

SECTION: A single national SEND and alternative provision system

Question 1 What key factors should be considered, when developing national standards to ensure they deliver improved outcomes and experiences for children and young people with SEND and their families? This includes how this applies across education, health and care in a 0-25 system

ESPCF response: Whilst national standards sound positive on the surface, we are conscious that there is already national law, regulations and statutory guidance for SEND that covers most of the elements mentioned. We worry that new national standards could actually complicate and confuse rather than assist and clarify. Issues that arise in the existing system often relate to responsibility between schools, LAs, social care and health (who should do or pay for what), and accountability for meeting/failing to meet these responsibilities (how to address/enforce this). Without clear accountability and consequences, which are not adequately addressed by the green paper proposals, what is to stop any potential national standards simply being ignored, as legal duties too often are already? National standards will only improve outcomes and experience for CYP and their families if they focus on responsibility and accountability rather than good intentions, and don't conflict with the law. IF new national standards were to be developed, more detailed information good practice/specifics of what schools must do, and reasonable adjustments to support different needs is helpful. National standards could be helpful around training and skills for staff. There is scope for national standards along these lines. However, every child with SEND is different. It would be a huge and potentially very damaging backward step to lose the focus on assessing/meeting individual need in the law currently. Importantly - make sure goals around SEND and inclusion are not undermined by other policies and priorities particularly in education e.g. behaviour, attendance, attainment.

Q2 How should we develop the proposal for new local SEND partnerships to oversee the effective development of local inclusion plans whilst avoiding placing unnecessary burdens or duplicating current partnerships?

ESPCF response: A key area to strengthen is around the involvement of health. Health has a huge remit across the SEND lifespan and proper engagement is critical. Their engagement in current partnerships is often lacking and barriers preventing this need addressing at the outset of these new proposals, e.g. how the Partnership interfaces with decision-making in the new ICB governance structures. A national Terms of Reference for the partnerships would be helpful with clarity around delegated authorities and how it fits with other statutory partnerships such as Health and Wellbeing Boards. Proposals infer that education, health and care organisations don't understand their roles or duties, and that they can be educated/incentivised to do so. With local partnerships already in place in our areas, it is clear these organisations do understand their roles and duties, but lack of effective monitoring, performance and accountability are more the issue. Parent carers and CYP need to sit at the heart of the Partnerships. There is insufficient mention of the important role of Parent Carer Forums in the proposals overall but especially with regard to these Partnerships. There needs to be increased paid roles for Parent Carer Forums so that parents/carers have capacity to do the work required by the Partnership. There needs to be a clear roadmap for the Partnerships to follow, especially around regional and joint commissioning. Support is needed in developing the skill and knowledge base of commissioners to do this work well and for co-production to be modelled and championed by all partners.

Q3 What factors would enable local authorities to successfully commission provision for low-incidence high-cost need, and further education, across local authority boundaries?

ESPCF response: It is vital commissioners have up to date data to base their commissioning decisions on. Our neighbouring LA subcontract the management of their children's disability register to the voluntary sector which we believe gives families more confidence to sign up sharing often very personal information. This is anonymised and trends used by local commissioners. If similar data sets were captured there would be more potential for LAs to compare and analyse their data across boundaries eg at ICS level, in particular for commissioning low-incidence, high-cost services. Register data needs to be supplemented by in depth JSNAs. Again, more could be done across ICS areas to compare what these tell us and broader commissioning to avoid provision post code lottery. Local authorities need to consider who is missing from the data and find these cohorts eg children who have been out of school for a long time. The voluntary sector often has reach into the more isolated communities and could be funded to outreach, developing trusted relationships, to hear their voices, so their needs are better understood/met. Commissioning should always put children and young people and their families at the heart of the process, done in coproduction - allowing sufficient time at the start to review data, identify gaps and test out hypotheses. In Sussex, Amaze is currently supporting the three local parent carer forums to work together on a number of projects, sharing details of commissions and approaches. Local authority staff need time to work with partners cross-borders too.

Q4 What components of the EHCP should we consider reviewing or amending as we move to a standardised and digitised version?

ESPCF response: We support a standardised EHCP template, if it's good quality and effective. A standard format must clearly link each Need to associated Provision(s) and Outcomes to ensure there's provision to meet all needs, and should help schools track what they need to do and why. Space for who/what/when/where etc to help ensure specificity and quantification. Standardised template/guidance to prompt information required from families in Section A is helpful. Professionals then need to better use this to develop outcomes (rarely happens at present). Parents should contribute their expertise of their child, rather than having to hope professionals include their expertise. Template to include preparation for adulthood from Yr9. EHCPs are often short-term records of provision without long-term aims/aspirations for the child. Families need support to see the EHCP as a developmental resource rather than a receipt for current provision. Currently largely education-focussed, with health and social care too often being omitted entirely. Sections B/F, C/G and D/H need to be given equal weight. Professionals need to develop SMART outcomes with families so that they aren't presented as vague ongoing aims to which provision can be loosely linked. Must be options of both paper and digital versions of EHCPs. Holding a digital version may ease sharing but large documents are hard to read on mobile phones which many families rely on for internet access. Improve annual review documentation. For many, ARs are only a short check-in meeting rather than detailed consideration of progress in line with changing needs/aspirations.

Q5 How can parents and local authorities most effectively work together to produce a tailored list of placements that is appropriate for their child, and gives parents confidence in the EHCP process?

ESPCF response: We strongly oppose this proposal as we believe it is likely to have serious adverse effects for children/young people. It must not be taken forwards. Tribunal outcome data demonstrates that local

authorities too often identify schools which are demonstrably unsuitable for the child, so it would be illogical and potentially damaging to give them any more power to reduce parental choice. The current law – essentially that the child is entitled to the cheapest suitable school - is fair for both parties and should remain. It's not clear who you're proposing would create these 'tailored lists' however there is no option we would find appropriate to do so other than the family themselves in each case. Needs do not fit neatly into boxes; there's a myriad of reasons why a certain school may or may not be suitable for an individual child and as such no one could produce a list that is truly tailored. Also, the green paper talks of ending postcode lottery, however this proposal has the potential to have the opposite effect if local provision is poor, as local authorities may be reluctant to include out of county placements on such lists. Instead, there needs to be focus on easy to find information for families about all schools. A new duty for all schools to allow families to visit and look round before deciding on their preference would be helpful, as this is sometimes refused. This would support families whilst not reducing choice.

Q6 To what extent do you agree or disagree with our overall approach to strengthen redress, including through national standards and mandatory mediation?

ESPCF response: We strongly disagree that mediation should be mandatory. The EHCP and appeal system is weighted against families. The onus for change should be on LAs to behave lawfully get things right initially, not forcing parents into mediation. There are opportunities for open dialogue between LAs and families throughout the process so forcing mediation won't make a difference. Mediation works when parties are equal and choosing to take part. In principle, it is not appropriate for an unqualified person to try and get families to accept less support than a qualified professional has stated is required. Mandatory mediation could create the risk of mediation saturation, delays to tribunals, delays to provision being put in place in timely way. Adding a forced extra step to appeal processes could lead to delay with a child's needs being met and/or them being able to attend an education setting that is appropriate for them. Instead of mandatory mediation, LAs should be transparent about decision making, follow the legislation rather than their often-incorrect interpretations of it, and increase co-production and dialogue with families so mediation/tribunal is not needed in the first place. LAs should use a standard quality assurance checklist to ensure lawfulness, similar to that already produced by IPSEA for families for example. Where mediation is wanted, families should be able to choose from a list of mediators to feel more confident that the mediator will be impartial. LAs must send decision-makers to mediation (as per existing regulations, but with accountability/consequences for not doing so.)

Q7 Do you consider the current remedies available to the SEND Tribunal for disabled children who have been discriminated against by schools effective in putting children and young people's education back on track? Please give a reason for your answer with examples, if possible.

ESPCF response: No. The process is too long with too many hurdles for families to face. Some parent carers are burnt out from the stress of navigating/battling the SEND system and haven't got the 'mental bandwidth' to fight another battle. It's easier for them to walk away – to educate their child at home or move them to a different school. Parents worry that it will be hard to prove their child has been discriminated against, feel concerned that it could damage their working relationship with the school or scared that it could impact on their child's future at the school. A child has been failed already if their parents have to go to tribunal.

Governors can be biased towards supporting school leaders. The OFSTED complaint process is long and has many hoops to jump through. There needs to be an accessible process in place that can hold schools to account so they actually follow the Equality Act in the first place. Government Ombudsman should be able to deal with school failures. The existing process allows for remedies, but not for compensation. If compensation is a new power, it may sharpen school's minds more around discrimination. Enforce whole school training around the Equality Act and reasonable adjustments. Amend the Equality Act so it has the same strong practical guidance that the Disability Discrimination Act had. Make the Equality Act be seen as just as important as safeguarding. Ensure that those with SEND, but not necessarily a disability, are protected by the Equality Act.

Q8 What steps should be taken to strengthen early years practice with regard to conducting the two-year-old progress check and integration with the Healthy Child Programme review?

ESPCF response: There is a high turnover of staff in early years, partly due to low rates of pay. A pay and recognition strategy is needed alongside a formalised, rolling, training programme to strengthen early years practice. Earlier involvement of professionals such as speech and language and occupational therapy to ensure reviews are fully informed by relevant professionals. Access to professional support such as SALT and OT should not rely on being in an early years setting. Progress checks and reviews should be carried out with full involvement of parents/carers. They should be face to face, not simply a checklist or questionnaire to complete.

Q9 To what extent do you agree or disagree that we should introduce a new mandatory SENCo NPQ to replace the NASENCo?

ESPCF response: Neither agree nor disagree. We agree with this proposal in principle, however, there needs to be more detail on the qualification to make a fully informed view. As well as being a rigorous qualification, it needs to include training on SEND law and legal obligations for schools, how to work in co-production CYP and families. We recommend working closely with parent carer forums and other stakeholders on the design of the qualification to ensure it is as effective as possible. We believe SENCos should be an equal part of the school's senior leadership team, however this alone is not enough. Sufficient resource is needed for schools to enable SENCos to have enough time to cover all the different aspects of their role. We also believe it is essential that SEND training must form a core part of all teacher training, as well as, crucially, statutory training for head teachers to ensure whole school approaches and leadership. In addition, SEND should be part of training for subject leaders, including importantly PSHE and behaviour leads, with joined up working between these and the SENCo. Training must be regularly refreshed – such as annually, with the same importance as annual safeguarding refresher training. SEND training more broadly should include input from those with lived experience themselves of SEND. No training is ever sufficient to fully know the needs of any individual child, and therefore enough time for co-production and listening to families and CYP must be included and become central to the SENCo role.

Q10 To what extent do you agree or disagree that we should strengthen the mandatory SENCo training requirement by requiring that headteachers must be satisfied that the SENCo is in the process of obtaining the relevant qualification when taking on the role?

ESPCF response: Strongly agree. We fully support this proposal. SENCo turnover in some schools is very high as they are replaced every three years having not completed the current qualification. This can mean a school doesn't have a qualified or experienced SENCo for many years, which should not be allowed to continue. Sufficient time, support and resources must be given for SENCos to be able to get on with other aspects of their role whilst also undertaking the qualification. It must not mean that SENCOs work fewer hours in the role – it is additional capacity that is needed. Ideally, the qualification would be completed before being in the SENCo role, with an individual working towards it whilst working alongside a qualified SENCo for example, similar to teacher training placements. SENCo qualifications should be extended to further education settings. Further exploration and clarification is also required around requirements for specialist schools.

Q11 To what extent do you agree or disagree that both specialist and mixed MATs should be allowed to coexist in the fully trust-led future? This would allow current local authority maintained special schools and alternative provision settings to join either type of MAT.

ESPCF response: Neither agree nor disagree. Firstly, we do not support the move towards all schools becoming academies. We are not able to make an informed decision on this proposal as more information is needed on MATs and exploration of what the options are before we are able to decide what is the best route for children. More evidence is needed to demonstrate whether joining a MAT does actually raise standards for pupils with SEN. This has not been the experience we tend to hear from families locally. Whilst there are opportunities for sharing of good practice, expertise or experience between mainstream and special schools, there are also potential adverse effects. We are concerned that this could lead to CYP with SEND being funnelled into a particular school within a MAT, rather than encouraging inclusive practice across the schools. There are existing networks locally to facilitate schools coming together, including to sharing good practice. It is not necessary for schools to be in a MAT for this to happen.

Q12 What more can be done by employers, providers and government to ensure that those young people with SEND can access, participate in and be supported to achieve an apprenticeship, including through access routes like Traineeships?

ESPCF response: Failure to develop a long-term career plan prevents apprenticeships being explored potential opportunities. It's key that preparation for post-16 starts early, so that YP and their families have opportunity for discussion around pathways which opens up options. There's overall bias in the system with GCSEs as the goal which weakens options for 14–16-year-olds. If legislation around pathways to adulthood were properly applied, eg Annual Reviews from Year 9 onwards focused on preparation for the future, then YP and their families would have greater knowledge around apprenticeships. Where careers support is offered, YP with SEND have difficulty accessing information, advice and guidance in a group setting unless it has been appropriately differentiated. More work and life experience opportunities are needed. Many families report a lack of person-centred planning. They rely on recommendations of professionals and, unfortunately, suggested destinations may have more to do with institutional relationships than what is best

for the individual YP. With provision in EHCPs lasting until 25, YP with SEND should be able to access apprenticeships as and when they are ready for this i.e. having choice and options and the protection of the legal framework which allows for this. Supported apprenticeships need proper identification of, and planning for, reasonable adjustments. We're aware of too many apprenticeships that haven't worked out for YP. More monitoring of placements and feedback on employers to ensure they are offering the support/adjustments etc needed. Thorough EHCP provision monitoring to identify YP at risk of NEET raising opportunities for apprenticeships.

SECTION: A reformed and integrated role for alternative provision

Q13 To what extent do you agree or disagree that this new vision for alternative provision will result in improved outcomes for children and young people?

ESPCF response: Neither agree nor disagree. Neutral position. While we support the focus to make the necessary, significant, improvements in AP, we remain concerned that more detail is required around oversight, regulation and standards. From work with CYP, we know that the name "alternative" is negative. There is stigma attached to AP - suggesting CYP are less valued or outside the norm. A rebranding exercise is needed to shift this, to avoid further ongoing harm in status. There is still a concern about exclusions and attendance and the use of restraint and part-time timetables - which need to be addressed. There is concern that CYP who are from Black communities are disproportionately represented at AP and the potential for racism in the system needs to be fully explored and removed. Changes must not result in more CYP being sent to AP as there is a very real risk of it being used as a stop gap where more suitable provision is not available or as an alternative to properly assessing an individual child and meeting their needs. In our experience academies are more likely to use AP inappropriately and the new system will need to monitor for this and make them more accountable. The AP system needs to support the delivery of a full-time education. The request for AP should school led, so that a full-time plan can be developed and referrals can be coordinated. The new system must be relationship-based and trauma-informed; a genuine sense of belonging is really important.

Q14 What needs to be in place in order to distribute existing funding more effectively to alternative provision schools, to ensure they have the financial stability required to deliver our vision for more early intervention and re-integration?

ESPCF response: We agree that more stable funding arrangements are needed. If the use of AP is increased then funding must reflect this. We also think it is important that schools retain a stake in children they may move to AP so this needs to be built into the system.

Q15 To what extent do you agree or disagree that introducing a bespoke alternative provision performance framework, based on these 5 outcomes, will improve the quality of alternative provision?

ESPCF response: Neither agree nor disagree. Neutral position. While we agree it would be good to have an AP performance framework, it will not help if the measures are too crude or short-term in nature. Quality of AP and suitability for individual children is key including reporting on the longer-term outcomes. At the

moment, we know there is brilliant AP and really sub-standard AP. We are worried a performance framework may focus on things that can easily be counted or measured rather than qualitative measures particularly around mental and emotional wellbeing, self-esteem and preparation for the future and a positive life as an adult rather than short term goals. AP covers such a range of provision from very short term or transitional provision to long term therapeutic settings. The range of children who need AP is very wide. A performance framework needs to allow for this. Some children need a lot of flexibility and creative approaches to help them engage, particularly in the short term. On the other hand, provision that just holds CYP out of the way of others and doesn't have good long-term aspirations for them is unacceptable. Real care is needed in looking at whether the minimum hours requirement should apply to AP. It is not fair on CYP or their often hard-pressed families to allow part time provision to be more than a temporary arrangement. The monitoring process also needs to be able to better understand multiple disadvantage or discrimination, or intersectionality, for those attending, and put in plans to tackle this.

Q16 To what extent do you agree or disagree that a statutory framework for pupil movements will improve oversight and transparency of placements into and out of alternative provision?

ESPCF response: Neither agree nor disagree. Neutral position. We agree that more transparency and closer monitoring of who goes to AP, why and for how long is vital. We don't want more CYP being sent to AP or it being used an "easy" way out of properly assessing a child's needs. At the moment, some vulnerable children can be directed off-site without there being an effective way to record, monitor or challenge this if it is not right for the child. This needs to stop. Will the framework include proper and correct monitoring of part-time timetables? There needs to be clear criteria and exit strategies for each AP placement in place, supported by individual service level agreements showing robust transition back into School. Thought needs to be given where placements do not deliver on perceived outcomes – and the framework needs to go further to state that schools must be committed to support integration back. If transparent, the framework could be a positive way forward, offering reassurance for families and young people of a transition forwards and a way of providing oversight and clarity around placements.

SECTION: System roles, accountabilities and funding reform

Q17 What are the key metrics we should capture and use to measure local and national performance? Please explain why you have selected these.

ESPCF response: We suggest:

Numbers of:

- CYP 0-25 on DLA/PIP, with EHCP, on Disability Register, with SEND also FSM
- EHCP maintained (then by gender/age/disability type/setting); requests for EHCP; decision to assess for EHCP; decision to issue EHCP; final EHCP issued; EHCPs ceased
- SEN Support (then by gender/age/disability type/setting)
- Attainment % gap for SEN Support (across each key stage/KS2 achieving expected standards in reading/writing/maths; % gap for EHCP; other assessments/qualifications – e.g. Entry Level, and Foundation Stage

- SENCOs in leadership positions
- Mediation/appeals inc outcomes
- Exclusions/suspensions with EHCP / SEN Support
- Part-time timetables
- Home educating
- A measure for inclusive practice that is meaningful – e.g. coproduced quality mark for inclusion

Number, waiting lists and outcomes achieved from:

- SALT
- OT
- Physio
- Wheelchairs/ equipment
- CAMHS
- Wellbeing services

PHBs Social Care Numbers of

- Families under care of social worker
- LAC
- In receipt of short break (residential, outreach, direct payment), PHB

Transitions Number of:

- YP supported by Transitions Team
- NEET at 16 / 20+
- Internships/apprenticeships/employment

YP Voice

- % YP with SEND who feel their voice is listened to and, crucially, acted upon

Parent Carer Voice

- Number of PCF members/strategic meetings where PCF Parent Rep attends
- Co-production projects
- % parent carers who feel their voice is listened to and, crucially, acted upon

Other

- Carers % reporting impact on physical health / mental health
- Visits to Local Offer
- Social media posts/engagement
- SENDIASS service stats

In addition to this predominantly quantitative data, there needs to be qualitative measures collected to capture the lived experience and satisfaction, eg feedback on services and case studies.

Q18 How can we best develop a national framework for funding bands and tariffs to achieve our objectives and mitigate unintended consequences and risks?

The current law which requires children's needs to be assessed and provision put in place to meet all needs – and this must not be diluted. We are very concerned that funding bands indicate a negative culture shift away from this child-centred approach, to instead try and fit children/young people's needs into categories, which is simply not possible. Any bandings and tariffs must be sufficient to meet needs, and not to discourage education, health and care providers from supplying services that families need. The flexibility that would be required renders banding arbitrary and therefore unnecessary. We presume this proposal is in part aiming to address high INMS costs, however we don't believe this is the best way. Whilst closer scrutiny of costs of INMS schools could be helpful, addressing wider system issues is actually more needed. A child/young person is only entitled to an INMS placement when no cheaper suitable alternative is available; sufficiency of maintained specialist placements needs addressing. The DfE also needs to ensure that wider initiatives dovetail far better with SEND than they do currently to create a more inclusive culture so fewer CYP are unable to manage in mainstream schools. The push towards academies, increasingly pressured and narrow curriculum, focus on behaviour, lack of flexibility, and reduction of support staff amongst other factors, mean that mainstream schools are unsuitable for more CYP. SEND funding in schools does need to be ring-fenced, with increased scrutiny of how it is being used to improve outcomes for CYP with SEND.

SECTION: Delivering change for children and families

Q19 How can the National SEND Delivery Board work most effectively with local partnerships to ensure the proposals are implemented successfully?

The relevance and importance of the National SEND Delivery Board needs to be more explicit. The Board also needs to make itself available to listening to a wide range of voices from different sectors when assessing the performance of local partnerships. It is not clear: how the Board will hold to account organisations that are part of that Board; how parents and CYP will be involved so that co-production duties are upheld and modelled to the system; what the legal status or power of the Board will be; how it will interact with the Local Government Ombudsman and its processes/authority; how it will affect performance of social care. It would be helpful if the Board set the direction on what a new local data dashboard / balanced scorecard should look like, that the SEND partnership looks at regularly, so there is some consistency. The Board should be transparent with its proceedings and decisions published. Local families may not have a lot of confidence in the DfE/local systems because their experiences have not always been positive and so there needs to be bridge building and a focus on openness and honesty. Proposals to not make it clear how DfE region groups will monitor both spending and quality of service or outcomes, how they will juggle managing and regulating performance, or how they will intervene to hold providers to account. Meetings between the Board and local areas need to be open so can talk about the difficult things for the local area.

Q20 What will make the biggest difference to successful implementation of these proposals? What do you see as the barriers to and enablers of success?

There's variation across the system, but even the best schools are struggling to support SEND. Without sufficient resourcing and accountability, neither this green paper, nor the white, will have the impact desired. Enablers include:

- Workforce - having sufficient staff but also staff having necessary skills, training/support and leadership, employing more professionals with Lived Experience, and working with more people/carers with lived experience, more 'whole school approaches' to SEND not just SENCo-led
- Co-production with schools in particular but all services working with parents as experts; additional capacity in Parent Carer Forums to respond to this
- Schools need to be in, and fully committed to, strategic partnerships and working in co-production – LAs have legal responsibility but they don't have the power it requires of schools
- Full buy-in from health and social care
- Family voice must be central and acted upon
- Health practice needs to improve. In the meantime, risks of CYP being out of school need to be mitigated eg EOTAS / CAMHS, GPs training
- Service delivery models can block challenge/accountability, eg services commissioned by a school/LA risk not being person-centred if the service resists criticising schools/LA for fear of future contracting consequences
- Crucially, having everything more joined up at all levels, starting with the Department for Education. Attendance and behaviour guidance, the national curriculum and assessment methods, safeguarding procedures etc are all weighted against SEND currently. There must be a holistic approach and SEND CYP considered at the forefront of all policies with necessary adjustments made following an Equalities Impact Assessment.

Q21 What support do local systems and delivery partners need to successfully transition and deliver the new national system?

The parent carer forums will need more capacity to co-produce throughout the system. Key IAS (SENDIASS) services need to have capacity to inform families about changes. In 2015 the Government invested in Independent Support services to enable the change yet there is no sign of a similar investment in providing impartial advice and information here. Local Offers will need capacity and resource to be updated Increased funding for LA teams responsible for EHCPs – to help reduce individual caseloads and so they have the workforce available and capacity to implement any system or process changes whilst carrying out their normal legal duties. We need to make sure parents and children are supported and more valued by any changes. Ensure communication is clear and with a real sense of accountability, advising who is responsible for what - with a clear complaints' procedure. A national framework can produce a lot of narrative, but it does not deliver provision to address the issues. Therefore, funding will need to be made available for the additional provision and services required on the ground.

Q22 Is there anything else you would like to say about the proposals in the green paper?

Re: multidisciplinary panels - we agree in principle with this proposal, but this sort of model is already in place locally yet incorrect decisions are still too frequently made, and confidence in the system is low. Parent carers should be involved and treated as equals and experts on the panel, and paid for their time, including

reading time which is the most time-consuming aspect. In our neighbouring LA this has had a very positive impact on attitudes of other panel members and ensures it is rooted in the needs of the child and avoids parent blame. It also adds transparency and accountability to the process. Schools have also reported that it is excellent CPD, and we recommend that this should form part of the SENCo training qualification. Greater transparency is needed as to why this is only an advisory panel. We recommend that either this is a decision-making panel or if this isn't possible, then guidance should state that if the LA does not follow recommendations of the panel, this must be justified to the panel, and return to panel for further discussion with LA decision makers.

We agree strongly with the proposal to clarify the strategic and operational functions that DMC/DMCO officers in the revised SEND Code of Practice. We agree strongly with the proposal to revise the Code of Practice to encourage the adoption of DSCOs.

Overall – we do not believe the green paper proposals will bring the much needed improvements. Real accountability is still lacking.