



Feedback for OAP Consultation

Comment:

- *The layout of the document by area of need is clear, so is a useful point of reference for schools. I am concerned, generally, however, that schools are being asked to do more and more with less which is not sustainable and will lead to teachers (and other staff) leaving the profession.*

Response:

The OAP Guidance serves as a supportive framework designed to facilitate the implementation of the Graduated Approach for early identification and addressing of needs. It aligns with the goals outlined in the Hillingdon SEND and AP Strategy. Schools and settings can utilise this guidance to identify and establish provisions for children and young people (CYP) with additional needs. It is not a tick list, and there is no expectation for settings to do more than what is outlined. We anticipate that schools will reflect the elements they are implementing from this guidance in their SEND information reports and in requests for additional support or EHC assessments.

The OAP Guidance is based on evidence-based best practices. As we discover further best practices, we will update the guidance to help educational settings identify and consider other approaches they might want to implement.

Comments:

- *It would be really helpful for schools to see a costed-out version of this document so that all parties can have visibility of schools' ability to provide the necessary OAP within the allocated budgets. A case study approach may be helpful here.*
- *When read alongside the new band funded model, it is hard to see how schools with a disproportionate number of children with EHCPs can continue to survive without going into deficit. For example, £186,000 of my budget is already taken up with the first £6,000 of support for mainstream EHCPs before we even start to look at the other 96 children on SEN support.*
- *Where is the costing exercise that sits behind this document (staff/training/time)? We need some transparency to show that the levels of support in this document are achievable for the 'up to £6,000' for each child on the SEN register (bearing in mind that the DfE notional guidance suggests an average of £3,000 for each SEN support child).*

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- *Budgets are so tight. Although schools are expected to budget for notional funding – this does not cover the cost to schools. For example, setting aside £6k for every pupil who is on the SEND register who requires support and intervention equates to 16% of my entire budget (inc. element 2 of EHCP funding formula). I know that not all pupils on the register*

will need that amount to access SEN Support or SEN Support + but some will need more than £6k to ensure they can safely access a mainstream environment so it averages out. This money is used to enable my staff to be trained, released to deliver programmes/interventions, meet with external professionals/therapists as well as fully resourcing every intervention. This is a significant proportion of my school budget and is very difficult to sustain.

- *Funding technology is difficult in schools*
- *The cost of replenishing consumables, such as chew toys is not sustainable.*
- *Suggested training programmes are expensive*

Area of Need: Social Communication – pages 10 - 17

Area of Need: Speech, Language and Communication (SLCN) – pages 47- 53

- *Much of the guidance here assumes all schools have access to a link Speech and Language Therapist – this is not always the case. What happens for these schools?*
- *Who funds the SALT at SEN Support/SEN Support +?*

Response:

The OAP Guidance is intended as a resource of effective practice for schools to draw from. Schools will do this in a variety of ways depending on their context and the needs of pupil cohorts. Guidance on the SEND Notional Budget has been developed and was circulated to schools in September 2024

[\[Withdrawn\] High needs funding: 2023 to 2024 operational guide - GOV.UK](#)

The new Hillingdon Banded Model framework for mainstream schools has been coproduced with schools, parents/carers and other professionals (i.e. therapists) to ensure that it references and supports the ‘graduated approach’ outlined in the SEND Code of Practice (2015), and the 4 areas of need referenced in this. The descriptors provide clear detailed profile of student’s needs and provision to meet these needs hence the provision maps should not be costed out any more as each band is relevant to the profile of the student within descriptors. This provides consistency with the OAP Guidance which provides guidance on support and intervention that should be used prior to considering a request for an Education, health and Care Needs Assessment.

.Currently Hillingdon provides targeted funding to supplement the notional SEN budget for schools that have over 3.5% of pupils with EHCP on their roll (excluding those in SRPs and DUs). This is set out in Hillingdon’s SEND Funding Framework Guidance for Mainstream Schools and Academies 2024 [Statutory funding \(EHCPs\) - Hillingdon Council](#)

For funding technology in schools for pupils with SEND please refer to [High needs funding: 2024 to 2025 operational guide - GOV.UK](#)

We are working with commissioners to review the contract for Children Intergrated Therapy Service (CITS) which is jointly commissioned by NHS and the LA. CITS provides support not only for pupils with an EHCP but also at pre-statutory level for CYP on SEN Support who require therapeutic input. Therefore, each educational setting can liaise with their link therapist when required without any additional costs.

Comment:

- *Assumptions seem to have been made in this document that schools have the staff available to offer specialist interventions*
- *Lots of the interventions listed require specialist training and should be delivered by qualified professionals*

Response:

Training offer is shared frequently with schools by LA specialists (EPS, SAS) and Health colleagues (CITS, CAMHS). Full details can be access on LEAP, for individual staff, and whole school. [Training and support for professionals - Hillingdon Council](#)

The OAP Guidance is designed to assist most children and does not require delivery by a specialist. Schools are responsible for ensuring staff receive adequate training to provide Quality First Teaching and meet the diverse needs of their pupils, ensuring the best outcomes for all children. When necessary, interventions may be planned to support development, ideally in small groups to encourage socialisation and reduce reliance on 1:1 approaches.

Comment:

Area of Need: Social Communication – pages 10 - 17

- *Mention of intensive interaction and a ‘highly differentiated curriculum’, this means someone has to be available to plan this and support the child to access it – this reads as above OAP, therefore in need of funding above SEN support+*

Language and Communication:

- *Much of what is listed in SEN + for this area of need requires high levels of support and/or time to prepare resources.*
- *Once we are talking ‘highly differentiated curriculum’, this means someone has to be available to plan this and support the child to access it.*

‘A consistent approach to managing individuals with “reasonable adjustments” made’ – what does this mean? OAP is all about reasonable adjustment, so this is a higher expectation than what is ordinarily available

Response:

In each school there is a designated professional SENCO who plans and organises support for CYP with SEND, for teaching staff to implement. Through adaptive teaching/ differentiation it is required from every school to ensure reasonable adjustments are in place for individual students who need them. There are some great examples from different types of schools (nurseries, primary schools, secondary schools of implementing OAP. Please see some case studies here [Case Study.pptx](#)

SEND Banding Review Working Group has developed some definitions, which are incorporated in the OAP document so that there is a consistent approach across all Hillingdon settings.

Please refer to reviewed Banding Funding Guidance for Mainstream Schools [Statutory funding \(EHCPs\) - Hillingdon Council](#)

Adaptive Teaching / Differentiation

'Adaptive Teaching / Differentiated'	For high, middle, low ability sets
Use of 'highly adaptive teaching' / 'highly differentiated'	Use of 'Highly adaptive teaching' / highly differentiated for a small group of up to 6 children and young people
'Individually adapted teaching' / 'individually differentiated'	'Individually adapted teaching' / 'individually differentiated' to meet the needs of an individual child / young person

Comment:

"intensive interaction approach??" means different level of support depending on CYP age.

Area of Need: Executive Functioning/ Working Memory – pages 18 - 24

- *'Individualised, effective one to one support' in SEN Support+ – again, this reads as above OAP, therefore in need of funding above SEN support+*

Staffing:

- *Much of this document assumes that all schools have the staffing to be able offer specialist interventions.*
- *Are the LA expecting schools to 'piggy back' support, i.e. an LSA who is funded through an EHCP, taking on children who are SEN Support/SEN Support +? What if the pupil they are supporting is not at the stage to access this SEN Support-level intervention but is not safe to be left without support?*

SEN Support +

- *'Individualised, effective one to one support' – this is NOT ordinarily available – this requires banded funding*
- *Access to available adults is not always a possibility.*
- *Lots of specialist intervention should be delivered by qualified professionals who have studied it for 3 years, not a TA who has had a day's training*

Dependant what the need is. Follow and implement other professionals' advice.

- *Not practical to train only one member of staff in interventions – absence and staff retention means that more than one member of staff should be trained in all interventions but this has huge cost implications for schools.*

Response:

Intensive interaction strategies are part of OAP in many Local authorities as it is person- centred communication approach that directly promotes social inclusion and communication regardless of CYP age. Intensive Interaction is a responsive approach to communication that values each individual's uniqueness with practitioners and families consciously adjusting their communication style to facilitate mutual connection.

The approach focuses on using the 'Fundamentals of Communication' as a means of establishing and developing improved social communication exchanges.

The Fundamentals of Communication (FoCs) are those communication skills and understandings that, in developmental terms, normally precede symbolic speech development: although Intensive Interaction is now also being used with people who already have some level of speech and language comprehension.

These Fundamentals of Communication are the social communication capabilities of:

- developing the ability to attend to another person
- using and understanding eye contacts and facial expressions
- learning to share personal space
- using and understanding sociable physical contacts
- using vocalisations with meaning (for some, speech development)
- taking turns in exchanges of behaviour, and/or sequencing a social exchange with another person
- enjoying being with another person

The OAP guidance provides links to training opportunities around intensive interaction strategies.

We have reviewed the wording and amended to:

- *'Individualised, effective additional adult support.*

To provide further clarity on individualised support ...

Some children and young people will need additional adult support in the classroom to help them to make good progress. This may be through targeted group work (see definitions on sizes of groups in Section 2), access to adult support when needed (an adult is observing and able to step in and support when needed), or individual support for a specific activity. This may include support for specific programmes, or a child / young person may require access to more adult support for some, most or all of their school day. Where this is the case, this adult support must form part of the expectation of high-quality teaching as well as the wider implementation of the child / young person's EHCP.

It should not be expected that **all** provision is delivered via 1:1 support, or that provision delivered by a suitably trained and experienced teaching / learning support assistant replaces high-quality teaching.

Wherever provision is delivered on a 1:1 basis, this should be kept under review, including with the child / young person. The child / young person's progress must be balanced against dependency on adult support to complete a task. It is important that children / young people are supported to be as independent with their learning and development as they can be, and that change in how that support is delivered is managed in a planned way to support their progress and confidence.

Within the Quality First Teaching approach for pupils with SEND in mainstream settings, teachers should develop a repertoire of various strategies they can use flexibly in response to individual needs and use them as the starting point for classroom teaching for all pupils, including those with SEND. These are:

- Scaffolding – Scaffolding offers temporary supports, such as a writing frame, that is gradually removed as the pupil becomes increasingly independent. Scaffolding is commonly considered part of guided practice in explicit instruction. Scaffolding can also be used to reinforce consistent expectations for behaviour - for example, what equipment is needed for each lesson and classroom routines within the school day.
- Explicit instruction- Explicit instruction refers to a range of “teacher-led” approaches, focused on teacher demonstration followed by guided practice and independent practice. Explicit instruction is not just “teaching by telling” or “transmission teaching”. It usually begins with detailed teacher explanations, followed by extensive practice, later moving on to independent work.
- Technology- Technology can assist teacher modelling. For example, a teacher may use a visualiser to model worked examples in English. To increase pupils' practice, technology applications, such as online quizzes can prove effective. Speech generating apps to enable note-taking and extended writing can be helpful. Technology, as a method to provide feedback to pupils and/or parents can be effective, especially when the pupil can act on this feedback.
- Cognitive & Metacognitive strategies: chunking- Cognitive strategies are skills like memorisation techniques or subject specific strategies like methods to solve problems in maths. Metacognitive strategies help pupils plan, monitor and evaluate their learning. Chunking the task at each stage will support pupils with SEND - this may be through provision of checklists or providing one question at a time to make the information easier to process.
- Flexible grouping- Flexible grouping describes an in-class approach that sees groups formed with an explicit purpose. They focus on a specific learning need and are purposely disbanded when the purpose is met. Allocating temporary groups can allow teachers to set up opportunities for collaborative learning, for example to read and analyse source texts or complete graphic organisers.

There is a training offer for New SENCOs who can then cascade learning and resources to other teachers and new teaching assistants. The Hillingdon SEND training offer has been recently reviewed to reflect all the recent feedback from school professionals.

Consistent participation in training offer will:

- Support Staff Structure: Each school will have its own unique structure for support staff and training can be embedded as part of business as usual to maintain quality of teaching across the setting.
- Provide CPD for SEND: Continuous Professional Development (CPD) for staff related to SEND with training shared across the team.
- Strengthen Leadership and Performance: Leadership in SEND, including performance targets for school staff is key to ensure good teaching practice.
- Provide Shadowing Opportunities: Opportunities for shadowing to enhance learning and development across entire setting.

Comment:

Area of Need: Hearing Impairment – pages 25 - 29

- *‘Additional support from a key adult with appropriate training to prepare for and reinforce lesson content, support language development which may include the use of signed approaches, e.g. Cued Speech, Cued Articulation, Signed Supported English (SSE), British Sign Language (BSL)’- again, this is beyond OAP as these are highly specialist approaches. The vast majority of school staff do not have this level of training. E.g. BSL Level 1 takes up to 30 weeks to complete and has a cost implication.*

Response:

The reference to BSL has been removed as it is understandable that BSL will usually be beyond OAP. We would advise that Cued Speech, Cued Articulation, and Sign Supported English (SSE) can be introduced to a setting through the support of the SAS: Sensory Team. For further information, contact sassensory@hillingdon.gov.uk.

Comment:

Area of Need: Physical Difficulties (PD) – pages 33– 35

SEN Support

- *‘Awareness of the additional teacher/therapist liaison is required to ensure appropriate balance between educational and direct therapy objectives (linked to developing holistic goals/outcomes)’ – presumably this “awareness of liaison” means release time for the teacher? This brings a cost to school for staffing cover.*

Response:

The liaison is not expected to be honours and schools can determine the best way to do this with the therapist involved e.g. email exchange, annual video call etc.

As mentioned above the Children Intergrated Therapy Service (CITS) jointly commissioned by NHS and the LA provides support at pre-statutory level for CYP on SEN Support who require therapeutic input. Therefore, each educational setting can liaise with their link therapist when required. The importance of liaison between therapist and teacher would be inclusive of the ‘reasonable additional hours’ needed to read reports and advice that may contribute towards the planning of lessons using quality first teaching principles.’

Comment:

- *'School staff to be available during therapy reviews to be trained and informed of the care plans' – again this presumes general TAs are available (in most schools they aren't).*

Response:

These meetings are intended to support implementation of pupil's therapeutical outcomes outlined in their My Support Plan. Their frequency is usually termly or annually to ensure consistency in integrated therapy delivery through daily teaching and learning.

Comment:

- *'School staff to carry out the therapy plans/strategies as advised by therapy staff to work towards the child and young person's targets' – who are these 'staff'?*

Response:

Staff who are working with the child

- *'Introduction of items such as specialist seating, height adjustable work benches, manual handling equipment to facilitate access.'* – again - funding implications

Response:

Please refer to School Equipment Funding guidance on the LEAP website [Information for SEND Professionals - Leap](#)

Comments:

OAP is normal good practice and I agree, in principle, with the document and increasing the expectation on what schools should be providing as the norm. However, there are aspects that I am a little concerned about and want to raise as points or as questions.

- *How will implementation of this be measured?*
- *What happens to schools who are not implementing this?*
- *Is further support/advice going to be withheld if schools are not using the interventions specified in the document?*
- *I think we have to be careful that we are not using exclusion strategies to promote a skewed sense of inclusion – it has to be in the best interests of the child, not inclusion 'at all costs'.*
- *Assessment over time looks different for different children so this has to be taken into consideration.*

Response:

Hillingdon is diverse Borough, where all schools should have high aspirations to meet the needs of their school community and locality. All schools should aim to be inclusive of all children both in assessment and planning to meet needs.

The LA will be creating a co-produced Inclusivity Framework setting out expectations for all schools, with a clearly defined Hillingdon Borough Definition of Inclusion. New OFSTED framework will also be setting out expectations for schools to demonstrate inclusive practice. Schools will be required to demonstrate inclusivity for all children. All CYP have a legal right to Education and under the Children and Families Act 2014 parental preference takes precedence.

What Inclusion means in Hillingdon will be determined through coproduction of the Inclusivity Framework.

Improved inclusive practice promotes awareness and a sense of belonging for all children. SEND information report is needed by schools and should be updated each year.

There will be guidance to schools what good SEND Information report looks like. We will work on this together across SEND Local Area Partnership and provide some good examples.

Comment:

Emotional Regulation:

SEN Support

- *Total Communication Approach – this is about finding and using the right combination of communication methods for each person – this takes time and money as well as highly specialist training of staff.*
- *SEN Support +*

“access to” – is reasonable but who is supporting the child to access this? The child needs to be supported to learn to self-regulate, at least initially. If a child is dysregulated, then they will be unable to access any resource without adult support

- *Risk management plan – lots of support and supervision needed to keep the child (and their peers, if applicable) safe.*

Response:

Emotional regulation, as with all executive function skills, is not a skill any child is born with and all individuals, through consistent nurturing care, a safe environment and modelling of regulatory skills develops over the course of many years (most research indicating up to 25 years of age). As such, it has become a standard practice across the local authority, as well as England more broadly, to provide emotional literacy and regulation interventions as an ordinarily available provision for all pupils. Often this will be delivered at a whole class level and may follow a manualised programme such as The Incredible 5 Point Scale, The Zones of Regulation or the Emotional Ruler. However, we do acknowledge that some individuals, in line with the graduated approach, will need an increasing level of support and individualisation, going from whole class support, to group support and then to individual support. This is why we have structured the

different levels of intervention for emotional regulation across the OAP, SEN Support and SEN Support Plus levels.

In regard with the reference to the 'risk management':

Schools in the UK have a duty to create risk management plans for children who display behaviours that could pose a risk to others. This duty is part of their broader responsibility to ensure the health, safety, and welfare of all students and staff. Key points include:

- **Legal Requirements:** Under the Health and Safety at Work etc. Act 1974 and the Management of Health and Safety at Work Regulations 1999, schools must undertake risk assessments to identify and mitigate risks to health, safety, and welfare.
- **Risk Assessment:** Schools need to assess behaviours that could cause concern, such as violent or unpredictable actions, and implement strategies to manage these risks.
- **Documentation and Review:** The findings of risk assessments should be documented, and the risk management plans should be regularly reviewed and updated to ensure they remain effective.

More detailed guidance on this is available at: [Health and safety: responsibilities and duties for schools - GOV.UK](#)

Comment:

Area of Need: Executive Functioning/ Working Memory – pages 18 - 24
SEN Support

- *'Staff liaise with parents' – when? Are support staff expected to meet with parents outside of their usual working hours?*

Response:

Staff and families should collaborate and build relationship as per Code of Practice 2015 and focus on coproduction at all levels.

Achievement for All developed guidance for Schools which details the importance of engagement with parents/carers. [Guidance for Schools](#)

Comment:

Area of Need: Hearing Impairment – pages 25 - 29

SEN Support +

- *'Where challenging, listening environments are identified, steps taken to improve, such as sound proofing of rooms or providing suspended ceiling.'* – this has capital funding implications and is not a simple solution therefore cannot be classed as a reasonable adjustment.

Response:

Yes it can be. Advice can be provided around this. I.e., soft furniture etc. Further advice can be sought from SAS and purchases would apply as per Equipment Guidance.

The Local Area Partnership will be working on Accessibility Strategy.

OAP Guidance amended as per the suggestion:

Possible reasonable adjustments to listening environments are identified, and steps taken to minimise the impact of background noise, for example rubber tips/ tennis balls on the base of chair/ table legs, carpeted flooring, working blinds at windows. If anything in addition is required, this may need a discussion with the LA regarding capital implications.

Comment:

Area of Need: Multi-Sensory Impairment (MSI) – pages 30 - 32

SEN Support +

- *This whole column is vague and lacking in detail – needs specificity. Although am I right to assume that the lack of detail for OAP is because if a pupil has MSI, then they would have the support of a fully funded EHCP?*
- *Extra bullet point should be added to remind of the availability of support from the sensory team with an MSI teacher. 'To liaise with the SAS: Sensory Team for advice on how best to facilitate the child or young person's access needs.'*

Response:

'Yes, a child or young person with MSI should be known to SAS Sensory Team. This would mean that a Specialist Advisory Teacher should be in contact to provide specific and bespoke advice on the items suggested in the OAP document. If support is needed beyond OAP, the advisor would be able to support with next steps and then the pupil would be expected to have an EHCP due to complex MSI. However, for those pupils with lower lever combined sight and hearing loss, the SAS Sensory Team would be expected to be involved.'

Suggested point has been inserted: *Staff liaise with the Sensory Team for advice on how best to facilitate the child or young person's access needs.'*

