

**Royal Borough of Kingston upon Thames  
Safety Valve Agreement**

**Quarter Three 2021/22 Summary Update Report**

<b>Date Submitted</b>	16 December 2021
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<b>Signed off by S151 Officer</b>	Sarah Ireland
<b>Signed off by Director of Children's Services</b>	Ian Dodds
<b>Background documents</b>	<a href="#">Safety Valve Agreement</a> <a href="#">SEND Futures Plan</a>

Consistent progress continues to be made in Kingston on the SEND Futures Plan including the conditions associated with the Safety Valve Agreement. As stated in the risk register (Appendix D) and in more detail below, within the summary report, there have been changes to the level of risk and further mitigating action associated with the SEND Futures Plan implementation. Since the start of the new academic year schools have reported an increase in level and complexity of need and the number of EHCPs is close to the forecast number within the SEND Futures Plan. Additional measures have been introduced to ensure we are managing demand for EHCPs as much as possible through early intervention support and the introduction of a new panel to assess EHC needs assessment requests. It is also important to note alongside the increase in need that there is significant price inflation for placements across SEND education settings regionally, particularly in post-16 provision and also in out of borough placements due to the lack of specialist places. There have been further delays, beyond our control, to the ASC Special Free School that was due to open in September 2023, which now looks likely to open in September 2024.

Despite the increased risk, a good level of confidence remains that the terms and conditions for 2021/22 will be fully met and that this work will support the achievement of conditions associated with future years.

Progress and challenges with the SEND Futures Plan were presented and discussed at Schools Forum in both September and November, and the papers published on the [Schools Forum meeting agenda](#) on the Council's website.

The SEND Partnership Board, which brings partners together to monitor the plan every two months, met most recently in November 2021. The SEND Partnership Board paper provides a detailed update on the five SEND Futures Plan workstreams including progress made, emerging issues and upcoming priorities. The most recent update on progress is attached as appendix C to this report. A summary update on each of the safety valve conditions is included in the table below with further detail on each area in the appendix.

There is a good level of assurance given for all but four areas of the Safety Valve agreement, which is the same as last quarter. We are in a stronger position to assess the absolute assurance of whether all areas of the agreement will be met, however there are some areas that we will have greater certainty of in the final quarter of the year. There continues to be monitoring activity across all conditions and we are confident that progress is being made to ensure that we are continuing to meet all of the conditions within the agreement. There are no low assurance areas meaning **there are no areas where Kingston does not think it will meet the conditions set out in the agreement** at this stage.

Agreement Condition	Assurance Level		
<b>Condition 2: Maximum Forecast DSG Deficit Profile at year end £28.6m</b>	Q1	Q2	Q3
	Good	Good	Good

**Progress update:**

There is a good level of assurance that this target will be met as evidenced within November [Schools Forum reports](#) and appendices A and B.

The current projected deficit on the DSG Fund before safety valve funding is £28.4m compared to the max threshold set of £28.6m. The in year forecast net deficit has worsened due to a reduction in the grant allocation (£207k) to allow for the latest high needs import/export adjustment as well as partial achievement of a number of planned savings in relation to increasing partner contributions, controlling average costs and developing the post 16 offer to increase take up of more affordable options. A focused financial review exercise is planned to assess where this gap can be recouped to support future years spend levels. Kingston is also planning to meet with Impower to explore what additional ideas they may have for improving value for money and where they could offer additional capacity to drive savings.

We are expecting the total number of EHCPs to be close to the estimated level in January 2022; demand management is a critical part of ensuring that the DSG fund is in a more sustainable position, alongside the cost of placements. A multi-agency approach is being taken to ensure that actions are being progressed to manage demand for EHCPs whilst continuing to meet the needs of children and young people within the borough. The work is documented in the SEND Partnership Board update (Appendix C) and further work is summarised in 3.1 and 3.3 below.

The key indicators to note are:

KPI	SVA Target	Q1	Q2	Q3
Max cumulative deficit before safety valve funding	£28,607,000	£27,886,000	£28,260,000	£28,363,000
Max number of EHCPs @Jan census (estimated)	1,537 (+101)	1,550 (+121)	1,537 (+101)	1533 (+97)
Increase in EHCPs @ 30th November 2021		1,447 (+18)	1,470 (+41)	1512 (+83)

<b>Condition 3.1: Improve support available in schools to manage demand more effectively and reduce escalation of need.</b>	Q1	Q2	Q3
	Good	Good	Good

Significant initiatives to upskill the schools workforce continue; key progress items below:

- i. All primary and secondary schools in the borough will be supported by Mental Health Support Teams (MHSTs) in schools from January 2022. With increasing need this coverage will help support CYP at school at the earliest opportunity. A team is being introduced in January who will have a focus on SEND and mental health needs.
- ii. Interventions from the Education Inclusion Support Service (EISS) continue with an alternative curriculum offer for the small numbers of young people for whom a mainstream curriculum is unsuitable and an offer to better support families who are experiencing challenges but do not meet the threshold for Early Help support.

- iii. The Inclusion Charter and Toolkit (previously called Quality First Teaching Inclusion Charter) is developing well and we are now in a position to publicise work ahead of the pilot launch at the beginning of the Spring Term. Headteachers are being consulted prior to the official launch as this charter is to be embedded into everyday working.
- iv. The Ordinarily Available document is to be launched at the start of the Spring Term; the document's purpose is to ensure that schools are aware of the provision that would be expected to be ordinarily available in mainstream schools for all children and young people with special education needs and/or disabilities, aged 4-18 years old.
- v. Early Help Resilience Networks are continuing to be held for the three age groups (0-4, 5-10,11+) every month and signposting to local services has been possible for each family. Impact on referrals into the Early Help service is reviewed against agreed KPIs
- vi. Transitions process and protocol improvements are being launched in Spring 2022 at two transition points, primary to secondary school and secondary to post-16
- vii. The first Children's Centre Partnership group has been held with further meetings scheduled on a quarterly basis. The purpose of the group is to develop a collaborative approach when providing services for children aged 0-5 years old and their families across a range of partners via the Children's Centres.
- viii. First 1001 Days - Work continues with families open to social care where there is a baby under 1 year old to enhance attachment and attunement

<b>Condition 3.2: Expand specialist provision to avoid placements in more expensive Non Maintained Special Schools and independent special schools.</b>	Q1	Q2	Q3
	Good	Good	Good

Progress Update:

- i. Work is on-going with the Department for Education and Ambitious About Autism to open the new special free school, at the Moor Lane site, as been delayed by having to re-tender for a new contractor. Likely opening date is now September 2024.
- ii. Children and young people are benefiting from the increase in local specialist places at Malden Oaks and Dysart and also the specialist resource provision at Alexandra School with an additional 39 spaces created.

£329,000 in cost mitigations have been secured to date compared to the £191,000 target. More places have been created than anticipated when the safety valve agreement was set and the cost of alternative placements in independent or special schools has also increased which increases the cost mitigation per place but has impacted in achievement of savings elsewhere in the plan.

<b>Condition 3.3: Manage demand for Education Health and Care Plans (EHCP) by scrutinising provision at each annual review and continuing to work with consultants Mastodon C to forecast and manage EHCP growth during 2021-22.</b>	Q1	Q2	Q3
	Good	Good	Good

Progress Update:

The total number of EHC plans stands at 1512 at the end of November, representing a 6.4% increase over the past twelve months.

A new multi agency panel has been introduced to assess education, health and care needs assessment requests. This is to ensure the robustness of adherence to statutory duties by all partners and will additionally provide quicker information on emerging trends and the areas of the system that are priorities for additional support. This will provide greater objectivity and confidence that the decision making is in line with the statutory duty as consistently as possible, and will ultimately impact the number of EHC plans that are issued.

In conjunction with the panel a new EHC needs assessment review group has been established due to the increase in EHC need assessment requests and the increasing level and complexity of need within the borough. To give the review group insight into the requests a report is produced monthly that analyses the EHC needs assessment requests in the borough on a month by month and school by school basis, giving detailed information on EHC needs assessment requests. The purpose of the review group is to ensure that relevant and appropriate steps are taken with regards to emerging trends and supporting schools to ensure needs are identified at the earliest opportunity and early advice and intervention is utilised to support and meet the needs of the child or young person with SEND. The review group consists of multi-agency partners who review the data, analyse trends and ensure work towards an action plan is completed; a targeted approach has been developed with the School Improvement Partners team to ensure that additional support can be provided in priority areas, there is a wider service and multi-agency approach to matters that are affecting the increase in EHC need assessment requests.

Between April and November 2021, 23 children and young people with existing EHC plan have arrived to live in Kingston, their ages range from reception to 19+, in addition to this 7 children have arrived in mainstream primary schools with no EHC plan whom we expect to need an EHC plan for their needs to be met. Costs for all of these children and young people are not yet known, however the combined costs of the 14 confirmed placements are £260k per year. The average cost of the 14 known placements is very similar to the average cost of an EHC plan in Kingston, if this transpires to be the same for the further new arrivals, the 30 new arrivals with SEND represent an additional annual cost of £570k.

In addition to the recent Preparing for Adulthood team restructure a redesign of the SEND team has been undertaken to further improve annual review management and the oversight of annual reviews. Annual reviews remain a key priority with AfC and key partners, there has been collaborative working to make improvements to the review process and also provide continued and on-going multi-agency training to all partners. The improvements we have made to the annual review process has had an impact on the cessation of plans and we are confident that this figure will continue to improve until year end and in following years.

KPI	SVA Target	Q1	Q2	Q3	Total YTD
Issued plans	172	18	23	42	83
Ceased plans	72	7	22	13	42
Net increase	+100	+11	+1	+29	+41

<b>Condition 3.4: Improve efficiency of commissioning services to drive down cost.</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>
	Medium	Medium	Medium

Progress Update:

Two SEND Placement Commissioners are in post and are utilising their expertise to review existing commissioning processes and practice, a comparison is being made against best practice from other local authorities with the overall aim of improving local practice. The work of the inhouse team is complemented

via membership of the South London Commissioning Partnership who work on behalf of ten local authorities to negotiate inflationary requests.

The team are in on-going negotiations with education providers, who have been ranked based on value for money and quality, with regards to placement pricing. A prioritisation exercise has been completed taking into account the key areas of focus for commissioning practice, there is a focus on high cost individual placements and large numbers of placements in one setting. Meetings are taking place and have been scheduled with independent special schools and colleges on a prioritised basis with regards to maximising the quality of those placements and their value for money.

AfC's Head of Strategic Commissioning started in early December and a new Associate Director for Business Development and Strategic Commissioning will also be starting in March 2022. These posts will focus on SEND and Social Care procurement and commissioning practice and will review the current team structure to ensure we can maximise capacity, skills and expertise.

£250k in savings/ cost mitigations have been achieved in the financial year compared to the savings/ cost mitigation target of £351k for the full year. The savings have been achieved based on independent negotiating and targeted work with providers and access to the SLCP for inflationary negotiations. The average cost of independent placements has increased from the estimate of £33,313 to £34,208 although significant progress has been made in this area further work is required to support longer term sustainability.

A medium level of assurance has been given as there is a risk that the full target will not be achieved and due to complexity of the post pandemic market, difficulties in negotiating current price placements and the ongoing fee increase requests that exceed normal levels of inflation.

<b>Condition 3.5: Increase contributions from health and social care.</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>
	Medium	Medium	Medium

Progress Update:

Contributions are projected to increase by £300,000 compared to the £599,000 target built into the plan. The current actual increase is £226,000 and represents the funding agreements confirmed and made to date. The remaining £74,000 is the anticipated figure for future demand (the number of EHCPs expected between November 2021 to March 2022).

Of note is that the process around how costs relating to placements including at least two of education, health and care are split has recently been reconsidered and improved via a review of the role and practice of the Joint Agency Panel, and there is confidence therefore that this mismatch between target and actual is a function of the needs of the individual children involved. This will be an area of focus over the coming months as placements and associated funding is agreed for the new academic year. A clearer framework and more proactive agreements have been introduced and this should support improvement before the year end.

<b>Partner</b>	<b>Actual Increase in contribution relative to 2020/21 Q1</b>	<b>Actual Increase in contribution relative to 2020/21 Q2</b>	<b>Actual Increase in contribution relative to 2020/21 Q3</b>
Children's social care	-£111k	-£31k	+79k
Adult social care	-£75k	-£1k	-3k

Children's health	-£43k	-£11k	-31k
Adults health	+£69k	+£75k	+181k
<b>Total</b>	<b>-£160k</b>	<b>+£32k</b>	<b>+£226k</b>

<b>Condition 3.6: Commission a Local Government Association (LGA) peer review and implement any recommendations arising from it which drive sustainability in their high needs system.</b>	Q1	Q2	Q3
	Good	Good	Good

Progress Update:

The Schools Forum High Needs Block Sub Group has been established and held its first meeting on 4th October 2021; this meeting was valuable and will help shape the future of the spend in the High Needs Block. The latest Safety Valve funding report and the banding system that is used with regards to top-up funding for individual children with an education, health and care plan were discussed. Recommendations for alternative provision funding and principles of targeted high needs funding were also covered.

A Parent Carer Engagement Officer has been appointed and started in post in December; they will be responsible for developing closer working relationships with families that will ensure that parents and carers of children and young people with SEND are fully involved in the SEND Futures Plan. Wider findings of the review will be incorporated in the next iteration of the SEND Futures Plan.

<b>Condition 3.7: Reforming of the authority's post-16 offer, including but not limited to development of new provision.</b>	Q1	Q2	Q3
	Good	Medium	Medium

Progress Update:

This condition is being progressed as part of Workstream 3 'Local Provision'.

Progress has been made to establish a Orchard Hill College Academy Trust post-16 campus: consultations with parents/carers and children and young people have taken place, and internal approvals have been obtained. LocatEd are working to identify and secure a suitable site in Kingston or Surbiton. A grant/commissioning agreement is being prepared, which will include key performance indicators relating to placement cost reductions.

Delivery work of phase 2 of the post-16 SEMH provision at Malden Oaks is on-going to support the admission of a second cohort in 2022.

The Kickstart programme has been extended to March 2022 and the Next Steps programme for 2021/22 has commenced currently prioritising post-16 pathway plans and phase transfer for year 11 reviews.

An increase has been seen by a range of professionals in applications for engagement programmes; these target specific groups of young people, including those with Social Emotional and Mental Health (SEMH) needs and Physical Disabilities

A pilot of a NEET (not in education, employment or training) transition project took place during the summer with young people with mental health needs, hoping to progress to a supported internship placement. The project was a success and all of the young people that completed the pilot currently remain on the internship.

The average cost of post 16 placements has actually increased this year and we have not achieved most of the

£120,000 target. Average costs have increased across all placement types and particularly in independent specialist placements as shown on the dashboard in appendix A. The team will be reviewing what further action can be taken to mitigate future costs for this growing older cohort and will also be assessing the longer term impact of Covid 19 on more affordable placement options e.g. apprenticeships. We also plan to meet with Impower in the new year to explore whether there are any solutions that have worked well in other LAs that could support this as well as the wider SEND Futures Plan.

<b>Condition 3.8: Contribute to the reduction of the cumulative deficit via alternative council funding sources in each financial year covered by this agreement.</b>	Q1	Q2	Q3
	Good	Good	Good

Progress Update:

An additional £201,000 was received as a block transfer for the Early Intervention Outreach offer and this is in addition to the £462,000 in block transfers agreed as part of DSG budget setting process.

The general fund contribution totalling £1,200,000 was also agreed this year and has been built into budget projections next year.

The Schools Forum met in September and November following an autumn consultation to consider the prioritisation of education funding for the 2022/23 budget.

<b>Capital: Progress on capital investment and associated local infrastructure growth</b>	Q1	Q2	Q3
	Good	Medium	Medium

Good progress continues to be made towards establishing a new post-16 SEND centre in the borough which would provide, on one campus, a second site for the sixth forms of the three Orchard Hill special schools (Bedelsford, Dysart and St Philip's) plus the re-location of Orchard Hill College's local centre, currently based in New Malden. This would provide up to 80 new post- and pre-16 places in the borough. The granting of £3.6m to support this project, plus a substantial portion of the borough's HNC allocation, will make this deliverable, subject to formal Council sign-off and the securing of a suitable site.

The ESFA's progress towards delivering the special free school, to be run by Ambitious about Autism, in Chessington, has been delayed by having to re-tender for a new contractor, which has put the proposed opening date of September 2023 at high risk of not being achievable. September 2024 now looks the likeliest opening date, which would be six years since our original application.

The SEND Futures Plan update report identifies a number of emerging risks. Risks are monitored by the Director of Children's Services and his team and where needed associated mitigating actions are identified and implemented. Appendix D provides the SEND Futures Plan risk register for information. None of the risks are likely to compromise progress on the SEND Futures Plan in the short term. It is important that the following risks continue to be carefully monitored, noting also that the risk register contains an increase in the number of risks considered to be moderate or high compared to last quarter:

- The continued above inflation requests by providers and schools to increase fees and top ups for pressures they are experiencing including challenging funding settlements, increasing

salary costs, increasing supplier costs, energy costs, recruitment difficulties, increases in complexity.

- The lack of available specialist places within the borough and regionally is resulting in higher cost of out of borough placements being selected as appropriate provision for children and young people. The lack of specialist places in surrounding boroughs is also increasing the price of placements and therefore increasing overall spend. Joint working with the DfE and new providers for capital schemes for specialist places will make a significant difference in this area.
- The significant increase in need and complexity of need and the number of requests for EHC needs assessments with a view to receiving a EHC plan from schools since returning in September. The impact of COVID on increasing need is being realised but the true impact is still unknown. Workstream 4 and 5 action plans will cover all the key actions that need to be taken to ensure that we are closely monitoring the level of needs and issuance of EHC Plans.

Regarding requests for additional support from the DfE to help Kingston meet its objectives:

- The opening date for the new local special free school for autism at Moor Lane looks like it is extremely likely to be delayed until September 2024. Anything that could be done to help speed this process would be appreciated, as delays will have a negative financial impact.
- Uncertainty exists about the future operation of the South London SEN Commissioning Partnership. The DfE's views / support in considering Pan London and / or regional South East England commissioning partnerships would be welcome at a time when a regional shortage of specialist places is driving significant price inflation and creating probably the biggest threat to meeting the terms of the Safety Valve Agreement
- We continue to hear of cases where health professionals have discussed EHC needs assessments / plans and / or particular school placements with families in a way that is not always in line with the statutory process / SEND Code of Practice. We would ask that the DfE works with NHS England colleagues to ensure such conversations are conducted in line with formal processes so as to make the experience of families as joined up and understandable as possible.

### **Summary of appendices**

Appendix A - Demand and Financial Management Dataset

Appendix B - SEND Futures Plan Budget Monitoring

Appendix C - SEND Futures Workstream Update

Appendix D - Risk Register

### **Key contact**

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KINGSTON DEMAND AND FINANCE DASHBOARD

Appendix A

Ref	Key Performance Indicator	Baseline 31st March 2021	Target 21/22	Q1	Q2	Q3	RAG	Comment	Target Derivation	KPI Category
1	Actual EHCPs	1429	1496	1447	1470	1512	G	actual @ Nov, Target pro rata	Pro rata	Demand Management
2	% increase in EHCPs	6.72%	4.67%	1.26%	2.87%	5.81%	G	actual @ Nov, Target pro rata	Pro rata	Demand Management
3	Net EHCPs @ Jan Projected	1436	1537	1550	1537	1533	G	Projected @Jan census	Annual - In Plan	Demand Management
4	% increase	9.29%	7.00%	7.94%	7.03%	6.75%	G		Annual - In Plan	Demand Management
5	New EHCPs	27	172	24	52	101	G	actual @ Nov, Target annual	Annual - In Plan	Demand Management
6	Ceased EHCPs	-41	-72	-7	-22	-35	A	actual @ Nov, Target annual	Annual - In Plan	Demand Management
6a	Movers	n/a	n/a	1	11	1	G	actual @ Nov, Target annual	Annual	Demand Management
7	% of EHCP per head of population	2.20%	2.20%	2.25%	2.73%	2.80%	A	updated population estimates used in Q3	Annual	Demand management
8	% of pupils with SEN Support	9.40%	9.40%	9.40%	9.90%	9.90%	A	updated population estimates used in Q3	Annual	Demand management
9	HNB Surplus / Deficit	£6,564,065	£5,432,000	£5,120,000	£5,704,626	£5,847,751	R	Reduction in budget for export adjustment has impacted in year position. Spend also being driven by challenging average cost of placements.	Annual - In Plan	Financial Control
10	HNB Spend	£30,270,400	£31,791,000	£31,680,146	£32,057,326	£32,200,451	A	£201K increase is matched by an additional schools block transfer agreed for additional Education Outreach Services.	Annual - In Plan	Financial Control
11	HNB Spend - direct (includes recoupment and future demand)	£28,793,720	£29,912,412	£29,813,462	£30,230,169	£30,336,298	A		Annual	Financial Control
12	HNB Spend - central	£1,476,680	£1,878,588	£1,866,684	£1,827,157	£1,864,153	G		Annual	Financial Control
13	In Year DSG Surplus/Deficit	£5,149,967	£3,482,000	£3,485,000	£3,859,000	£3,962,000	A		Annual - In Plan	Financial Control
14	Cumulative DSG Surplus/Deficit - before safety valve funding	£24,401,000	£28,607,000	£27,886,000	£28,260,000	£28,363,000	G		Annual - In Plan	Financial Control
15	Cumulative DSG Surplus/Deficit - after safety valve funding	£12,401,000	£11,607,000	£10,886,000	£11,260,000	£11,363,000	G		Annual	Financial Control
16	Funding gap as % of HNB allocation	-30.09%	-22.76%	-22.33%	-24.79%	-25.34%	R	Impacted by high average costs and drop in grant funding relative to budget	Annual	Financial Control
17	Early Years outturn	-£871,000	-£750,000	-£436,000	-£436,000	-£470,000	A		Annual - In Plan	Financial Control
18	HNB DSG allocation	£23,268,514	£25,897,000	£25,896,881	£25,689,881	£25,689,881	R	Reduction due to import/export adjustment	Annual - In Plan	Financial Control
19	Block transfers	£437,800	£462,000	£662,800	£662,800	£662,800	G		Annual - In Plan	Financial Control
20	General Fund	£0	£1,200,000	£1,200,000	£1,200,000	£1,200,000	G		Annual - In Plan	Financial Control
21	Savings / mitigation < 16 HNB only	n/a	£666,000	£309,967	£424,388	£604,372	A		Annual - In Plan	Financial Control
22	Savings / mitigation > 16 HNB only	n/a	£595,000	£217,459	£309,851	£243,948	A		Annual - In Plan	Financial Control
23	Average cost - all HNB 2 - 18	789	841	838	848	852	A		Annual	Value for Money
24	Savings / mitigation - HNB only	n/a	£1,261,000	£527,426	£734,239	£848,320	A		Annual - In Plan	Value for Money
25	Average placement cost < 16s	£18,778	£16,483	£16,797	£16,928	£16,342	G		Annual	Value for Money
26	Average placement cost > 16s	£13,206	£11,877	£11,778	£13,226	£13,638	R		Annual	Value for Money
27	Average cost of an independent < 16	£38,140	£33,313	£33,657	£30,443	£34,208	R	Reduction in projected independent placement numbers - drop from 176 (including future demand) in Q2 to 156 (including future demand) in Q3.	Annual	Value for Money
28	Average cost of maintained / academy special school - in borough	£29,683	£28,650	£28,547	£29,324	£29,008	A		Annual	Value for Money
29	Average cost of maintained / academy special school - out borough	£30,204	£27,473	£29,189	£30,665	£30,035	R	Mix of inflation and increased complexity of needs	Annual	Value for Money
30	Average cost of an independent > 16	£32,658	£34,051	£33,837	£35,024	£37,096	R	A number of lower cost placements have ceased. The number of placements has overall remained the same between Q2 and Q3 (both 43).	Annual	Value for Money
31	Average cost of FE colleges > 16	£2,495	£2,711	£2,691	£3,466	£2,806	A	A number of lower cost placements have ceased. This average is likely to reduce as the academic year progresses.	Annual	Value for Money
32	Average cost of ISP > 16	£39,088	£29,202	£29,172	£34,266	£36,916	R	A number of lower cost placements have ceased. This average is likely to reduce as the academic year progresses.	Annual	Value for Money
33	Average cost of in borough special school > 16	£30,606	£24,949	£24,766	£25,272	£27,567	R		Annual	Value for Money
34	Average placement cost - alternative provision	£17,695	£17,171	£16,768	£16,768	£16,768	G		Annual	Value for Money
35	Savings / mitigation - alternative provision	£133,000	£0	£0	£0	£0	G		Annual	Value for Money
36	Annual Review Savings / mitigation all age	n/a	n/a	n/a	n/a	n/a			Annual	Value for Money
37	Average cost of an Education, Health and Care Plan (EHCP)	£21,183	£20,684	£20,009	£20,388	£20,376	G		Annual - In Plan	Value for Money
38	% of spend in: the independent, non-maintained special school and independent college sector	28.45%	26.60%	26.37%	27.81%	28.02%	A		Annual	Value for Money

## KINGSTON FINANCIAL MODEL MONITORING

		2021/22			
KINGSTON FINANCIAL MODEL	Financial Model	Actual Q3	Variance	RAG	
	£m	£m	£m		
HNB allocation	25.897	25.690	-0.207	A	
Budget additions (transfers)	0.462	0.663	0.201	G	
<b>Total budget</b>	<b>26.359</b>	<b>26.353</b>	<b>-0.006</b>	<b>G</b>	
<b>HNB expenditure before savings</b>	<b>33.052</b>	<b>33.049</b>	<b>-0.003</b>	<b>G</b>	
Increased places in Specialist Resource Provisions (SRP)	-0.071	-0.138	-0.067	G	
Review of SRP vacant place funding	-0.073	-0.033	0.040	G	
Increased special school places	-0.047	-0.159	-0.112	G	
Development of post 16 offer	-0.120	0.031	0.151	A	
Improved commissioning practice including annual reviews	-0.351	-0.250	0.101	A	
Contributions from other partners (health & social care)	-0.599	-0.300	0.299	A	
<b>HNB expenditure after savings</b>	<b>31.791</b>	<b>32.201</b>	<b>0.410</b>	<b>G</b>	
<b>Net HNB deficit</b>	<b>5.432</b>	<b>5.848</b>	<b>0.416</b>	<b>A</b>	
Variance in other DSG blocks	-0.750	-0.686	0.064	A	
General Fund Contribution	-1.200	-1.200	0.000	G	
<b>Net DSG Deficit (incl GF contrn)</b>	<b>3.482</b>	<b>3.962</b>	<b>0.480</b>	<b>A</b>	
<b>Net DSG deficit - cumulative before safety valve</b>	<b>28.607</b>	<b>28.363</b>	<b>-0.244</b>	<b>G</b>	
<b>Net DSG deficit - cumulative after max safety valve</b>	<b>11.607</b>	<b>11.363</b>	<b>-0.244</b>	<b>G</b>	

## SEND Futures Plan Update

### 1. Introduction

- a. Under the terms of the Council's "Safety Valve" Agreement, the Council is required to report quarterly to the Department for Education (DfE) on performance against terms in the agreement. In September the council submitted their second quarterly report ([available here with the papers for November's School Forum](#)), and as a result of the performance described the Safety Valve funding was received for the second quarter of 2021/22. The quality of Kingston's reporting has been complemented by the DfE and has been shared with other Local Authorities as best practice. The Council will report to the DfE again in December in relation to the potential Q3 payment and these detailed financial reports will be shared with the Board at the meeting in January.
- b. As reported in September, it is important to note the increase in requests for education health and care needs assessments in Kingston and the amount and complexity of need that is being reported in schools since their return in September. The total number of education, health and care plans (EHCs) is very close to the number that was forecast in the Safety Valve Agreement. It is also important to note that there is significant price inflation for placements across SEND education settings, particularly in Post-16. The average age of a child or young person (CYP) who has an EHC plan is going up and there is now a large percentage of total plans at Post-16. The placement price increase alongside the significant increase in need following the return of CYP to education settings in September presents budgetary pressures with regards to the Safety Valve funding agreement which needs to be closely monitored.
- c. The Ofsted / CQC inspection revisit following the original Local Area SEND Inspection of September 2018 has not yet materialised, and is expected sometime in this academic year.
- d. [The Government has set up a steering group](#) to deliver on its SEND review. It met for the first time on 28th September. The group will work to deliver proposals with the purpose to improve outcomes for children and young people with SEND, to improve the experiences of their parents and carers, and to deliver reforms that will bring financial sustainability to the SEND system.
- e. The Schools Forum High Needs Block Sub Group has been established and held its first meeting on 4th October 2021 ([notes available here with the papers for November's School Forum](#)); this meeting was valuable and the input from the volunteers is greatly appreciated and will help shape the future of the spend in the High Needs Block. The latest Safety Valve funding report and the banding system that is used with regards to top-up funding for individual children with an education, health and care plan were discussed. Recommendations for alternative provision funding and principles of targeted high needs funding were also covered.

### 2. Workstream 1: Co-production, engagement and participation

#### a. Children and Young People (CYP)

##### Impact and progress

- i. The Young Person Recruits Crews has been involved in the appointment of one occupational therapist, one art therapist, one family therapist, two assistant psychologists and three short breaks sessional workers; two of these panels were held face to face. One new young person became a member and received training to be part of the recruits crew
- ii. SEND Participation Members shared their views to inform the Kingston Local Plan.
- iii. There was consultation with SEND participation members who reviewed the proposed 'Inclusion Charter' and an amended version of the charter was presented at the core group. Young people's

comments brought about a discussion regarding language and the resources were re-named as a result of this. Members also critiqued vocational profiles; their views will influence the creation of a local version.

- iv. First face to face members monthly meeting was held in October 2021 since February 2020.
- v. 37 Kingston Special Schools pupils took part in focus groups to help inform the Post-16 Campus.

#### **Strategic work**

- i. A presentation given at 'Your Healthcare' Service Day with discussions around ongoing development work
- ii. Participation Leads Meetings with Integrated Service for Children with Disabilities and the SEN team

#### **Areas of concern**

- i. To improve the accessibility of information provided by professionals access to software to support production of Easy Read materials is required. There is currently restricted access to Boardmaker symbol software and work is ongoing to widen access and deliver training.
- ii. The Mental Capacity Act covers consent at 13+ years old and change at 16 years old regarding decision-making. These are regularly raised as areas where there is uncertainty and/or anxiety around for workers and training is required.
- iii. Capacity remains a challenge; a training session was postponed in October due to time constraints. Service development work including promotion and recruitment of new members is slow and this is due to urgent work and tight deadlines. Lack of promotion and recruitment could lead to low levels of engagement and impact quality of work. Time is required to support current members, reach out to, recruit and develop new ones whilst evaluating and developing the service. The demand remains high, which is a positive.
- iv. Embedding participation within teams and services needs to be consistent across the service and is reliant on passionate people. Key Performance Indicators or equivalent need to be developed to ensure it is being carried out.

#### **Priorities and milestones for coming months**

- i. Development of the action plan for Young People's feedback especially of the Post-16 consultation
- ii. Resolve Boardmaker issue and ensure staff who need it have access to the software
- iii. Complete outstanding development work around information and surveys for CYP
- iv. Agreement around young people's involvement in Workstream 1 meetings and work is to be finalised

#### **b. Parents and Carers**

- i. An appointment has been made for the new role of "Parent Carer Engagement Officer" (18 hours per week) with commencement in post in December
- ii. The Parent Carer Forum launch event date has been changed to the Sunday 27th March 2022 in Chessington (this was originally planned for March 2020 but was delayed due to the pandemic). Services supporting SEND in Kingston will be present.
- iii. Six areas of co-production agreed with the Parent Carer Forum now have agreed leads from either Achieving for Children or the Clinical Commissioning Group to ensure that there is collaborative working across all workstreams. Bi-monthly meetings with PCF Chair, AfC and CCG will include

monitoring progress with co-producing service improvement.

- iv. Notes and actions of recent Parent and Carers consortium meetings. There has been a particular focus on assessed need and non-assessed need short breaks provision and continuing health care including discussions on the Integrated Care System.
- v. The Local Offer website has been refreshed and has taken into account feedback from users. Accessibility has been improved through several features including simplification of layout and design, a refresh of colours in line with required standards and an improved accessibility tool button. Monthly meetings to be reestablished with the PCF to review the website.

### **3. Workstream 2: Joint Commissioning**

#### **Impact and Progress over past 3 months**

- a. Two SEND Placement Commissioners are ensuring progress with improving the quality and value for money of SEND placements. These roles are fundamental in the negotiation of reducing above inflation price increases and laying the foundations of the permanent commissioning team. They started work at the beginning of October and good progress is being made with their objectives. Key progress is detailed below:
  - i. There has been a prioritisation exercise completed with regards to the key areas of focus for commissioning practice. Education providers have been triaged/ ranked based on cost of individual placements (where very high cost placements exist) and a large number of placements (where there are a large number of lower cost placements). Meetings have begun with independent special schools and colleges on a prioritised basis, with regards to maximising the quality of those placements and their value for money.
  - ii. These negotiations include linking the support delivered by providers to the achievement of specific outcomes in education, health and care (EHC) plans i.e. greater transparency of their impact.
  - iii. A review of existing commissioning processes and practice is being carried out and comparisons being made against best practice identified in other local authorities, including contract management, with the aim of improving local practice. In addition to this, work has started on updating and reviewing the commissioner (internal) and provider (external) handbooks; these handbooks will encompass best practice and help align commissioning practice across the borough bringing greater standardisation.
  - iv. Areas identified as offering potential for improvements include the opportunities for greater standardisation of process to allow more delegation of decision making, improved systems to allow more centralisation and sharing of information (including financial), consistency of SEN casework, and linkage of needs information to SEND placement sufficiency planning.
  - v. This review will also inform the structure and recruitment of the permanent commissioning team, due to relaunch in early 2022.

#### **Priorities and milestones for next three months**

- i. Complete review of commissioning procedures and processes and produce commissioner and provider handbooks. The handbooks will include best practice and guidance on the purpose of SEND commissioning, value for money, quality assurance, contractual arrangements, contract review process, post-16 curriculum planning and step down process for special independent settings.
- ii. Finalise details for the recruitment of the permanent placement commissioning team. This process will start in early 2022.

- iii. Post 16 curriculum planning reviewed with a focus on special independent providers.
- iv. A data dashboard of providers to be created to summarise providers' performance to identify more focussed commissioning work and allow ongoing "real time" assessment.

**b. Therapies and emotional wellbeing and mental health**

- i. Matters relating to therapy provision and emotional wellbeing and mental health are included under Workstream 3, with the latter subject to a separate agenda item at this meeting.

**c. Short Breaks Commissioning**

- i. The procurement pathway for short breaks recommissioning was considered by Kingston's People Committee on 9th November. The tender process which closed on the 15th November includes consideration of how suppliers can/ will be able to respond to the wishes of families.
- ii. Evaluations are to take place throughout November and early December with a view to issuing contracts prior to March 2022.

**d. Special Educational Needs & Disabilities Information Advice and Support Service (SENDIASS)**

- i. It was agreed by the Joint Strategic Commissioning Board and with the Parent Carer Forum (PCF) to extend the current contract until March 2023 allowing sufficient time to co-produce the new arrangements to a high standard. The indicative timeline includes launching engagement and consultation with the parent and carers by Easter 2022, agreeing a draft new service specification by June 2022, issuing invitations to tender in September 2022 and the new contract(s) being awarded in January 2023 to start 1st April 2023.

**4. Workstream 3: Local provision**

**a. Therapies**

- i. The service specifications for physiotherapy, occupational therapy and speech and language therapy services were signed off at the Therapies Oversight Group meeting on the 27th of September.
- ii. A briefing note is being prepared that will set out the original level of investment and staffing capacity requested as part of the initial business case developed in response to the therapies review findings, in comparison to the level of investment and additional staffing. This is to clarify realistic expectations about what can be delivered in terms of the Balanced System at this stage.
- iii. A timeline is being developed to explain the journey towards the Balanced System which will be shared with parents, carers and schools. The intention is to increase understanding about what the new system will look like and timescales for fully delivering the model.
- iv. A meeting has been held with representatives from the PCF to begin work in relation to outcome measures and Key Performance Indicators (KPIs). KPIs will be developed in collaboration with the CCG, providers, the PCF and children and young People. As a result of the meeting, we will be distinguishing between service data indicators (i.e. caseloads, number of referrals, waiting lists) and outcome data that sets out how each therapy service is performing. We will refine the service data indicators with the providers following feedback received from the PCFs.
- v. Pre and post diagnostic support team: parent groups have commenced at Moor Lane by invitation, and all staff now trained to deliver Early Bird Programme which is a National Autistic Society programme. The programme aims to support parents in the period between diagnosis and school placement,

empowering and helping them facilitate their child's social communication and appropriate behaviour in their natural environment.

**b. Emotional wellbeing and mental health**

- i. The final meeting of the task and finish group considering current provision across all tiers of support in South West London took place in early November and its work is now complete.
- ii. A 3-6 month action plan is now in place to redesign the CAMHS SPA, improve communication for preventative work and the universal offer, prioritise plans to implement the iThrive model and adopt good practice in waiting list management.
- iii. iThrive workshops have been scheduled to ensure full understanding of the system by the relevant stakeholders and partners with launch events planned for December 2021
- iv. A project plan has been drafted to support delivery of this high priority work, setting out key workstreams, project leads, and timescales. The workstreams are: planning the implementation of the iThrive model; improving referral pathways; strengthening preventative services; developing the emotional health hub; and addressing service delivery/ demand pressure issues. The governance and oversight of the project plan is currently being finalised.

**c. Local Places**

- i. Children and young people are now benefiting from the increase in local specialist places at Malden Oaks and Dysart and also the specialist resource provision at Alexandra School.
- ii. Work is on-going with the Department for Education and Ambitious About Autism to open the new special free school at the Moor Lane site, planning application due to be submitted to the DfE late autumn, for a 2023 opening.
- iii. Re. the Post-16 Campus being planned with Orchard Hill College Academy Trust, initial consultations have taken place with parents and carers and children and young people and approvals obtained.
- iv. The delivery work of phase 2 of the post-16 social emotional and mental health provision at Malden Oaks is on-going, due to open in 2022.

**d. 16 to 25 Years**

- i. The Next Steps programme for 2021/22 has commenced, advisors are currently prioritising year 11 reviews to discuss post 16 pathway plans and phase transfer. Next Steps is now delivered as an integral part of EHC Plan annual reviews in Years 9 and 11 and offered as a one-to-one interview to EHC plan and SEN Support learners in Year 10. Delivery in Q2 Kingston = 9 learners with EHCPs and 19 SEN Support. Taking into account the baseline of 180, to date, the cumulative percentage of Next Steps interviews delivered to SEND learners by the end of Year 11 is 27%.
- ii. Vocational pathways: At the end of quarter 2, 9% of young people with EHCPs (post-16) are in vocational pathway destinations (38 out of 431 young people with EHCPs (post-16)).
- iii. The Kickstart Programme has been Extended to March 2022. In AfC, the first Kickstart employee that was recruited internally with an EHCP has now been offered an apprenticeship.
- iv. An increase has been seen by a range of professionals in applications for engagement programmes being delivered by AfC. These target specific groups of young people, including those with Social Emotional and Mental Health (SEMH) needs and Physical Disabilities



- v. A pilot of a NEET (not in education, employment or training) transition project took place during the summer with four young people with mental health needs, hoping to progress to a supported internship placement. The project was a success and all four currently remain on the internship.

**e. Concerns**

- i. There is a lack of specialist SEND places in the borough, neighbouring boroughs and the independent sectors, and therefore difficulty in securing appropriate provision for a number of children and young people with more complex needs. Higher than usual number of in-year admissions requiring specialist provision.
- ii. Recruitment of therapists in Kingston remains an issue and there is a national shortage.
- iii. Timescales for opening new schools may be delayed causing there not to be sufficient local specialist places.
- iv. The complexity of the iThrive plans and the time they will take to deliver and see benefits
- v. Lower uptake across South London of Year 11 students in FE Colleges (need to closely monitor NEET and not known figures)

**f. Priorities and milestones for next three months**

- i. Therapies' KPIs are to be agreed and signed off by the Therapies Oversight Group
- ii. A short term plan is to be established for Severe Learning Difficulties at primary phase for April 2022
- iii. iThrive model is to be scoped with all partners
- iv. Ensure statutory functions are delivered whilst immediate capacity challenges are addressed. Plan has been put into place with Your Healthcare and is to be closely monitored. Work is ongoing to ensure statutory provision can be delivered in spite of these workforce challenges.

**5. Workstream 4: Early intervention and transitions**

**a. Recent impact and progress**

Significant initiatives to upskill the wider workforce continue; key progress items below:

- i. The Inclusion Charter and Toolkit (previously called Quality First Teaching Inclusion Charter) is developing well and we are now in a position to publicise work ahead of the pilot launch at the beginning of the Spring Term. Headteachers are being consulted prior to the official launch.
- ii. The Ordinarily Available document is now with PCF members for review and is aimed to be launched at the start of the Spring Term. Young people have reviewed the document already and an accessible easy-read version is being created.
- iii. Interventions from the Education Inclusion Support Service (EISS) continue with an alternative curriculum offer for the small numbers of young people for whom a mainstream curriculum is unsuitable and an offer to better support families who are experiencing challenges but do not meet the threshold for Early Help support.
- iv. Early Help Resilience Networks continue and the Early Help Strategic Board has agreed on a data set and KPIs to review impact on referrals into the Early Help service

- v. Transitions process and protocol improvements at both primary to secondary school and secondary to post-16

**b. First 1,001 Days**

**c. Areas of concern**

- i. As per the previous Board meeting, these relate to the growing number of emotionally related school avoidance (ERSA) cases being referred for medical provision (too many of which become “entrenched”) and in turn becoming EHC needs assessment requests. Similarly the increase in adolescent referrals in the Early Help Service presenting with challenging behaviour and mental health concerns.

**d. Priorities and Milestones**

- i. Develop and run an alternative curriculum for year 7-8
- ii. Finalise the draft Inclusion Charter and Toolkit to be launched in the academic year.
- iii. The transitions working group are to finalise a transition framework which will include the revised transition form for schools to use which will be more accessible and simplified
- iv. Establish a clear strategy with health for supporting entrenched ERSA cases
- v. Finalise the standard and accessible Ordinarily Available documents
- vi. Submit business cases for alternative pathways for consideration in November’s School Forum

**6. Workstream 5: Assessment and planning**

**a. Recent impact and progress**

- i. Joint working across the system has continued to embed quality assurance processes within individual services and ensure learning from bimonthly quality meetings are taken on by individual services for education, health and care plans and annual reviews. Schools are now joining the multiagency quality assurance team and participating in training to support this. A number of schools have agreed and confirmed they would buy in to Person Centred Review Training.
- ii. The EHCP workshop sessions have been attended by EHC Co-ordinators; this has shown an increased level of confidence in the team and improved quality improvements in targeted areas.
- iii. Deep dive reviews into SEND service areas have been completed and there have been areas highlighted for multi agency and service specific training to ensure better consistency across the service.
- iv. The schools quality assurance team have now received their training and will start to undertake quality assurance work.
- v. EHC Needs Assessments multi-agency review group established to focus on the increased requests.
- vi. A new multi agency panel has been introduced to assess education, health and care needs assessment requests. This is to ensure the robustness of adherence to statutory duties by all partners and will additionally provide quicker information on emerging trends and the areas of the system that are priorities for additional support.

- vii. There has been a redesign of the SEND team to ensure that it is effective and efficient specifically surrounding the management of annual reviews
- viii. Outcomes training has been delivered to professionals to ensure that outcomes that are written are person centred and holistic; impact on this is to be confirmed

**b. Areas of concern**

- i. Further work is needed in all service areas to upskill knowledge and understanding of the role and quality of statutory advice in relation to EHC activity.
- ii. The SEND team has a number of new team members, some of whom are still in the process of “getting up to speed” with knowledge and local processes.
- iii. Challenges with the delivery of provision, especially therapies.
- iv. Annual reviews from providers in educational settings are sometimes late and therefore are impacting on statutory timeframes and KPIs. More collaborative working with these providers is needed to ensure that information is provided on time

**c. Priorities and milestones for next three months**

- i. Agree the specification and confirm Helen Sanderson, Person Centred Review Training and develop the roll out for next year
- ii. Further training with teams on compliance and how that applies to specific service areas is to be conducted
- iii. Focus on quality assurance of EHC Plan activities through increased school involvement
- iv. Development of the Annual Review Quality Assurance tool

**d. Number of education, health and care plans**

- i. The total number of Education Health and Care plans maintained by Kingston on 15th November stood at 1498. This is an increase of 77 plans over the previous 12 months, or 5.4%. The latest national data for the increase in Education Health and Care plans is for calendar year 2020 when the number of plans increased by 10.4% in England and 9.6% across London boroughs.

**7. Finance update**

- i. The Borough is currently projecting a Dedicated Schools Grant (DSG) overspend of £5.1m, including £0.25m spend relating to EHC plans that have not yet been approved but are expected to be approved before the end of the financial year. Assuming the Council is successful in claiming £5m in “Safety Valve” funding this year, and including a contribution of £1.2m from the Council, this would result in a £11.3m cumulative DSG overspend at the end of this financial year. This position is summarised below (note the budgets in this table exclude the £67.1m Schools Block and £5.55m High Needs Block Academy Recoupments). Note this forecast cumulative DSG overspend is higher than was forecast in September.

2021/22 DSG Outturn	Budget £m	Outturn £m	Variance £m	Future Demand £m	Variance incl Future Demand £m	Previous Forum £m
Schools Block	50.403	50.188	(0.215)	0.000	(0.215)	(0.210)
Central School Services Block	1.128	1.128	(0.000)	0.000	(0.000)	(0.000)
Early Years Block	13.651	13.188	(0.462)	0.000	(0.462)	(0.436)
High Needs Block	20.804	26.305	5.501	0.250	5.751	5.688
<b>Sub-Total</b>	<b>85.986</b>	<b>90.809</b>	<b>4.824</b>	<b>0.250</b>	<b>5.074</b>	<b>5.042</b>
2020/21 Carry forward	(12.401)	0.000	12.401	0.000	12.401	12.401
Safety Valve Funding	5.000	0.000	(5.000)	0.000	(5.000)	(5.000)
Council Funding	1.200	0.000	(1.200)	0.000	(1.200)	(1.200)
<b>Total</b>	<b>79.785</b>	<b>90.809</b>	<b>11.025</b>	<b>0.250</b>	<b>11.275</b>	<b>11.243</b>

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## SEND FUTURES PLAN RISK REGISTER - NOVEMBER 21

Risks	Impact	Strategy	Actions	Risk Score
<b>Partnership Board</b>				
Lack of partner engagement and shared ownership of the plan with resultant lack of investment	There is no or limited traction in delivering the system change and behaviours that are necessary to transform services and achieve better outcomes for children and young people with SEND within the financial resources available.	Mitigate	Provide strong leadership of the SEND Partnership Board. Maintain current engagement from all key partner agencies to the vision, shared values and key activities. Obtain support from the Health and Wellbeing Board. Maintain the current schedule of regular meetings and reporting to share progress and achievements.	High
Ineffective governance of the SEND Partnership Board and workstreams.	There is a lack of focus and pace in delivering activities, and drift and delay in decision making. There is duplication and mixed messaging from partnership boards and other organisations working in this arena, including the Health and Wellbeing Board, SEND Partnership Board Schools Forum.	Mitigate	Strengthen governance structures that are all clearly understood and adhered to by all stakeholders. Ensure there is effective stakeholder representation on the SEND Partnership Board and five workstreams. Deliver a detailed communications plan.	Moderate
Lack of capacity and capability to drive and deliver transformation.	Key activities in the plan cannot be delivered within the timescales necessary. Partner organisations, parents and carers lose faith in	Mitigate	Sufficient resources from all partner organisations are allocated to deliver the activities in the plan. There is	High

	their ability to achieve system change.		strong senior leadership of the five workstreams. There is a programme to upskill the workforce to deliver the plan. Additional resources and expertise are sourced externally where this is required.	
Lack of agreement on how DSG funding is shared between different blocks.	There is a significant financial gap in the plan which will need to be met from other activities.	Mitigate	Build consensus across the whole system for how DSG funding should be shared. Continue discussions with the Department for Education on the national DSG funding formula. Contingency plans are established to allocate the funding shortfall to other actions within the plan.	High
The impact of the COVID pandemic	The delivery of SEND services and progress of children and young people with SEND are impacted by a range of consequences including the redeployment of staff, increased absence from school and challenges of engaging with home learning. Since the return to schools there is also an increase in level and complexity of need being reported by schools.	Mitigate	Frequent communications between agencies, providers and families to identify and respond to related matters as quickly as possible. For those with an EHC plan, the annual review process will provide more information. It is important that schools and colleges use the substantial amounts of “catch up premium” funding provided directly to them by the Department for Education to provide additional support to relevant learners. The impact of COVID on the content and	High

			number of requests for EHC needs assessments will also be monitored.	
<b>Workstream 1: Participation , Engagement and Co-production</b>				
Inability to secure an effective and engaged parent-carer forum (PCF) that is able to work collaboratively in the SEND partnership.	The voices and opinions of parents and carers do not inform strategic decision-making. Implementation of the plan is not successful as parents are not informed, aware or signed up to the system change required.	Mitigate	Develop ways to incentivise and reward parents and carers to be involved. PCF membership of the SEND Partnership Forum and workstreams.	Moderate
<b>Workstream 2: Joint Commissioning</b>				
Inability to recruit and retain professionals with commercial and contract management expertise	There is insufficient capacity or skill in the placement commissioning to negotiate and manage contracts with providers that reduce costs.	Mitigate	Job profiles, salary levels and the recruitment process attract good candidates with commercial expertise and experience. There is an effective induction, development and support package available to all professionals involved	High
Commercial negotiations with SEND providers are unproductive.	Placement costs are not reduced, meaning that additional savings have to be found from other areas of the plan.	Mitigate	There is an effective induction, development and support package available to all professionals involved in placement brokerage. Expertise in commercial contract management is secured from the Council or brought in from an external consultant on a risk and reward basis.	High

<b>Workstream 3: Local Provision</b>				
Support from schools for the local SEND provision plan is not consistent or sufficient to create the additional school places required.	There are insufficient local special school places to meet the needs identified in the SEND provision plan, making the Council more reliant on maintained and special schools outside the borough and on non-maintained and independent school provision	Mitigate	There is effective engagement and communication with schools through existing networks to agree the local provision plan. Proposals are based on a detailed analysis of local needs. Good consultation with schools and other stakeholders leads to strong proposals and well managed plans to develop new provision.	Low
Local therapy provision is unable to be delivered to meet the identified needs of children with disabilities.	Children's therapeutic needs cannot be met locally leading to placements in more specialist school provision and at a higher cost.	Mitigate	The recommendations of the therapy review are implemented asap, and sufficient funding and resources secured.	High
Parents and carers do not feel confident that local mainstream schools, specialist resource provisions and special schools are able to meet their child's assessed needs.	There is an increase in the number of disputed EHCPs and appeals to the First-Tier SEND Tribunal on the basis of parental preference. The workload for SEND professionals is increased and there is a potential for the tribunal to direct that the local authority makes alternative and higher cost provision.	Mitigate	There is a clear strategy to promote the resources and facilities available in local provision and the outcomes they achieve for children and young people with SEND. The quality of local provision is actively promoted by all practitioners in their relationships with parents and through their professional networks.	Moderate
Emotional wellbeing and mental health needs amongst children and young	Expenditure from the High Needs Block increases to meet their needs	Mitigate	Develop the universal early intervention offer, recruit and redeploy staff to meet needs as	High



with and without SEND increase			quickly as possible and prevent escalation where possible, develop iThrive model asap.	
Lack of available specialist places	That there are not sufficient specialist places within the borough, or out of borough and children and young people may be left without appropriate provision. Lack of specialist places is also increasing the price of placements and therefore increasing overall spend.	Mitigate	Ensure that the development of new specialist placements including the new special free school open as soon as possible, this will need collaborative work from multiple partners and looking for alternative solutions wherever possible. Continue to ensure that mapping of appropriate provision.	High
<b>Workstream 4: Early Interventions and Transitions</b>				
School professionals do not support inclusion and early intervention, or there is inconsistent support across schools.	Children and young people with SEND cannot be supported within mainstream schools or specialist resource provisions, meaning that they have to be transferred to special schools or non-maintained and independent schools at a higher cost.	Mitigate	There is effective engagement and communication with professionals through the SENCO and headteacher networks. There is an effective learning, development and support offer to schools to support inclusive practice. The shape of the offer is informed by learning from EHCP assessments, tribunals and other feedback.	Moderate
Inability to recruit and retain professionals who are able to provide expert outreach	There is insufficient capacity, skill and expertise within the inclusion service to support schools with targeted interventions.	Mitigate	Job profiles, salary levels and the recruitment process attract good candidates with inclusion expertise	Moderate

<p>support to schools and providers.</p>			<p>and experience. Flexible working arrangements are available including secondments from schools. There is an effective induction, development and support package available to all professionals involved in targeted interventions.</p>	
<p>Transition arrangements between children’s services and adult social care services are not implemented.</p>	<p>Young adults with SEND do not receive the support they need in a timely way from the appropriate services. Ineffective transition and working arrangements between children’s services and adult social care lead to fragmentation and build higher costs into the system.</p>	<p>Mitigate</p>	<p>The preparing for adulthood strategy, transitions protocol and inclusion in the Council’s Maximising Independence transformation programme facilitates early consideration and planning for young people’s transition. Funding responsibilities are made clear within the protocol and are agreed in each individual case.</p>	<p>High</p>
<p><b>Workstream 5: Assessment and Planning</b></p>				
<p>Inability to recruit and retain experienced professionals within the SEND service, including educational psychologists, case workers and annual review officers.</p>	<p>There is insufficient capacity, skill and expertise within the SEND service to drive up the quality of EHCPs and maximise the benefit of the annual EHCP review process.</p>	<p>Mitigate</p>	<p>Job profiles, salary levels and the recruitment process attract good candidates with SEND expertise and experience. Flexible working arrangements are available, including secondments from schools. There is an effective induction, development and support package available to all SEND professionals.</p>	<p>High</p>

<p>Annual EHCP reviews and updates to plans following quality assurance require substantial changes to plans.</p>	<p>There is insufficient capacity within the SEND service to make required changes to EHCPs. Proposed changes to plans result in parental challenge, disputed EHCPs and appeals to the SEND tribunal, which may result in higher cost provision.</p>	<p>Mitigate</p>	<p>The management structure and staffing of the SEND service is regularly reviewed to ensure sufficient capacity. There is a priority programme for annual EHCP reviews and quality assurance and this is well coordinated and managed by specific senior staff. There is engagement with parents and carers. Assessments and plans are well evidenced by all contributing professionals.</p>	<p>High</p>
<p>Annual EHCP reviews do not reduce the costs of individual plans to an affordable funding level that meets the child's or young person's needs.</p>	<p>Proposed changes to plans result in increased parental challenge, disputed EHCPs and appeals to the SEND tribunal, which may result in higher cost provision</p>	<p>Mitigate</p>	<p>Annual EHCP reviews and quality assurance are well coordinated and managed. There is engagement with parents and carers. Assessments and plans are well evidenced by all contributing professionals.</p>	<p>High</p>
<p>The SEND service does not have the systems, processes and support it needs to drive up the quality of EHCP assessments and plans.</p>	<p>The quality of EHCP assessments and plans does not improve at the required pace. EHCPs do not robustly and sufficiently evidence how and where children's and young people's education, health and care needs can be met. This may result in increased parental challenge, disputed EHCPs and appeals to the SEND tribunal, which may result in higher cost provision.</p>	<p>Mitigate</p>	<p>There is a priority programme for annual EHCP reviews and quality assurance.</p>	<p>High</p>