot access school be assessed? It is concerning that this approach could make the attainment and wellbeing gap larger.

This issue is made more concerning as the guidance states that "the blend of 'in school' and 'out of school' learning should be supported by a single curriculum, driven by the learning undertaken during the time spent 'in school'" and that "It is critical that learners should not experience two parallel curriculums which would lead to a confusing and disjointed learning experience." How can this be achieved when learning from home is out of the 'control' of staff? What consideration has been made for children with 1:1 support needs? Many families have more than one child with ALN/Ds, and ensuring each child is fully accessing the curriculum from home, with little practical support from schools, is putting undue strain on familial relationships and causing high levels of stress and anxiety for pupils and parents alike. The document does admit that "Additional support will be required for many, such as children who are experiencing grief, children with special educational needs or other barriers to learning and children with existing mental health problems," but does not make any suggestions as to how schools can practically provide that support.

In addition, it was concerning to read in the *Written Statement: Publication of guidance to support educational settings increase capacity*<sup>[9]</sup> that "the vast majority of pupils described as 'vulnerable' have not been attending." Our stakeholders report that many parents were not given the option to send their child[ren] into school as hubs struggled to provide spaces for the child[ren] of key workers. While most are in agreement that key workers needed to be given priority, we feel that the Welsh Government statement is disingenuous, particularly as there has been no definitive advice as to which pupils are considered 'vulnerable' and no reports have stated that children who attend mainstream settings who have ALN/Ds have been able to attend school.

### **What this means for our stakeholders**

There is going to be an unfair split of support for Autistic children, who are likely to be far more unsettled than most other children returning to school. That interpretation of how to cater for children with ALN/Ds is down to each school means that those pupils who attend schools with an ethos of full inclusion and who embrace difference are going to be at an advantage compared to those who are not.

Furthermore, it is unfair that those children who are unable to go back to school – either because the school environment is prohibitive, or not having access to the support set out in their Statements or IDPs, or those who have medical conditions which prevent them from returning – are classed as ‘choosing’ not to return. While they will not be penalised financially, nor will they receive a letter from the attendance officer, they are (in essence) being forced out of school in a way that their peers are not. What extra support is going to be put into place for those families during this time? These children are often the most ‘vulnerable’ children, yet the concern is that they will become the ‘invisible’ and ‘forgotten’ children.

Welsh Government also need to consider that many Autistic children have Autistic – or otherwise neurodivergent – parents. The lack of straightforward information in one concise document is a concern, as is the lack of the provision of Easy Read information. The guidance and policies for this ‘new normal’ have been written with two main types of pupil in mind: mainstream children with no or low support needs, and children whose needs fall into PMLD categories who attend Special Schools. Many Autistic children fall outside these categories, and their parents – whether they are Autistic or not – require firm and clear information as to how their children are going to be supported long-term.

**Therefore, we ask for clarification on the following:**

- What support will be provided in school for children with Statements of Special Educational Needs and/or Funded Healthcare Plans who do not attend Special Schools
- What support will be provided in school for children who are on School Action or School Action Plus whose support needs have increased as a direct result of the coronavirus pandemic?
- What support will be provided to families whose children with Statements of Special Educational Needs and/or Funded Healthcare Plans whose children are unable to return to school? This should include information regarding digital/online learning and what happens if that is inaccessible.
- Can you change your guidance to reflect that the existing (and new) support needs to children at all stages of the Graduated Response are to be supported in all schools, including the removal of the 2 meter rule for TAs if that applies?
- Can all future press releases and statements signpost parent/carers to where they can obtain information pertaining to current guidance given to (all) schools for supporting children with ALN/Ds?

- Will you explicitly inform school leaders to adopt the guidance aimed at Special Schools for their pupils, or will you write new guidance pertaining to pupils with ALN/Ds in mainstream schools?
- How will schools assess the educational needs of pupils with ALN/Ds who are unable to return to school?
- Are you writing a support guide and/or framework for schools to assist them in providing wellbeing support to children with ALN/Ds for all pupils, including those who do not attend Special Schools?
- Is there an agreed definition of what makes a pupil 'vulnerable'?
- How were parents whose children are classed as 'vulnerable' invited to send their children into school during lockdown?
- How will children with ALN/Ds be supported long-term?
- How will schools/Local Authorities support families who have both children and parents with ALN/Ds?
- Can future information be condensed into a single concise document, preferably with an Easy Read option?

We understand that the coronavirus pandemic is beyond anything experienced in our lifetimes. There is an extraordinary amount of work to be completed as a result, however the Autistic community – and the wider Disabled community – as a whole feel that their needs and circumstances have not been considered when policies and guidance documents have been written. This apparent lack of consideration for Autistic (and otherwise ALN/D) pupils has been seen as 'evidence' that our needs are not accounted for until a specific request has been made.

Autistic and non-Autistic parents of Autistic children have expressed concerns about sending their children back to school, and the lack of guidance has increased their worry. In turn, this could mean that Autistic children are underrepresented in the cohort of returning pupils, which not only means they will be socially, emotionally, and academically disadvantaged, their parents (particularly those who are Autistic themselves) remain their children's sole educators with little or no practical support. We hope that you will consider the issues raised in this letter, and can provide information as to how these can be resolved before children start returning to school on 29<sup>th</sup> June 2020.

Yours sincerely,

*Willow Holloway*

**Willow Holloway**  
**Chair of Directors**  
**Autistic UK**

*Kat Williams*

**Kat Williams**  
**Director**  
**Autistic UK**

## References

- [1] <https://gov.wales/how-schools-will-work-during-coronavirus-pandemic>
- [2] [https://gov.wales/sites/default/files/publications/2020-05/decision-framework-next-phase-education-childcare\\_0.pdf](https://gov.wales/sites/default/files/publications/2020-05/decision-framework-next-phase-education-childcare_0.pdf)
- [3] <https://gov.wales/sites/default/files/publications/2020-06/our-latest-understanding-of-covid-19-%20respect-to-children-education.pdf>
- [4] <https://gov.wales/keep-education-safe-operational-guidance-schools-and-settings-covid-19>
- [5] <https://gov.wales/schools-increasing-operations-29-june-coronavirus>
- [6] <https://gov.wales/guidance-published-help-schools-colleges-and-childcare-settings>
- [7] <https://gov.wales/check-catch-prepare-summer-and-september-all-schools-wales-enter-next-phase>
- [8] <https://gov.wales/keep-education-safe-guidance-learning-over-summer-term>
- [9] <https://gov.wales/written-statement-publication-guidance-support-educational-settings-increase-capacity>