

To what extent do England's local offer websites adhere to the statutory guidance as set out in the special educational needs and disabilities code of practice?

Jacob Matthews¹ | Kristine Black-Hawkins² | Arina Basu³ |
Andreea-Ioana Necula³ | Jonny Downs⁴ | Tamsin Ford¹ |
Jennifer Saxton¹ | on behalf of the HOPE Study

¹Department of Psychiatry, University of Cambridge, Cambridge, UK

²Faculty of Education, University of Cambridge, Cambridge, UK

³Faculty of Medicine, Titu Maiorescu University, Bucuresti, Romania

⁴Department of Child and Adolescent Psychiatry, King's College London, London, UK

Correspondence

Jacob Matthews, Department of Psychiatry, University of Cambridge, Addenbrookes, Hills Road, Cambridge, CB2 0XY, UK.
Email: jdm218@medschl.cam.ac.uk

Funding information

National Institute for Health and Care Research

Abstract

In England the 2014 Children and Families Act introduced wide ranging changes to the assessment of and provision for children and young people with special educational needs and disabilities (SEND). Guidance underpinning implementation was then published in the Code of Practice. Our study focuses on a key component of that legislation, known as the 'local offer', which requires local authorities to establish and maintain, clear, comprehensive, accessible and up to date information for children and young people with SEND, and their families, about available SEND provision. Local authorities are expected to involve children and young people and their families in co-designing and reviewing their local offer, alongside other key stakeholders, to ensure provision is responsive to local needs and aspirations. To support our assessment of local offers we first established six categories based on the criteria in the Code of Practice about expected availability of SEND-related information (e.g. financial support, health service information, accessibility information). We used these categories to evaluate the relevant local offer websites of all 151 English local authorities with legal responsibilities for SEND assessment and provision. We further assessed whether each local offer website

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included three common website accessibility functions. Our findings demonstrate variation in the availability of information at local authority level, therefore limiting the ability of some young people and families to make informed decisions about the support available to them. This provides further evidence to support growing concerns about 'postcode lottery' inequities for families and their children with SEND.

KEYWORDS

local offer, policy implementation, special educational needs and disabilities, statutory duties

Key insights

What is the main issue that the paper addresses?

This paper explores whether English local authorities provide local offer websites that adhere to legislation set out within the SEND Code of Practice, as they are legally required to do.

What are the main insights that the paper provides?

We detected considerable variation in SEND-related information presented on local offer websites across England, which contravenes current legislation and highlights the need to update and monitor the local offer websites across the country to ensure all SEND-related information is both available and accessible.

INTRODUCTION AND BACKGROUND

Implementing national systems for the assessment of and provision for children and young people identified with special educational needs and disabilities (SEND) is a highly complex endeavour. In the first decade of the twenty-first century key concerns in England, as in many other countries, included soaring costs (ONS, 2021a), significant parental dissatisfaction (Lamb, 2013) and the need to ensure that practitioners were able to meet the educational needs of all children and young people (Florian & Black-Hawkins, 2011). The subsequent introduction of major reforms in England in 2014, including the Children and Families Act (Children and Families Act, 2014), was intended to bring about substantial changes in professional practice and service provision (Castro & Palikara, 2016; Curran, 2019). These developments were operationalised through the Code of Practice (CoP) (DfE & DoH, 2015) which provided guidance for professionals from all education settings and related governing bodies, health and social services, and local authorities (LAs).

The CoP defines a child or young person as having special educational needs if they have 'a learning difficulty or disability which calls for special educational provision to be made for him or her' or 'a significantly greater difficulty in learning than the majority of others of the same age, or has a disability which prevents or hinders him or her from making use

of facilities of a kind generally provided for others of the same age in mainstream schools' (DfE & DoH, 2015:15–16). In 2022, the number of pupils in England recorded with special educational needs was 1.49 million, accounting for 16.5% of all pupils (DfE, 2022a).

Key developments embedded in the CoP included greater involvement and choice for children and parents/carers in decision making about provision, earlier identification of needs, strengthened collaboration between education, health and social care, and an expanded SEND age group of 0–25 years (Norwich & Eaton, 2015). There was also a novel mandate for LAs to publish a local offer (LO) for SEND. An assessment of this development is the focus of our paper.

Local offers

According to the CoP, local offers fulfil two purposes. The first is to provide 'clear, comprehensive, accessible and up-to-date information about the available [SEND] provision and how to access it'. The second is 'to make provision more responsive to local needs and aspirations' by directly involving children and young people and their families in co-designing and reviewing their LOs with other key stakeholders (DfE & DoH, 2015: 59–60). An example of the required information within the LO includes 'post-16 education and training provision', and 'support to help children and young people move between phases of education' (DfE & DoH, 2015: 66–67). Therefore, we believe that the LO represents a potentially crucial information resource for families and practitioners. Well designed LOs could promote understanding and informed decision making about the support that is available and sought for children. A bolder vision for LOs that are truly responsive to stakeholder input is that they become a route to enhanced realisation of rights and reduced inequities, as people are more aware of their statutory entitlements and can make rights-based arguments to reshape services to better suit local needs, as well as to hold LAs to account when they do not meet their legal obligations about service provision as outlined in the LO. The LO was seen as an attempt to end the conflict that exists between parents and statutory authorities through encouraging co-production of services (Lamb, 2013). This is of great importance given the difficulties facing parents of children with SEND, with disparities between the most privileged and the most disadvantaged families having widened, with some being able to assert their rights to SEND support while others cannot (Warnock, 2023). The LO could therefore be used as a tool to improve service design and implementation, as well as being a resource that is co-developed with service users to help drive quality improvement.

The CoP describes what the LO 'must' (legally) and 'should' include. For example, LAs must engage young people directly in developing and reviewing the LO (CoP Section 4.11), and LAs should ensure that they have access to good quality data to inform their decisions when reviewing provision and taking action to develop their LO (CoP Section 4.28) (DfE & DoH, 2015; 62–66). Further information that is covered includes the quality of services and outcomes achieved, assessment arrangements, training provision, transport, mediation arrangements and rights of appeal (Lamb, 2013). Finally, the CoP states clearly that the initial LO is to be the start of an ongoing process, subject to further development and revisions with the help of regular reviews and consultations (DfE & DoH, 2015; Long et al., 2020).

Concerns with the LO were raised early in the implementation process, with the National Sensory Impairment Partnership stating that the development of LOs needed to be proactive in engaging parents and young people from low-incidence groups such as sensory impairment (DfE, 2015). Concerns were soon raised about the lack of guidance about the 'real world' implementation of these SEND system reforms (Hellawell, 2017). Growing dissatisfaction with its adversarial nature and delays to or failure of implementation were voiced by a

wide range of stakeholders, including parents and carers (Boesley & Crane, 2018; Ko, 2015; Palikara et al., 2019). More recently, the Government's Green Paper 'SEND Review: Right support, right place, right time' includes proposals to make SEND services more responsive and consistent regardless of where a child or young person lives, along with several other system changes (DfE, 2022b, 2023). The LO remains a component of the Department for Education's future plans for SEND provision (DfE, 2023), which aim for greater accountability and measurement of key SEN services.

To our knowledge, following extensive reviews of the literature associated with SEND, organisations such as NATSPEC have explored specific criteria relating to post-16 provisions within the LO, and OFSTED include the LO as part of their local area inspections, but to date the extent that LOs adhere to the legally mandated 'must' and recommended 'should' criteria is yet to be assessed in detail. This is despite a report in 2014 that stated that ensuring that the LO remained up to date was crucial for their utility for parents, young people and professionals moving forward (DfE, 2014). Our study used techniques from document analysis (Bowen, 2009) to develop a framework to examine LA-level adherence to the CoP about the LO and how this varies across England. Our findings might then usefully inform the proposed changes in the Green Paper (DfE, 2022b, 2023), which at the time of writing have yet to be formalised in legislation.

Aims and objectives of the study

Our overall aim was to assess the extent that all LAs in England provide clear, comprehensive, accessible and up-to-date information about available SEND provision and how to access it through their LO websites, as required by the CoP (DfE & DoH, 2015, 4.2).

Our research objectives were to:

1. Assess each LO website for adherence to a subset of requirements described in the CoP.
2. Assess LO websites against three key accessibility features: inclusion of an accessibility statement, an accessibility assistive toolbar for users with visual impairments, and a language translation feature to assist those whose first language was not English.
3. Describe local and regional variation in LO adherence to the CoP and accessibility features.
4. To summarise common strengths and weaknesses of LO websites and recommend actions to address gaps in the information provided.

This study is nested within a larger England-wide study examining the links between SEND provision and health outcomes for children and young people throughout education, including how far such provision is fair and equitable (NIHR, 2021).

METHODS

Identifying LAs

We downloaded the complete list of 343 local area entities in England from the local government structure and elections website in August 2021 (Department for Levelling Up Housing and Communities, 2021). From this total we excluded 192 district councils because they were solely concerned with housing applications and refuse management (Department for Levelling Up Housing and Communities, 2021), leaving 151 LAs with responsibility for SEND. These comprised:

- metropolitan districts ($n=36$);
- London Boroughs (including the city of London) ($n=33$);
- unitary authorities (including the Isles of Scilly) ($n=56$); and
- county councils ($n=26$).

Using the Office for National Statistics (ONS, [2021b](#)) definitions our sample covered the following regions:

- East Midlands ($n=9$ LAs);
- East of England ($n=11$ LAs);
- London ($n=32$ LAs);
- North East ($n=12$ LAs);
- North West ($n=23$ LAs);
- South East ($n=20$ LAs);
- South West ($n=15$ LAs);
- West Midlands ($n=14$ LAs); and
- Yorkshire and the Humber ($n=15$ LAs)

Identifying CoP criteria relating to the LO

Our primary data source was each LA's local offer website, but where possible we also examined annual reports, policy documents, surveys and meeting minutes provided they were linked via the original LO website. The CoP describes the requirements for LAs in relation to their LO and specifies that any including the word 'must' are legal obligations, while those stating 'should' are expected to be implemented and omission requires explicit justification (DfE & DoH, [2015](#), Section 4). Within this section of the CoP there are 62 individual items (criteria) relating to the information that should be included on each LAs website.

We evaluated criteria from both the 'must' and 'should' categories, as we considered that both were essential in helping young people, their families and practitioners navigate the SEND system. First, we listed all CoP criteria which referred to the 'LA', 'Local Offer', 'SEND' and 'children and young people'. We broke down criteria with multiple clauses in order to individually assess discrete aspects of the criteria. For example, in the health section (DfE & DoH, [2015](#), 4.40) instead of assessing 'speech and language therapy and other therapies such as physiotherapy and occupational therapy and services relating to mental health' as one criterion, we assessed information about each type of therapy separately.

We excluded CoP criteria that solely focused on duties of early years providers, schools or colleges (because LAs are not directly involved), for example section 4.34 of the CoP, which states, 'schools must publish more detailed information about their arrangements for identifying, assessing and making provision for pupils with SEND'. We also excluded criteria where LAs were jointly responsible for an outcome, such as Joint Strategic Needs Assessments or where another organisation (e.g. early years provider) was responsible for cooperating with LAs, as our focus was LA adherence, and we were unable to assess the input from the other parties. Finally, we removed duplicate criteria that featured in multiple chapters of the CoP, prioritising more specific and detailed criteria over the more general and less specific which are more subjective to assess. We cross-checked our initial list of criteria ($n=127$) against LO subcategories within section 4 of the CoP to ensure all concepts were included (DfE & DoH, [2015](#)), for example, criteria that included assessments of whether the LA was 'keeping the local offer under review'.

Developing the evaluation framework

Four members of the researcher team developed a pilot evaluation framework, including the evidence needed to verify whether each LO adhered to each CoP criterion. We obtained the website addresses for all 151 LOs through online searches of LA names and navigating to the LO websites via the LAs home page. Three researchers independently tested the usability of the evaluation framework for six randomly selected LO websites. After revising the framework, each reviewer then assessed the reliability of the framework with two further LO websites to evaluate the reliability of the scoring between reviewers. Piloting revealed remaining duplication between the 127 criteria while several others proved too subjective to be consistently and fairly assessed, leaving 51 criteria (27 must, 24 should) as listed in [Table S1](#) in the supplementary materials. We also introduced further protocol instructions to improve consistency of our evaluations, for example the minimum and maximum number of searches each reviewer could make for each criterion. This second round of piloting resulted in high levels of inter-rater reliability with percentage agreements of 92.6% (Pilot 7) and 94.4% (Pilot 8) between all reviewers for the LO websites assessed. Owing to these high levels of agreement, four researchers were each randomly assigned one quarter of LA websites to assess.

The final list of 51 CoP criteria were encompassed within six distinct overarching categories comprising:

1. local offer development (12 items);
2. accountability (six items);
3. health services (12 items);
4. Education Health and Care Plans (EHCP) (nine items);
5. financial support (six items); and
6. access to education (six items).

These category titles were developed by the research team and aimed to map on to groups of criteria (e.g. health services and access to education) covered within section 4 of the CoP (DfE & DoH, 2015). The categories, criteria and the evidence needed to confirm LO adherence, are presented in [Table S1](#) in the supplementary material. [Table 1](#) details the 'must' and 'should' criteria included in each category and examples of how this was assessed.

Website assessment procedure

The evaluation of LO websites was completed between December 2021 and June 2022. Based on the 'three-clicks rule' as a global standard for designing and organising websites (Glasse & Glasse, 2005), the final protocol specified that:

1. evaluations of each criterion must begin from the LO homepage;
2. if a search term was present in the criterion it should be used, but the researcher could include a maximum of three alternative search terms, after which adherence to the criterion would be recorded as 'no';
3. similarly, the researcher could follow a maximum of four hyperlinks to find the relevant information, after which adherence to the CoP was recorded as 'no';
4. ambiguity or uncertainty in assessment of any LO criterion required review by a second researcher so that all criteria could be coded as 'yes' (information included) or no (information not included).

TABLE 1 Criteria and evidence used to assess Local Offer^a adherence the special educational needs and disabilities (SEND) Code of Practice^b.

| Category | Number of criteria in category | 'Must' criteria in category ^c | 'Should' criteria in category | Example of evidence to verify adherence | Example of evidence to verify adherence |
|-------------------------|--------------------------------|--|-------------------------------|---|--|
| Local offer Development | 12 | 8 | 4 | Is there an explanation of what the local offer is on the local offer home page? | Local offer page has been updated within the last 12 months |
| Accountability | 6 | 3 | 3 | Local offer contains links to other sources of information about SEND provision, or contact details for further information | Local offer includes text aimed at children and young people with specific SEND type (e.g. via a sub-heading) |
| Health services | 12 | 2 | 10 | Does the local offer detail how the parent carers' wellbeing is assessed? Also known as a 'carer's assessment' | Is there additional information about all the following available services: relating to mental health |
| EHCP | 9 | 4 | 5 | Are the statements setting out eligibility criteria clear and simple, e.g. plain language, bullet points or checklist? | Is there information provided on how the LA will include parents and children and young people in the assessment process? |
| Financial Support | 6 | 6 | – | Is there a description of the services across health care for which personal budgets can be used? | – |
| Access to education | 6 | 5 | 1 | Does the local offer include available schools within the local authority? | Is there information included about support and/or training offered to children and young people to help them use transport? |

^aLocal offer for SEND: local authorities are legally required to publish a local offer for SEND, which is intended to set out in one place information about provision they expect to be available across education, health and social care for children and young people in their area who have SEN or are disabled, including those who do not have an Education, Health and Care Plan (EHCP) (Department for Education and Department for Health, 2015).

^bThe SEND Code of Practice sets out statutory guidance on duties, policies and procedures relating to Part 3 of the Children and Families Act, 2014 and associated regulations and applies to England (Department for Education and Department for Health, 2015). From which we drew out a subset to assess local offer adherence to these statutory requirements.

^cIn the Code of Practice, where the text uses the word 'must' it refers to a statutory requirement under primary legislation, regulations or case law. Where the text uses the word 'should' it means that the guidance contained in this Code must be considered and that those who must have regard to it will be expected to explain any departure from it (Department for Education and Department for Health, 2015).

Researchers were free to use search bars and hyperlinks embedded within the LO websites, or other navigation functions on the LO or LA website to locate the required information.

Assessment of LO website accessibility criteria

No specific criterion in the CoP referred to accessibility features of LO websites but many potential users have additional needs that may affect their effective engagement with a standard website interface, such as speaking English as an additional language or a visual impairment. Following discussion of our initial results with the research projects steering group, including researchers, parents and SEN professionals from health and education backgrounds in June 2022, we added an evaluation of three key accessibility features of each LO website. Our aim was to align with the CoP's aim 'to provide clear, comprehensive, accessible and up-to-date information about the available provision and how to access it' (DfE & DoH, 2015). These were:

1. local offer website contained an accessibility statement;
2. a functioning accessibility options bar was present to increase readability and reach (ReachDeck, 2023; ReciteMe, 2023); and
3. there was a language translation function.

Data extraction, scoring and analysis

We recorded the individual outcomes of our LO assessments and calculated descriptive statistics (total scores and percentages for each of the six COP categories) in Excel. We further organised the data nationally, by region and 'must' vs. 'should' criteria as defined in CoP. We calculated median percentage adherence and inter-quartile range (IQR) for each criterion, and at each level of organisation. CoP criteria and accessibility items were scored: yes = 1 (criteria was included), and no = 0 (criteria was not included). Using Stata (version 17) we generated frequency-based dotplots to illustrate variation in LO adherence to the six CoP categories across all 151 LAs. We also created a Venn diagram to highlight differences and similarities in the extent that all LO websites adhered to the three accessibility functions.

RESULTS

Variation at local-authority level

Each graph in Figure 1 relates to one of the six categories established in our evaluation framework and details LA adherence (whether criteria is included on LO website) across England. The first of these illustrates considerable variation in adherence to CoP criteria concerning the *development of the local offer*, with many websites scoring poorly in relation to information about financial support, and to a lesser extent the *accountability* criteria. In contrast, there was less variation and better adherence to *access to education* and *health services*, as well as *EHCP*, although outliers were still present.

Figure 2 illustrates that only 28% of LO websites included all three accessibility criteria, and 9% included none. Some 92% of LO websites included an accessibility statement, 51% had a language translation feature and 32% had an accessibility function bar.

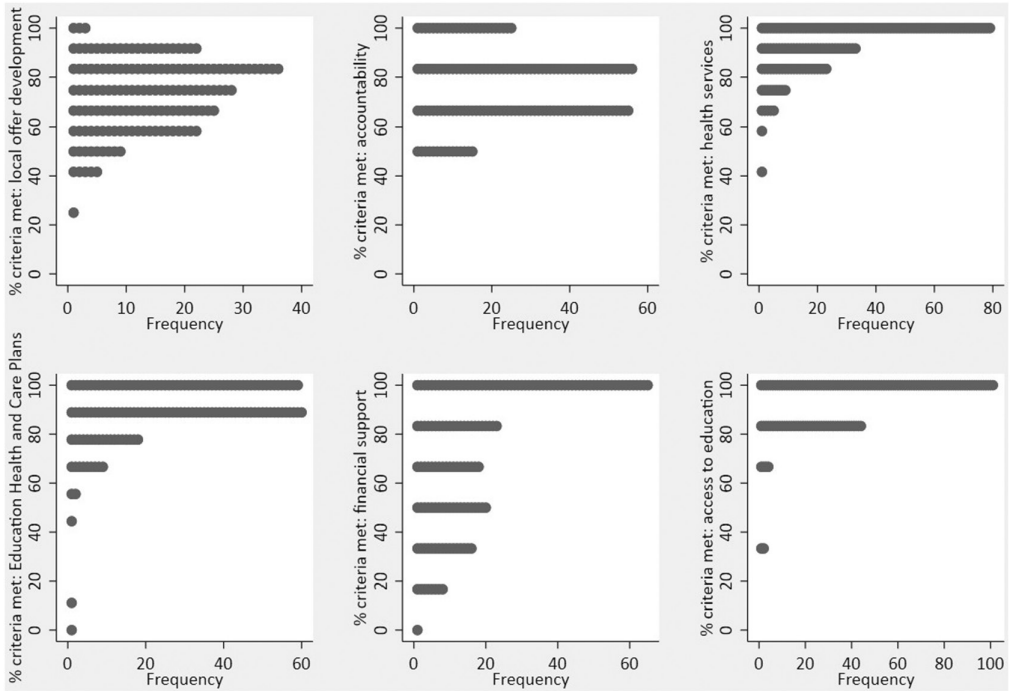


FIGURE 1 Variation in adherence of local offer websites to selected criteria from the SEND Code of Practice (N= 151).

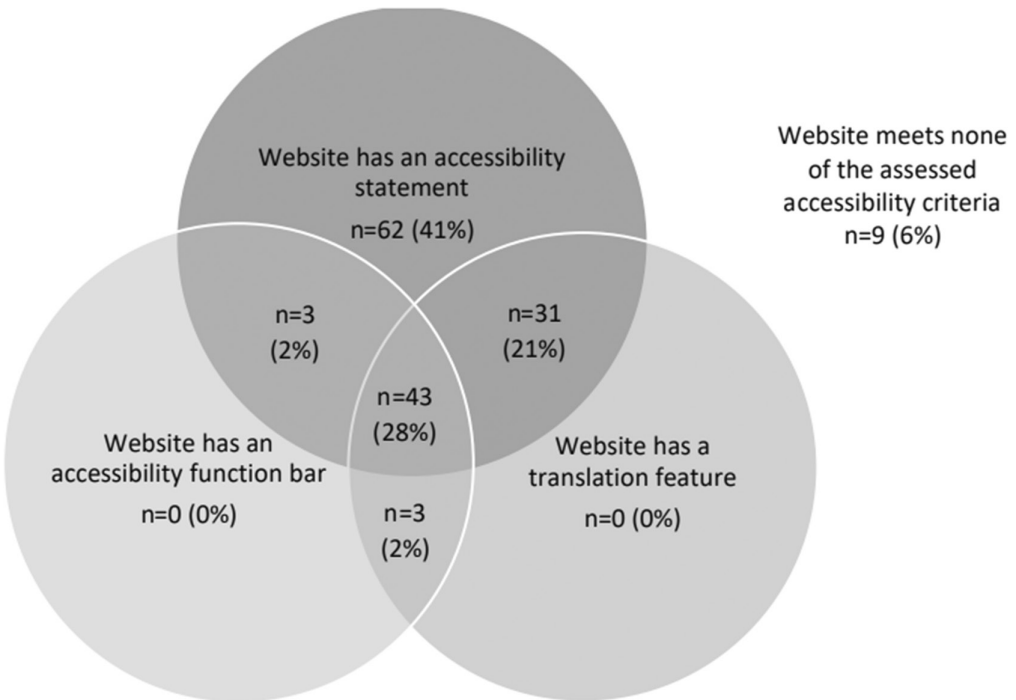


FIGURE 2 Unique and overlapping adherence of local offers to three accessibility criteria (N= 151).

England-wide variation in adherence to 'should' and 'must' criteria, and by region

National median adherence was 78% (IQR=14.81) for the 'must' criteria, with highest scores from the East of England (IQR=11.11), South East (IQR=11.11) and South West regions (IQR=7.41) (all with a median of 81%) and lowest from the East Midlands (median=70%, IQR=14.81). The England-wide median score for 'should' criteria was higher at 92% (IQR=12.5) and the highest scoring region was the East Midlands (median=96%, IQR=8.3), whereas the lowest scoring region was the West Midlands (88%, IQR=11.46). The full breakdown of region-based analysis across all six categories is presented in [Table 2](#).

The total LO score (51 items) had an England-wide median of 84% (IQR=11.76). The highest scoring regions with a median of 87% included the North East (IQR=10.29) and South West (IQR=6.38), while the West Midlands was the lowest scoring region (median=80%, IQR=11.76).

The LO development category (12 criteria) explored how the LA had originally and continuously developed the LO website. The national median was 75% (IQR=16.67) which ranged from 83% (IQR=22.92) from Yorkshire and the Humber to 67% (IQR=16.67) in the East Midlands. The highest scoring criterion in this category was 'Children and young people with SEND and parents should be included in developing support (Parent Carer Forums and voluntary organisations)' included by 99% of LAs. In contrast, we could only confirm that 8% of LAs included 'complied with the Equality Act 2010 when preparing the local offer', which was one of the lowest scoring criteria in this study.

The accountability category (six criteria) explored whether the website included information for a broad range of individuals (e.g. young people from specific age groups). The England-wide median was 83% (IQR=16.67), which was achieved by six regions: East of England (IQR=16.67), London (IQR=16.67), North West (IQR=16.67), South East (IQR=16.67), South West (IQR=33.33) and Yorkshire and the Humber (IQR=16.67). The lowest scoring regions included the North East (IQR=16.67) and the West Midlands (IQR=16.67) (median=67%). The joint highest scoring criteria were both reported by all LAs: 'The local offer includes signposting in the form of internal hyperlinks to navigate to different parts of the website' and 'local offer contains links to other sources of information about SEND provision or contact details for further information'. The lowest scoring criterion for this category was the second lowest scoring of all criterion: 'LA website include arrangements for people without internet access to obtain a copy of the local offer'; only 31% of LAs included this information.

The health services category (12 criteria) explored available health services. Six regions scored 100%, which was also the England-wide median (IQR=16.67), namely East of England (IQR=12.5), London (IQR=8.33), South West (IQR=8.33), West Midlands (IQR=16.67) and Yorkshire and the Humber (IQR=16.67). The lowest scoring region was the East Midlands (IQR=8.33) with a median of 93%. The highest scoring criterion for this category was reported by all LAs: 'Is there additional information relating to services for mental health'. The lowest scoring criterion for this category was 'Does the local offer detail how the parent carers wellbeing is assessed?', which was reported by 77%.

The EHCP category (nine criteria) assessed information about the EHCP process. The England-wide median was 89% (IQR=11.11). Two regions scored 100%: the South East (IQR=11.11) and West Midlands (IQR=19.44). The lowest scoring region was the East Midlands (median 86%, IQR=0). The highest scoring criterion for this category was 'Is there information provided on how to request an EHCP assessment?' reported by 98% of LAs. The lowest scoring criterion for this category was; 'Are the statements setting out eligibility criteria clear and simple?', suggesting 'plain language, bullet point or checklist', which was reported by 47% of LAs.

The financial support category (six criteria) explored sources of financial support available to LA residents with an England-wide median of 83% (IQR=50). Two regions scored 100% (East of England, IQR=25 and South West, IQR=41.67). The lowest scoring region was the West Midlands with a median of 58% (IQR=45.83). The highest scoring criterion for this category was 'Is there information about the option of having a personal budget?' reported by 99% of LAs, while the lowest scoring criterion for this category was 'Is there a description of the services across social care for which personal budgets can be used?' included by 64% LAs.

The access to education category (six criteria) explored options for young people aged 0–25 about different types of education. Seven regions scored 100%, which was also the England-wide median (IQR=16.67), these included London (IQR=16.67), North East (IQR=4.17), North West (IQR=16.67), South East (IQR=4.17), South West (IQR=16.67), West Midlands (IQR=12.5) and Yorkshire and the Humber (IQR=16.67). The lowest scoring region was the East of England with a median of 83% (IQR=16.67). The highest scoring criterion for this category was 'Does the local offer include available schools within the local authority?' reported by all LAs. The lowest scoring criterion for this category was 'Is there a published transport policy statement including arrangements for young people 16–19 and learners with learning difficulties and disabilities up to the age of 25 to access further education for the year 2021?' reported by 73% of LAs.

Adherence to accessibility criteria varied widely by region from 100% (IQR=50) in the North West, to 33% in the East Midlands (IQR=33.33), North East (IQR=41.67), South East (IQR=33.33), South West (IQR=16.67) and Yorkshire and the Humber (IQR=16.67). The England-wide median for adherence to accessibility criteria was 66.67% (IQR=66.67).

DISCUSSION AND RECOMMENDATIONS

Our study is the first to evaluate the extent to which LO websites in England adhere to legislative guidance set out in the CoP (DfE & DoH, 2015). We assessed website compliance with six distinct groups of CoP criteria and three common accessibility criteria. We considered variation in LO adherence to these criteria at local and regional levels, and whether the information 'must' (legally) or 'should' have been provided, as denoted in the CoP.

Four key messages arise from our analyses. Firstly, there is considerable variation in LO websites across England, with examples of excellent websites in terms of navigability and content, but also some that performed poorly. Of particular concern was the large number of websites with low adherence to information about financial support for SEND, the development of the LO and to a lesser extent the EHCP process. More promising was information about health services and access to education. Nevertheless, most assessed categories included some very low-performing outliers. Common omissions included information about post-16 transition to adult services (absent for approximately one-quarter of websites). Transition to adult services is often very difficult for young people and their families and should be an area of focus for this particularly vulnerable group (Anderson et al., 2022). Even more frequently omitted (by approximately half of websites) was the involvement of relevant educational and health bodies in the development of the LO. This contradicts one of the main tenets of the CoP and reinforces why these reforms could be causing such frustrations for practitioners working with young people with SEND in both education and health services (Boesley & Crane, 2018; Palikara et al., 2019). Lack of reporting on LO websites does not necessarily equate to a lack of multi-agency involvement in LO development or SEND provision, but our findings suggest that this category requires the most attention for many LAs. Overall, these findings reinforce growing concerns that significant aspects of SEND provision are based on a 'postcode lottery' (Hutchinson, 2021, 7), rather

TABLE 2 Median percentage of SEND Code of Practice and accessibility criteria met by local offers, by region of England^{a,b,c}.

| Region ^d | Percentage of SEND code of practice criteria met (IQR) | | | | | |
|---|--|-------------------------|-------------------------------|---------------------|-----------------------|-------------------------------------|
| | 'Must' criteria (/27) | 'Should' criteria (/24) | Local offer development (/12) | Accountability (/6) | Health services (/12) | Education Health and Care Plan (/9) |
| East Midlands (9 local authorities) | 70 (14.81) | 96 (8.3) | 66.67 (16.67) | 79.63 (16.67) | 93.33 (8.33) | 86.42 (0) |
| East of England (11 local authorities) | 81 (11.11) | 92 (14.58) | 75 (8.33) | 83.33 (16.67) | 100 (12.5) | 88.89 (11.11) |
| London (32 local authorities) | 80 (18.52) | 92 (9.38) | 70.83 (18.75) | 83.33 (16.67) | 100 (8.33) | 88.89 (13.89) |
| North East (12 local authorities) | 80 (12.96) | 92 (5.21) | 75 (25) | 66.67 (16.67) | 95.83 (10.42) | 88.89 (0) |
| North West (23 local authorities) | 78 (18.52) | 92 (12.5) | 75 (20.83) | 83.33 (16.67) | 91.67 (16.67) | 88.89 (16.67) |
| South East (20 local authorities) | 81 (11.11) | 92 (5.21) | 75 (25) | 83.33 (16.67) | 91.67 (16.67) | 100 (11.11) |
| South West (15 local authorities) | 81 (7.41) | 92 (4.17) | 75 (16.67) | 83.33 (33.33) | 100 (8.33) | 88.89 (11.11) |
| West Midlands (14 local authorities) | 76 (13.89) | 88 (11.46) | 66.67 (14.58) | 66.67 (16.67) | 100 (16.67) | 100 (19.44) |
| Yorkshire and the Humber (15 local authorities) | 78 (12.96) | 92 (8.33) | 83.33 (22.92) | 83.33 (16.67) | 100 (16.67) | 88.89 (5.56) |
| National (151 Local authorities) | 78 (14.81) | 92 (12.5) | 75 (16.67) | 83.33 (16.67) | 100 (16.67) | 88.89 (11.11) |

^aSEND = Special Educational Needs and Disabilities, defined as a child having significantly greater difficulty in learning than their same-age peers, or have a disability which prevents them from making full use of facilities usually provided for children their age (Department for Education and Department for Health, 2015).

^bThe SEND Code of Practice sets out statutory guidance on duties, policies and procedures relating to Part 3 of the Children and Families Act, 2014 and associated regulations and applies to England (Department for Education and Department for Health, 2015). From this we drew out a subset to assess local offer adherence to these statutory requirements.

^cLocal offer for SEND: local authorities are legally required to publish a local offer for SEND, which is intended to set out in one place information about provision they expect to be available across education, health and social care for children and young people in their area who have SEND, including those who do not have an Education, Health and Care Plan (Department for Education and Department for Health, 2015).

^dRegions are defined as the highest tier of sub-national division in England (ONS, 2021a; ONS, 2021b).

Abbreviation: IQR, Inter-quartile range.

| Financial support (/6) | Access to education (/6) | Overall proportion met (/51) | Percentage accessibility items for local offer websites (IQR) | | | |
|------------------------|--------------------------|------------------------------|---|--------------------------------------|----------------------|--|
| | | | Included accessibility statement? | Functional accessibility options bar | Translation function | Percentage accessibility criteria met (/3) (IQR) |
| 62.96 (66.67) | 98.15 (0) | 82.35 (7.84) | 100 (0) | 0 (0) | 0 (0) | 33.33 (33.3, 100) (33.33) |
| 100 (25) | 83.33 (16.67) | 83.33 (5.88) | 100 (0) | 0 (0) | 100 (0) | 66.67 (33.3, 100) (50) |
| 83.33 (50) | 100 (16.67) | 84.31 (13.73) | 100 (0) | 0 (1) | 100 (1) | 66.67 (0, 100) (66.67) |
| 91.67 (16.67) | 100 (4.17) | 87.25 (10.29) | 100 (0) | 0 (1) | 0 (1) | 33.33 (33.3, 100) (41.67) |
| 83.33 (50) | 100 (16.67) | 86.27 (11.77) | 100 (0) | 100 (1) | 100 (0) | 100 (0, 100) (50) |
| 83.33 (33.33) | 100 (4.17) | 87.25 (6.38) | 100 (0) | 0 (0) | 0 (1) | 33.33 (0, 100) (33.33) |
| 100 (41.67) | 100 (16.67) | 84.31 (4.9) | 100 (0) | 0 (0) | 0 (0) | 33.33 (0, 66.7) (16.67) |
| 58.33 (45.83) | 100 (12.5) | 80.39 (11.76) | 100 (0) | 0 (1) | 100 (1) | 66.67 (33.3, 100) (66.67) |
| 83.33 (41.67) | 100 (16.67) | 84.31 (7.84) | 100 (0) | 0 (0) | 0 (1) | 33.33 (33.3, 100) (16.67) |
| 83.33 (50) | 100 (16.67) | 84.31 (11.76) | 100 | 0 | 100 | 66.67 (66.67) |

than the actual needs of individual children and young people and the families that support them. We hope that the government's plan for local inclusion data dashboards will allow for better monitoring and strengthened accountability to drive service improvement based on real-time data and feedback, including about the LO for SEND (DfE, 2023).

Secondly, we observed that in most regions there were examples of good and poor LO websites. The government's SEND improvement plan (DfE, 2023) sets out a role for regional partnerships and information sharing, which could support the development of the content and design of LOs and their websites. Certainly, our findings highlight the need for more scrutiny of LO websites, which should involve local key stakeholders, including parents and carers, children and young people, education and health service providers, and at higher levels of governance, such as within OFSTED/C are Quality Commission local area SEND inspections.

Thirdly, there was slightly better adherence to 'should' as opposed to 'must' criteria, which is counterintuitive, as the latter is a legal requirement. This could suggest misinterpretation and/or misapplication of the CoP. The CoP is due to be revised through the course of upcoming SEND reforms, which also emphasise national standards. The CoP is a 292-page document, which could be streamlined for the purposes of improving local implementation. Our findings support commentary that there has been a lack of guidance about how the 2014 SEND reforms can be implemented in the 'real world' (Castro & Palikara, 2016). Key components of the LO that are part of national legislation should never vary locally (e.g. EHCP process and timelines, routes of redressal). It is our recommendation that these sections of LO websites should be identical regardless of location and easily navigable, with comprehensive content and accompanying 'how to' guides. We found numerous examples of excellent designs that could be used as potential templates. In turn, this would allow individual LAs to focus on what is important locally, such as the responsiveness and planning of SEND services, achieved through meaningful dialogue with service users.

Finally, most LOs websites did not adequately consider the additional needs of many of their users, either in content or usability, which could exacerbate socio-demographic inequalities. Only 28% of LO websites included all three of the basic accessibility features that we assessed. Therefore, some parents/carers and young people whose first language is not English, or who struggle to read information with standard interfaces and colours may not be able to effectively access LO websites. We recommend immediate investment in accessibility tools such as ReachDeck and Reciteme, and language translation features (e.g. Google Translate) for all LO websites. Similarly, language could be simplified with the end-user in mind. In the EHCP category, few websites used plain language, bullet points or checklists, which is crucial to engage children, young people and parents in a participative way, so that they are fully and genuinely involved in the decisions that affect them (Robinson et al., 2018). The proposed shift in EHCP applications online (Department for Education, 2023) emphasises the importance of clear and simple explanations of eligibility criteria. Very few LOs mentioned the Equality Act 2010, or stated objectives towards ensuring that it was complied with in the next phase of LO development, which is a requirement in the CoP. This common oversight of LO websites is symbolically troubling and could indicate potentially lower prioritisation of young people's disability rights and consideration of inequities based on protected characteristics such as race. There is emerging evidence that when children's rights are prioritised in policy, health outcomes can improve (The British Academy, 2022). In line with the CoP, we believe rights-based objectives such as from the Equality Act 2010 should be mandatory for all LOs. It is also telling that 6% of households lack access to the internet at home in December 2021 (OFCOM, 2022), yet many LO websites did not signpost to offline resources or other means to access the LO.

Local offers and their accompanying websites are intended to provide parents/carers, young people and professionals with comprehensive SEND-related information about services and processes. They are a potentially crucial first port of call for those in the

early stages of noticing that their child may have additional needs. Local offers are also supposed to function as a responsive tool, co-designed with service users and frequently reviewed to ensure local SEND services can meet the needs and aspirations of the local population (DfE & DoH, 2015: 59–60). At the time of assessment, local authorities had had 7 years of opportunity to develop their LO websites. Our findings suggest the bold aims for the LO are unlikely to be realised without quality improvement actions.

We believe that our findings provide a baseline assessment and template for quality improvement. Despite areas of strength, crucial information is still missing from most LO websites, with some requiring substantial updates to reach the standards required by the CoP. Revisions provide an opportunity to ensure LOs are co-designed and reviewed with young people with SEND, their families and key stakeholders. Ideally this should be coupled with annual publications of their feedback, and actions to ensure that the LO remains responsive to local needs (DfE & DoH, 2015). Our findings could form the basis of local discussion to facilitate improvements to LO websites, and critically to improve local provision and working relationships.

Study limitations

Our study benefited from a systematic approach to assessment of all LO websites in England and a rigorously defined and manualised framework of evaluation derived from the CoP. However, there was inevitably an element of subjective assessment and we had to exclude some criterion from our evaluation because they could not be assessed reliably. The high level of inter-rater agreement indicates reliable assessment of the criteria that were included.

Owing to resource constraints we were unable to assess the quality of the information provided on each website (e.g. sufficient detail to fully inform parents about the EHCP process). Similarly, much of the LO development and review processes take place offline (e.g. information available via GP surgeries and schools), and our focus on LO websites may not fully capture LO performance. It is possible that we are underestimating or overestimating LA input. Similarly, it was outside of the scope of the study to be able to assess the contribution of other agencies to the LO, and we were not able to reliably assess joint working and cooperation-related criteria. Nevertheless, we do think that our assessments of the available content of the LO websites provide an in-depth and important insight into the functioning of the LO.

CONCLUSION

There is considerable variation in SEND-related information presented on LO websites across England, which contravenes current legislation. Not only are there critical information gaps, but websites often lack accessibility features which reflects a poor understanding about the needs of many service-users and may be exacerbating socio-demographic inequalities. We do not assume that the Local Offer necessarily reflects the quality of SEN provision but argue that there is an urgent need to upgrade and monitor LO websites to ensure all SEND-related information is consistently available and accessible for those who need it. Poor quality or missing information is likely to impede provision that is truly responsive to local needs. Future work is required that seeks to explore how the quality of information that is provided within the local offer relates to the experiences of those trying to navigate the SEND system, the quality of provision and children's outcomes.

ACKNOWLEDGEMENTS

We would like to acknowledge the contribution of the wider HOPE and ECHILD study teams to this work: ECHILD Database support—Vincent Nguyen, Ania Zylbersztejn, Matthew Jay,

Ruth Blackburn; PPIE: Kate Boddy, HOPE Study Advisory groups; clinical input—Stuart Logan, Jugnoo Rahi; programme management—Matthew Lilliman; other members of the HOPE team—Isaac Winterburn.

FUNDING INFORMATION

This research was supported by Health Data Research UK (grant No. LOND1), which is funded by the UK Medical Research Council and eight other funders. Ruth Gilbert and Tamsin Ford are supported by a NIHR senior investigator award. All research at the Department of Psychiatry in the University of Cambridge benefits from the NIHR Cambridge Biomedical Research Centre (NIHR203312) and NIHR Applied Research Collaboration East of England. The views expressed are those of the author(s) and not necessarily those of the NIHR or the Department of Health and Social Care.

CONFLICT OF INTEREST STATEMENT

There are no conflicts of interest to disclose.

DATA AVAILABILITY STATEMENT

Data sharing is not applicable to this article as no new data were created or analysed in this study.

ETHICS STATEMENT

Ethical approval was granted for this study by the Cambridge Psychology Research Ethics Committee (PRE.2021.058).

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SUPPORTING INFORMATION

Additional supporting information can be found online in the Supporting Information section at the end of this article.

How to cite this article: Matthews, J., Black-Hawkins, K., Basu, A., Necula, A-I., Downs, J., Ford, T. & Saxton, J.; (2024). To what extent do England's local offer websites adhere to the statutory guidance as set out in the special educational needs and disabilities code of practice? *British Educational Research Journal*, 00, 1–17. <https://doi.org/10.1002/berj.3996>