

The Royal College of Speech and Language Therapists Northern Ireland

Consultation Response to: Draft Refreshed SEN Framework for Specialist Provision

Q1. Please select the category that best describes you as a respondent:

Other: Professional Body – Royal College of Speech and Language Therapists Northern Ireland (RCSLT NI)

Q2. Please indicate the local government district area to which your response relates:

- ☒ Antrim and Newtownabbey Borough Council
- ☒ Ards and North Down Borough Council
- ☒ Armagh City, Banbridge and Craigavon Borough Council
- ☒ Belfast City Council
- ☒ Causeway Coast and Glens Borough Council
- ☒ Derry City and Strabane District Council
- ☒ Fermanagh and Omagh District Council
- ☒ Lisburn and Castlereagh City Council
- ☒ Mid and East Antrim Borough Council
- ☒ Mid Ulster District Council
- ☒ Newry, Mourne and Down District Council

Q3: Please select the category to which your response relates:

- ☒ Early Years / Nursery
- ☒ Primary School
- ☒ Post Primary School
- ☒ Special School

Q4: Do you agree that the draft refreshed Framework clearly outlines why the EA is seeking to expand SEN provision in all schools?

- ☒ Agree

Q5: Additional comments

RCSLT NI welcomes the clear strategic rationale for expanding specialist provision. The Framework appropriately recognises the increasing demand for specialist educational provision, the growing complexity and diversity of need, and the importance of improving equity of access by reducing geographical variation across Northern Ireland. We support the ambition to ensure that children and young people can access high-quality specialist provision closer to home whilst developing sufficient capacity to meet future demand.

We recommend that the rationale is strengthened by explicitly recognising the central role of speech, language and communication in learning, participation, wellbeing and inclusion. Speech, Language and Communication Needs (SLCN) are among the most prevalent special educational needs and frequently co-occur with other areas of need, including autism, learning disability, sensory impairment, physical disability and social, emotional and mental health needs. Communication should therefore be recognised as a fundamental consideration across all specialist provision rather than being associated solely with specialist Speech and Language provision.

Whilst the Framework recognises increasing complexity of need and refers to collaborative working with Health and Social Care Trusts, it provides limited detail regarding how multidisciplinary collaboration will operate in practice or how allied health professional (AHP) provision will be planned alongside educational expansion. Successful implementation will require coordinated workforce planning across education and health, supported by clear governance arrangements, defined responsibilities and sustainable models of joint working. This is particularly important given the increasing complexity of need and the significant workforce pressures currently experienced across both education and health services.

The Framework would also benefit from greater clarity regarding how specialist educational staff will be trained, supported and enabled to develop and maintain the knowledge and skills required to meet increasingly complex needs. Without sufficient investment in workforce development and therapeutic capacity, there is a risk that expectations for specialist provision will exceed the capacity of education and health services to deliver consistently across Northern Ireland.

We also recommend stronger alignment with the Department of Education's Graduated Response Framework. Specialist provision should be explicitly positioned within a continuum of universal, targeted and specialist support, recognising that many children and young people require coordinated educational and therapeutic input throughout their educational journey rather than specialist placement alone.

Finally, whilst the Framework identifies increasing demand and geographical inconsistency, greater recognition should be given to the significant increase in identified SLCN, particularly within post-primary education. This reinforces the need not only to expand the number of specialist places, but also to ensure equitable access to high quality specialist provision across all geographical areas, educational phases and categories of need.

Q6: Do you agree that the draft refreshed Framework clearly outlines the EA's vision in the following areas:

- **That children and young people will have access to the most appropriate SEN placement which is available at their nearest suitable school with specialist provision.**

☒ Agree

- **Equitable access to excellent provision and meets the individual needs of the child or young person**

☒ Agree

- **Provides a pathway of provision for all ages and stages of development**

☒ Agree

- **Responsive to changing educational, physical and medical need**

☒ Disagree

- **Inclusive, providing opportunities for education alongside peers**

☒ Agree

Q7: Please provide any additional comments:

RCSLT NI welcomes the overall vision set out within the Framework and supports its' ambition to provide equitable, high-quality specialist provision closer to home. We particularly welcome the commitment to improving geographical equity, promoting inclusion, providing coherent educational pathways and ensuring that children and young people have access to provision that meets their individual needs.

Whilst the vision is clear and ambitious, the Framework would benefit from greater detail regarding how it will be implemented in practice. Throughout the document there are repeated references to collaboration, consistency, equity and a highly skilled workforce. However, there is limited information regarding the governance, operational arrangements, workforce planning and investment required to achieve these ambitions consistently across Northern Ireland.

The aspiration to provide specialist provision closer to home is welcomed and reflects the importance of enabling children and young people to access education within their local communities wherever appropriate. Reducing travel times can improve wellbeing, attendance, family engagement and opportunities for inclusion alongside peers. However, achieving equitable geographical access will require robust strategic area planning informed by projected need, demographic trends and local workforce capacity. There remain significant variations in the availability of specialist provision across Northern Ireland, including gaps in some geographical areas and for some categories of need. Expansion should therefore be informed by population need rather than solely by available accommodation or expressions of interest from individual schools.

We strongly support the ambition to provide equitable access to high-quality specialist provision. However, high-quality provision depends not only on appropriate accommodation but also on access to a sufficiently skilled multidisciplinary workforce. Whilst the Framework refers to a highly skilled workforce and strengthened collaboration with Health and Social Care Trusts, it provides limited detail regarding workforce planning, governance, quality assurance or how consistency of provision will be achieved across Northern Ireland. Greater clarity is also required regarding how specialist teachers and classroom assistants will be supported to develop and maintain specialist expertise, and how Health and Social Care Trusts will be resourced to provide the Speech and Language Therapists (SLTs) and wider allied health professional input required to support effective multidisciplinary practice.

RCSLT NI also strongly supports the principle of providing coherent educational pathways throughout a child's educational journey. Continuity of provision can reduce unnecessary transitions and provide greater certainty for families. However, the Framework provides limited detail regarding how these pathways will be achieved in practice. Current provision remains variable across Northern Ireland, particularly for older children and young people with SLCN. Future strategic area planning should ensure that appropriate pathways are available across all educational phases and geographical areas, including post-primary provision, rather than focusing predominantly on early intervention and primary provision.

We agree that specialist provision should remain responsive to children's changing educational, physical and medical needs. However, responding to increasingly complex needs requires ongoing multidisciplinary assessment, therapeutic intervention, workforce capacity, specialist training and regular review. Whilst staff training and collaboration are referenced, greater clarity is required regarding how education and health services will work together to ensure provision remains responsive as children's needs evolve.

RCSLT NI welcomes the clear commitment to inclusion and agrees that specialist provision should maximise opportunities for children and young people to learn alongside their peers wherever appropriate. Meaningful inclusion should also enable children and young people, wherever possible, to access specialist provision within their own local community and preferred school sector, recognising the importance of maintaining family, community and peer relationships. However, meaningful inclusion requires more than physical placement within a mainstream school. It depends upon communication-accessible learning environments, appropriately trained staff, effective multidisciplinary collaboration and reasonable adjustments that enable meaningful participation. We therefore recommend that communication accessibility is explicitly recognised as a key enabler of inclusive education across all specialist provision.

More broadly, we recommend that the Framework provides greater clarity regarding:

- how education and Health and Social Care Trusts will work together to plan, deliver and evaluate specialist provision;

- how workforce planning will ensure sufficient specialist teachers, classroom assistants and allied health professionals are available to meet increasing demand;
- how specialist staff will access ongoing professional learning, supervision and competency development;
- how consistency of provision will be achieved across Northern Ireland despite current geographical variation;
- how implementation will be monitored and evaluated to ensure equitable outcomes for children and young people.

The Framework would also benefit from recognising that specialist provision is one component of a wider continuum of support. Effective specialist provision depends upon strong links with universal and targeted services, multidisciplinary working and timely access to therapeutic support where required. Aligning the Framework more explicitly with the Department of Education's Graduated Response Framework would strengthen continuity of support throughout a child's educational journey.

Finally, communication should be recognised as a fundamental enabler of learning, participation, inclusion and wellbeing across all specialist provision. Communication needs extend far beyond specialist Speech and Language provisions and should be considered across all categories of special educational need. Strengthening this principle would further support the Framework's ambition to improve educational outcomes for all children and young people.

Q8: Do you agree that the draft refreshed Framework clearly outlines the EA's guiding principles on the following (Section 4.1):

- **Child-centred**

☒ Agree

- **Inclusive**

☒ Agree

- **Outcomes focused**

☒ Agree

- **Equitable**

☒ Agree

- **Transparent**

☒ Uncertain

- **Collaborative**

☒ Disagree

Q9: Please provide any additional comments:

RCSLT NI welcomes the guiding principles set out within the Framework and supports the emphasis on child-centred practice, inclusion, collaboration, transparency and improved outcomes. Collectively, these provide a strong foundation for the future development of specialist provision across Northern Ireland.

To strengthen the Framework, we recommend that communication is explicitly recognised as a cross-cutting principle underpinning all specialist provision. Many children and young people accessing specialist provision have SLCN either as their primary need or as part of a more complex profile. Communication is fundamental to learning, participation, wellbeing and inclusion. Communication-accessible assessment, planning and review processes are essential to ensuring that children and young people's views can be meaningfully heard, understood and acted upon, in keeping with the child-centred principles of the Framework.

We strongly support the Framework's commitment to inclusion. However, meaningful inclusion requires more than physical placement within a mainstream school. Children and young people should be supported to access learning, develop relationships and participate fully in all aspects of school life through communication-accessible environments, appropriately trained education staff, effective multidisciplinary collaboration and reasonable adjustments. Wherever possible, specialist provision should also enable children and young people to remain within their own local community and preferred education sector, recognising the importance of maintaining family, community and peer relationships.

The principle of collaboration should also be strengthened by providing clearer expectations regarding multidisciplinary working. Whilst partnership with Health

and Social Care Trusts is referenced in the Framework, there is limited detail regarding governance arrangements, shared responsibilities, workforce planning, information sharing and mechanisms to ensure consistent collaboration across Northern Ireland. Effective multidisciplinary working requires sustained investment in health services and should not rely solely on local relationships or existing capacity, as this may lead to inconsistent implementation across Northern Ireland.

The Framework would also benefit from greater clarity regarding how equity and transparency will be achieved in practice. Equity should extend beyond geographical access to include consistency in workforce expertise, therapeutic support, specialist training, quality of provision and educational pathways across all phases. Similarly, whilst transparency is identified as a guiding principle, greater detail is required regarding referral pathways, decision-making processes, agency responsibilities and accountability arrangements. Clearer operational guidance would help reduce regional variation, improve confidence among professionals and families, and promote more consistent access to specialist provision.

We also recommend that greater emphasis is placed on ensuring that schools selected to establish specialist provision have the necessary expertise, leadership and capacity to deliver high-quality specialist education. Consideration should be given not only to accommodation and sustainability, but also to inspection outcomes, specialist workforce expertise, experience of supporting children with complex needs, commitment to ongoing professional development and the school's ability to deliver consistently high-quality provision.

Finally, the Framework should recognise that successful specialist provision is measured by more than academic attainment alone. Outcome measures should include communication, participation, wellbeing, independence, emotional development, functional life skills, successful transitions into further education, employment and adult life, together with the experiences of children, young people and families. Developing multidisciplinary outcome measures across education and health would provide a more holistic understanding of children's progress and the effectiveness of specialist provision.

Q10: Do you agree that the draft refreshed Framework clearly outlines the EA's criteria and indicators for establishing a specialist provision in the following areas (Section 4.3):

- **Quality Educational Experience**

☒ Agree

- **Strong Leadership and Management by Board of Governors and Principal**

☒ Agree

- **Stable enrolment trends**

☒ Agree

- **Accessibility and Accommodation**

☒ Agree

- **Clear Commitment to Inclusion**

☒ Agree

- **Stronger links with the community**

☒ Agree

Q11: Do you agree that the vision of the EA's draft refreshed Framework aligns with the Department of Education's SEN reform agenda and five year delivery plan in the following areas:

- **Expand Specialist Provision in Schools where appropriate**

☒ Agree

- **Improve consistency of model, quality and naming**

☒ Agree

- **Reduce the need for out of area placements and long travel times**

☒ Agree

Q12: Do you agree that the draft refreshed Framework supports closer collaborative working between the EA and health and social care trusts?

☒ Disagree

Q13: Please use the space below if you wish to make any further comments on the draft refreshed Framework for Specialist Provision in Schools:

RCSLT NI welcomes the publication of the Draft Refreshed SEN Framework for Specialist Provision in Schools and supports its' ambition to deliver high-quality, equitable and inclusive specialist provision for children and young people with special educational needs across Northern Ireland. The Framework provides a positive strategic direction and reflects the increasing demand for specialist provision, the need to reduce geographical inequalities and the importance of enabling children and young people to access appropriate provision closer to home. We particularly welcome the emphasis on inclusion, improved educational outcomes, greater consistency of provision and recognition that specialist provision forms an important part of the wider continuum of SEN support. These ambitions align closely with the Department of Education's wider SEN Reform Agenda and have the potential to improve educational experiences and outcomes for many children and young people.

Whilst the vision is welcomed, the Framework focuses much more clearly on what it aims to achieve than how those ambitions will be delivered. Successful implementation will require significantly greater operational detail to provide confidence that the vision can be realised consistently across Northern Ireland. In particular, greater clarity is required regarding governance arrangements, shared responsibilities across education and health, workforce planning, sustainable funding, implementation timescales, accountability and quality assurance.

We recommend that the final Framework provides greater detail regarding:

- how specialist provision will be planned to address geographical inequalities and projected future demand;
- how consistency will be achieved across Health and Social Care Trust areas and Education Authority services;
- how specialist teachers and classroom assistants will access ongoing professional learning, mentoring and specialist support to develop and maintain expertise;
- how Health and Social Care Trusts will be resourced to provide sufficient Speech and Language Therapy and wider allied health professional capacity to support increasingly complex pupil needs;

- how multidisciplinary working will be operationalised through clear governance, shared responsibilities, referral pathways, joint planning and information sharing;
- how implementation will be monitored, evaluated and quality assured to ensure equitable provision regardless of geographical location.

RCSLT NI strongly supports closer collaborative working between education and health services. However, whilst collaboration is referenced throughout the Framework, there is insufficient detail regarding how this will operate in practice. Effective multidisciplinary working requires more than a commitment to collaborate; it requires clearly defined operational arrangements, shared accountability, sustainable investment and sufficient workforce capacity across both education and health services.

Communication should also be recognised as a fundamental component of all specialist provision. SLCN are among the most common special educational needs and frequently co-occur with autism, learning disability, sensory impairment, physical disability and social, emotional and mental health needs. Effective communication underpins learning, participation, emotional wellbeing, relationships, independence and preparation for adulthood. Embedding communication-supportive practice across all specialist provision, rather than solely within specialist Speech and Language settings, would strengthen the Framework and improve outcomes for a much wider group of children and young people.

SLTs should also be explicitly recognised as strategic partners in the planning, delivery, review and evaluation of specialist provision. Alongside direct intervention, SLTs contribute through multidisciplinary assessment, the development of communication-supportive environments, augmentative and alternative communication (AAC), and eating, drinking and swallowing (EDS) support where appropriate. They also play a key role in workforce development, collaborative problem-solving, and building the confidence and capability of education staff to support children and young people with increasingly complex communication needs.

The Framework would also benefit from a stronger focus on equitable implementation. Equity should extend beyond geographical access to include consistency in workforce expertise, therapeutic provision, staff training, quality

assurance and educational pathways across all phases of education. Future strategic area planning should continue to address regional variation in specialist provision and ensure that pathways remain available across all educational phases, including post-primary provision for children and young people with SLCN. We would encourage the EA to review whether children and young people are accessing the most appropriate provision based on assessed need, rather than local availability of specialist places.

Finally, implementation should be accompanied by clear operational guidance for schools and robust evaluation using outcomes that reflect the full purpose of specialist provision. Alongside educational attainment, evaluation should include communication, participation, wellbeing, independence, successful transitions, family experience and preparation for adulthood. These broader outcomes will provide a more meaningful understanding of the effectiveness of specialist provision and support continuous improvement across Northern Ireland.

RCSLT NI looks forward to continuing to work collaboratively with the Education Authority, the Department of Education, Health and Social Care Trusts and our service users to support the successful implementation of a high-quality, equitable and sustainable model of specialist provision across Northern Ireland.

For further information, please contact:

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