

# Richmond upon Thames Joint Local Area SEND Inspection Written Statement of Action

February 2022

(Approved by Ofsted and the CQC 22/2/22)



## 1. Introduction

1.1 Richmond received its local area SEND inspection in June 2021. Although the inspection identified a number of strengths and areas of improving practice, it also identified one area of significant weakness in our local area relating to the transition of young people to adulthood and greater independence. Senior officers across the local authority (LA) and the South West London Clinical Commissioning Group (CCG) accepted the findings of the inspection in full and immediately set out to address the areas for development, building on the existing multi-agency SEND Futures Plan, which inspectors recognised as comprehensive and coherent. The outcome of the inspection is that the local area must produce a Written Statement of Action (WSOA) setting out how the significant weakness will be addressed in order to improve outcomes for children and young people.

1.2 Richmond Council and South West London CCG are jointly responsible for submitting this Written Statement of Action. We have worked with young people, the Parent Carer Forum (PCF) and our partners to jointly create the statement. In October AfC's SEND Participation Officer for Children and Young People with SEND consulted with 35 young people with SEND between the ages of 13 and 24 years, with and without EHC plans, from mainstream and special schools, mainstream and specialist colleges, being home educated, attending adult education, taking part in work programmes and doing voluntary work. The PCF engaged with over one hundred parents and carers in September and October including through an online survey, drop-in sessions via Zoom and in 1:1 consultations. In addition to a range of related multi-agency meetings over recent months, the SEND Partnership Board contributed to content during the autumn and in January. We will continue to use co-production principles to monitor progress, address identified weaknesses and develop the services we provide to children and young people with special educational needs and disabilities.

1.3 The area of significant weakness identified in the inspection was:

*Over time, the area's transition arrangements have not been effective at identifying and meeting the needs of children and young people. In particular:*

- *What young people need after the age of 16 is not identified early or well enough. This means providers do not know enough about how to meet young people's needs. Young people do not have enough support for a successful transition to adulthood.*
- *The annual review process has benefited from recent improvement but still leaves many parents not informed quickly enough about its outcome. The annual review at Year 11 is not used well enough to inform post-16 provision.*

- *The objectives<sup>1</sup> in EHC plans are not focused sharply or early enough on developing the independence of children and young people.*
- *Transition pathways in health are not embedded across the full range of services.*

1.4 The lead officers overseeing the development and delivery of this WSOA are:

- Ian Dodds, Director of Children’s Services, Richmond Council
- Martin Ellis, Director of Transformation, South West London Clinical Commissioning Group

1.5 The co-authors of this WSOA are:

- Charis Penfold, Director of Education Services, Achieving for Children (AfC)
- Anna Chiva, Associate Director for SEND, AfC
- Alison Stewart, Designated Clinical Officer for SEND, South West London CCG
- Karel Stevens-Lee, Deputy Head of Transformation & Children’s Services Lead for Richmond, South West London CCG

1.5 At the end of June 2022, Clinical Commissioning Groups (nationally) will cease to exist and Integrated Care Systems (ICSs) will become statutory bodies taking on their responsibilities. [More information is available here in a briefing paper prepared by the National Children’s Bureau and the Council for Disabled Children.](#) **References in this document to South West London ICS (Richmond) can be assumed to be references to South West London CCG (Richmond) prior to July 2022.**

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<sup>1</sup> In accordance with local strategy we will use the term “outcomes” rather than “objectives”

## 2. How we are addressing improvements

2.1 The inspection was a welcome and helpful assessment of Richmond’s effectiveness in implementing the SEND Reforms of 2014 and the performance of all key players in the local SEND system in identifying needs, meeting needs, and improving outcomes for children and young people with special educational needs and disabilities. As leaders in Richmond, we agreed with the findings of the inspection, and began work on implementing the learning in June 2021 after the verbal feedback had been received. We also continued to embed the improvements that had been recently implemented, but had not had time to have sufficient impact, such as the transitions pathways protocol, which inspectors described as “well considered”.

2.2 Richmond has had a strategic plan to improve our SEND services, our [SEND Futures Plan](#), since 2019. This is the plan that the inspectors found to be coherent. To give the WSOA sufficient priority and focus, we have decided to make it the subject of a new sixth workstream in the SEND Futures Plan. This means that the WSOA will adopt the broad principles of the wider SEND Futures Plan, including its vision, shared principles and developing outcomes framework. We will monitor the delivery of the WSOA through the existing governance mechanisms for the SEND Futures Plan; these are described in section 3 and include scrutiny and oversight by a multi-agency SEND Partnership Board, which also has representation from young people, parents and carers.

2.3 Richmond’s vision is that:

**Every child and young person with SEND belongs to a local, inclusive community that provides the education, health and social care support they need to develop their talents and skills, and that empowers them to live a happy and fulfilling life.**

2.4 Our shared principles guide how we will make decisions and work to achieve our vision. These are:

- Co-production
- Personalisation
- Integration of the whole system
- Quality
- Inclusion

2.5 The existing SEND Futures Plan includes the development of a multi-agency strategic outcomes framework for supporting children and young people with SEND and their families in Richmond. The measurement of the impact of the WSOA will include an assessment of performance against this outcomes framework. The six key outcomes are shown below. As the framework is developed, it will help direct the work of all workstreams to make sure that services are all aligned in delivering the same shared vision.

Richmond's vision for children and young people with SEND includes them feeling that:



### 3. Governance: assessment and monitoring of the Written Statement of Action

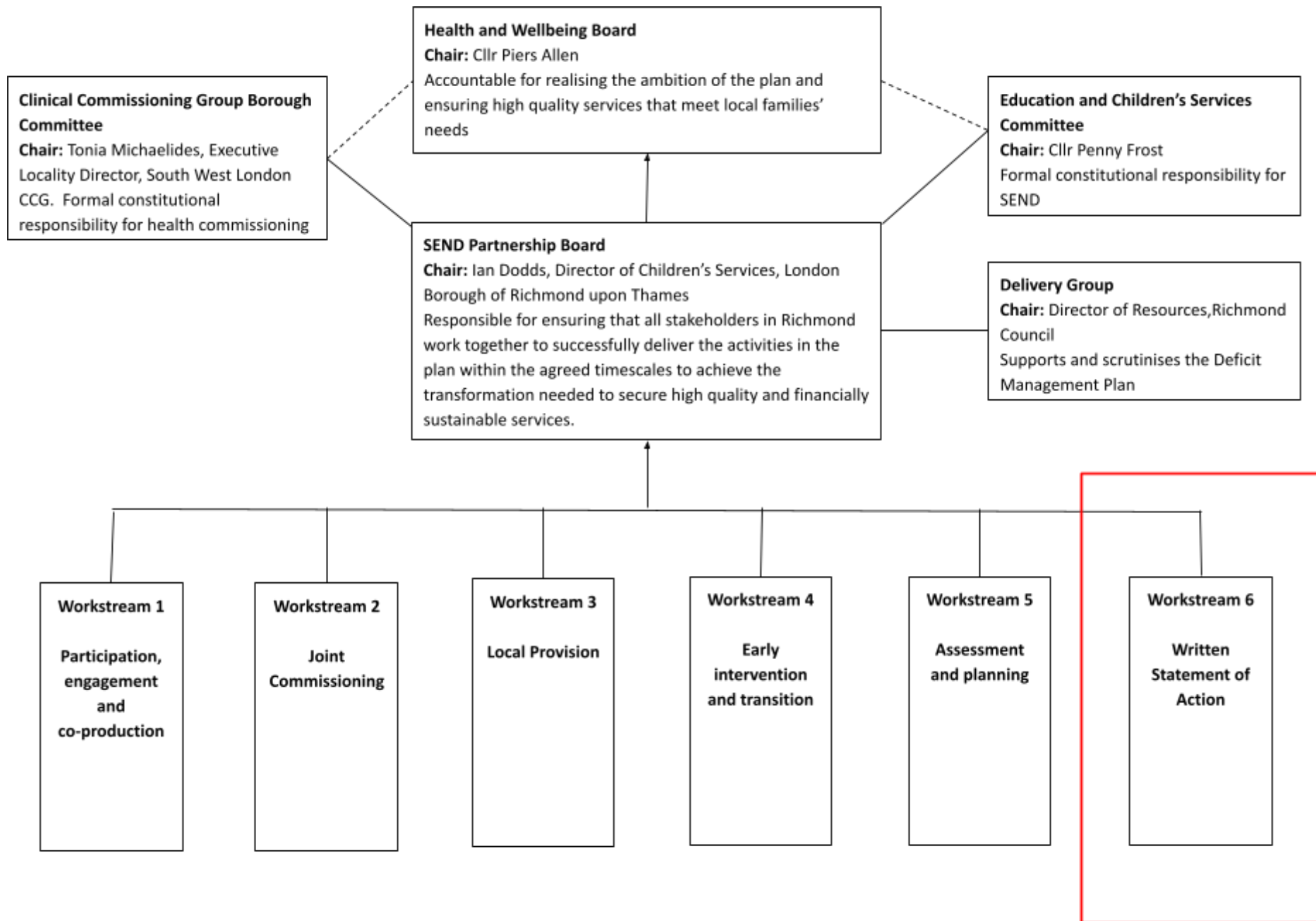
There is a well-established and effective governance framework for the SEND Futures Plan, which is shown in the diagram below and chart on the following page. This governance framework ensures there is a whole system approach to the improvement of services for children and young people with special educational needs and disabilities. Given that the local authority and the CCG are jointly responsible for implementing the WSOA, we will use the existing governance framework to ensure its effective delivery through the addition of a new sixth workstream in the SEND Futures programme; however, some of the required improvements will also be delivered by other workstreams in the programme, such as those on commissioning (workstream 2) and assessment and planning (workstream 5). The established Transitions Board will also have an important role to play in putting into practice the improvements being implemented as part of the WSOA.

<b>Governance mechanism</b>	<b>Frequency</b>
Workstream 6 of the SEND Futures Plan	Every two months
The SEND Partnership Board	Every two months
The Clinical Commissioning Group's Borough Committee <sup>2</sup>	Every two months
The Council's Education and Children's Services Committee	Quarterly
The local area's Health and Wellbeing Board	Six monthly

The SEND Partnership Board, chaired by the Council's Director of Children's Services, has an existing performance dashboard, updated quarterly, that is already routinely considered by the boards and committees within the governance structure. The performance dashboard is published online on both the Council and Local Offer websites. The key performance indicators relating to this WSOA will be included in this dashboard under the relevant SEND Futures Plan workstream and be the subject of a standing agenda item at SEND Partnership Board meetings.

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<sup>2</sup> To be replaced by SW London ICS Place Committee



## 4. Written Statement of Action (WSOA)

The WSOA breaks the single area of significant weakness into five sections. Under 4.1 we have identified five overarching principles that span the whole WSOA, whilst in 4.2, 4.3, 4.4, and 4.5 we address each of the four areas identified in the inspection as needing particular improvement. Each of these four particular areas has an “outcome statement”, a set of key performance indicators, and a description of the actions we are taking, and changes we are making, to deliver improvement. Some actions build on current processes whilst others such as developing holistic outcomes in EHC plans require systemic change across all partners, which takes time to implement and embed.

Formal monitoring through data collection will take place every 6 months, in March and September, from March 2022 to September 2024, once a baseline for every indicator is agreed. The timescales recognise the need for pace and ambition, whilst acknowledging that the impact of the transition process at the end of an academic year, can only be assessed annually.

### **4.1 The inspection report said: *The area’s transition arrangements have not been effective at identifying and meeting the needs of children and young people***

We have agreed the following overarching principles that span all the work of the WSOA. The local area will:

1. include children, young people, parents and carers not only in the development of the WSOA, but also in related decision making, implementation, monitoring and assessment
2. communicate information relating to the WSOA in a transparent and accessible way
3. support voluntary sector SEND provision and promote it across family and professional networks to maximise the realisation of opportunities, including as part of the Preparing for Adulthood pathway, and including supporting volunteering opportunities
4. ensure that all staff across the system are supported and informed to embed the vision, including through skills development as required
5. build on the positive feedback from the inspection about improvements resulting from joint commissioning projects and fully implement the local area’s [Joint Commissioning Strategy](#) across the whole partnership



**4.2 The inspection report said: *What young people need after the age of 16 is not identified early or well enough. This means providers do not know enough about how to meet young people’s needs. Young people do not have enough support for a successful transition to adulthood***

**The outcome we will deliver for young people with SEND in Richmond is :**

*The hopes, dreams, aspirations and needs of children and young people will be systematically identified and collated during the annual review process. Providers will have timely information to allow sufficient planning so that appropriate pathways, in line with the aspirations of young people, will be in place by the time the young person becomes 16. The local offer will include sufficient opportunities for the needs of young people in relation to their employment and training pathways. The support provided to young people, such as advice and guidance including from specialist careers guidance in education settings, will allow them to successfully navigate the transition process relating to their education, health and care needs. EHC plans will be consistently focused on holistic long-term outcomes. Joint commissioning will be informed and effective, especially for those with the most complex needs, and the support provided will support a successful transition to adulthood*

**We will know we have achieved this because:**

Key Performance Indicators					
1	The proportion (%) of annual reviews from Year 9 onwards where the professional advice provided for the annual review, and the review, is shared with the provider by 30th September each year.	3/2022	9/2022	3/2023	9/2023
		Baseline to be set	75%	75%	85%
2	The proportion (%) of EHC plans for young people entering post-16 provision in Year 11 or transferring to other post-16 provision at Year 14 that are finalised by the 31st March, with parents, carers and all relevant education, health and care providers receiving these annual reviews and supporting evidence by the same date each year.	3/2022	9/2022	3/2023	9/2023
		Baseline to be set	75%	75%	85%
3	The proportion (%) of annual reviews and interviews with young people that indicate that the	3/2022	9/2022	3/2023	9/2023

	education, health and care support specified in the EHC plan is being provided and is meeting the needs of the young person.	Baseline to be set	65%	75%	85%
4	The proportion (%) of young people aged 16 to 25 with EHC plans who are in education, training or employment. (London average 3/2021 93.7%)	3/2022	9/2022	3/2023	9/2023
		88%	93%	95%	95%
5	The proportion (%) of young people aged 16 to 25 at SEN Support level who are in education, training or employment. (London average 3/2021 92%)	3/2022	9/2022	3/2023	9/2023
		94%	94%	95%	95%
6	The proportion (%) of young people with EHC plans at local colleges in Year 12 who report that support with their transition to post-16 has been good or better.	3/2022	9/2022	3/2023	9/2023
		Baseline to be set	65%	75%	85%
7	The proportion (%) of young people aged 18 who report that support with their transition to adult social care has been good or better. New survey to go out in April each year with results reported in September each year).	3/2022	9/2022	3/2023	9/2023
		Baseline to be set	75%	75%	85%
8	The proportion (%) of audited EHC plans where there is evidence that the transition protocol has been followed leading to a positive transition and outcome for the young person.	3/2022	9/2022	3/2023	9/2023
		Baseline to be set	75%	85%	95%

**The actions we will take to achieve this are:**

Actions		By when?	Lead Officer(s)
a	Establish a new process to centrally collect information about needs from Year 9 onwards for young people with and without an EHC plan. This information, including that received from EHC plan annual	New process to collect information established by July 2022 and information shared by September	Head of Strategic Commissioning, AfC Designated Clinical Officer for

	reviews and SEN2 SEND Support information, will be shared with commissioners and providers by the end of September each year to inform commissioning and provision planning in the following academic year. In addition, the annual survey of Year 11 students at state schools in Richmond, which collects information about individual SEND students with specific transition support requirements, will be shared with the relevant post-16 education provider at the start of the summer term in September each year.	2022. Impact confirmed from the following academic year in September 2023.	SEND, CCG Head of SEND, AfC
b	Update and implement the existing <a href="#">SEND Joint Commissioning Strategy</a> to ensure comprehensive coverage of 16 to 25 commissioning arrangements for all of education, health and care services and appropriate provision for children and young people in their transition to adulthood and accessing continuing healthcare.	Updated strategy implemented by September 2022. Impact confirmed from the same date as improvements to commissioning arrangements are made.	Associate Director for Commissioning, AfC ICS CYP Transformation Lead Head of Promoting Independence, Adult Social Care and Public Health, Richmond Council Head of Adult Continuing Health Care, South West London ICS
c	Work with the <a href="#">National Development Team for Inclusion</a> to develop a new overarching post-16 transitions framework to formalise the process in the local area.	Framework in place by 1st April 2022. Impact from September 2022.	Associate Director of SEND, AfC Designated Clinical Officer for SEND, CCG
d	Use the new transitions framework to work with education providers to review their processes for supporting effective transition and identify young people without an EHC plan who need additional support for the Year 11 transition.	New process in place by July 2022. Impact from September 2022.	Designated Social Care Officer for SEND, AfC

e	Offer a training programme to colleges from a range of professionals including targeted support from educational psychology and speech and language therapy.	Training offered from January 2022. Impact confirmed in September 2022.	Deputy Director of Clinical Services, Hounslow and Richmond Community Healthcare NHS Trust Head of Promoting Independence, Adult Social Care and Public Health, Richmond Council Head of Learning and Development, AfC
f	Apply the new Transitions Framework and work with school SEND Coordinators and school leaders of career guidance to collaborate in annual reviews from and including Year 9. This will offer effective guidance to support transition planning and a careers interview in line with Gatsby Benchmark <sup>3</sup> 8 and using the National Development Team for Inclusion (NDTI) best practice guides <sup>4</sup> . Ensure all young people with SEND will have careers advice that meets statutory requirements.	Framework applied From January 2022. Impact confirmed by September 2022.	14-25 Manager, AfC 14-25 Specialist Careers Advisor for SEND, AfC Richmond secondary schools
g	Improve the quality of information (including on the Local Offer website) and training (including bespoke person centred conversations) available on transitions for children and young people, and on how parents and carers can support their child. To include information on the voluntary sector offer, appropriate language, and accessibility for all (i.e. including parents and carers with their own additional needs)	Improved information available from September 2022. Impact from the same date.	Head of Marketing and Communications, AfC Head of Strategic Commissioning, AfC

<sup>3</sup> There are eight benchmarks in the Gatsby framework for good career guidance. [For more information see https://www.gatsby.org.uk/education/focus-areas/good-career-guidance](https://www.gatsby.org.uk/education/focus-areas/good-career-guidance)

<sup>4</sup> Supported by the Department for Education, the NDTI has developed three guides that demonstrate best practice. [More information is available here.](#)

**4.3 The inspection report said: *The annual review process has benefited from recent improvement but still leaves many parents not informed quickly enough about its outcome. The annual review at Year 11 is not used well enough to inform post-16 provision***

**The outcome we will deliver for young people with SEND in Richmond is :**

*All stakeholders understand and prepare well for the annual review process, embedding the Preparation for Adulthood Framework into reviews from Year 9 onwards, with all reviews and the communication of their outcomes being completed in accordance with statutory timescales.*

**We will know we have achieved this because:**

Key Performance Indicators					
1	The proportion (%) of EHC plans for young people entering post-16 provision in Year 11 or transferring to other post-16 provision at Year 14 that are finalised by the 31st March, with parents, carers and all relevant education, health and care providers receiving these annual reviews and supporting evidence by the same date each year.	3/2022	9/2022	3/2023	9/2023
		Baseline to be set	75%	75%	85%
2	The proportion (%) of annual reviews of EHC plans from Year 9 onwards completed within 12 months of the previous annual review or the issue of a plan.	3/2022	9/2022	3/2023	9/2023
		40%	55%	70%	85%
3	The proportion (%) of audited new EHC plans of young people going through transition into post-16 provision that are judged to be good or better through local quality assurance processes.	3/2022	9/2022	3/2023	9/2023
		Baseline to be set	75%	85%	95%
4	The proportion (%) of annual review decisions from Year 9 onwards made within 4 weeks	3/2022	9/2022	3/2023	9/2023
		Baseline to be set	75%	85%	95%

**The actions we will take to achieve this are:**

Actions		By when?	Lead Officer(s)
a	Amend EHC plan quality assurance and quality improvement processes to include a specific assessment of the quality of Preparing for Adulthood outcomes.	Quality assurance process amended by March 2022. Impact confirmed by September 2022.	Head of SEND, AfC Designated Clinical Officer for SEND, CCG Designated Social Care Officer for SEND, AfC Head of Learning and Development, AfC
b	Introduce person-centred reviews for young people from Year 9 onwards and work with providers to ensure Preparing for Adulthood outcomes are embedded within the annual review process including through adoption of best practice from involvement in the PFA Regional Project.	Person-centred interviews implemented by September 2022. Impact confirmed by March 2023.	
c	Complete an annual audit of key stakeholders to assess their awareness of their statutory duties and use this information to inform the local workforce development strategy.	Initial annual audit completed by June 2022. Impact from September 2022.	
d	Complete an annual audit of outcomes of annual reviews to inform the local workforce development strategy, service priorities and service recommissioning.	Initial annual audit completed by September 2022. Impact confirmed from March 2023.	

**4.4 The inspection report said: *The objectives in EHC plans are not focused sharply or early enough on developing the independence of children and young people***

**The outcome we will deliver for young people with SEND in Richmond is :**

*The local area’s multi agency workforce is skilled at writing high quality advice for, and holistic outcomes in, EHC plans so that plans focus on Preparing for Adulthood and support the young person to develop greater independence*

**We will know we have achieved this because:**

Key performance indicators					
1	The proportion (%) of audited new EHC plans (all ages) judged to include good or better holistic outcomes focused on developing independence through local quality assurance processes.	3/2022	9/2022	3/2023	9/2023
		Baseline to be set	70%	80%	90%
2	The proportion (%) of audited new EHC plans from Year 9 onwards that include Preparing for Adulthood outcomes referencing employment, independence, friendships, relationships, community involvement and maintaining good health.	3/2022	9/2022	3/2023	9/2023
		Baseline to be set	70%	80%	90%

**The actions we will take to achieve this are:**

Actions	By when?	Lead Officer(s)
a Amend quality assurance and quality improvement processes for EHC plans to include a specific assessment of the quality of holistic outcomes.	Process amended by March 2022. Impact confirmed from September 2022.	Head of SEND, AfC Designated Clinical Officer for SEND, CCG Designated Social Care Officer for SEND, AfC

			Head of Learning and Development, AfC Assistant Director for Adult Social Care Services, Richmond Council
b	Deliver annual training to professionals on writing advice for EHC plans and on writing holistic outcomes with a focus on fostering independence and preparing for adulthood.	Initial training delivered by September 2022. Impact confirmed by March 2023.	Designated Clinical Officer for SEND, CCG Head of SEND, AfC
c	Deliver annual training to professionals on person-centred reviews to ensure a focus on preparing for adulthood.	Initial training delivered by April 2022. Impact confirmed from September 2022.	
d	Provide model templates to schools and professionals for writing advice for EHC plans that reflect holistic outcomes and are focused on preparing for adulthood.	Template provided by April 2022. Impact confirmed from September 2022.	Designated Clinical Officer for SEND, CCG Head of SEND, AfC Head of Promoting Independence, Adult Social Care, Richmond Council
e	Pilot drafting of EHC plans to include Preparing for Adulthood outcomes from Year 7.	Pilot established by September 2022. Pilot evaluated by March 2023.	SEND school based advisor, AfC 14 - 25 Service Manager, AfC



#### 4.5 Transition pathways in health are not embedded across the full range of services

The outcome we will deliver for young people with SEND in Richmond is :

*There are well embedded transition pathways for speech and language therapy, occupational therapy and physiotherapy, and support as specified in EHC plans is delivered for all young people up to the age of 25. Those with continuing care needs are supported into adult services in accordance with the children and young people’s continuing care and adult continuing healthcare frameworks. Young people with emotional wellbeing and mental health needs have these met up to the age of 25, and all health providers deliver their statutory duty relating to reasonable adjustments.*

We will know we have achieved this because:

Key performance indicators									
1	The proportion (%) of young people aged 16 to 25 years that receive the speech and language therapy and occupational therapy provision stated in their EHC plan					3/2022	9/2022	3/2023	3/2024
						Baseline to be set	75%	85%	95%
2	The proportion (%) of young people aged 16 to 25 years with complex mental health needs identified through the Dynamic Support Register transferred to the appropriate adult service.					3/2022	9/2022	3/2023	9/2023
						Baseline to be set	75%	85%	100%
3	The proportion (%) of young people aged 16 to 25 years that receive the mental health provision stated in their EHC plan.					3/2022	9/2022	3/2023	9/2023
						Baseline to be set	75%	85%	95%
4	The proportion (%) of young people aged 14 to 25 years with learning disabilities who receive an annual health check.	Age	3/2022	9/2022	3/2023	9/2023			

		14-18	51%	75%	85%	85%
		19-25	67%	85%	85%	85%

**The actions we will take to achieve this are:**

Actions		By when?	Lead Officer(s)
a	Monitor all young people transitioning to adult social care and health services from the age of 16 so that adult commissioners and providers are aware of young people entering adult services and can plan accordingly.	Shared tracking system strengthened by April 2022. Impact confirmed from September 2022.	ICS CYP Transformation Lead Head of Mental Health, Learning Disabilities and Children's Services NHS South West London CCG Head of Adult Continuing Health Care for Richmond, South West London ICS Head of Promoting Independence, Adult Social Care, Richmond Council
b	Formalise spot commissioning arrangements for speech and language therapy and occupational therapy for all ages up to 25 years.	Spot commissioning arrangements agreed by April 2022. Impact confirmed from the same date.	ICS CYP Transformation Lead
c	Review therapy provision for young people aged 18-25.	Review completed by June 2022. Impact confirmed from September 2022.	ICS CYP Transformation Lead Head of Mental Health, Learning Disabilities and Children's Services NHS South West London CCG

d	Commission sufficient therapy provision so that young people receive the level of provision recommended in their EHC plan.	Improved therapy provision in place by September 2022 with impact from the same date.	ICS CYP Transformation Lead Head of Mental Health, Learning Disabilities and Children's Services NHS South West London CCG Deputy Director of Clinical Services, Hounslow and Richmond Community Healthcare NHS Trust
e	Provide clear therapy transition pathways from children's services to adult services.	Improvements and impact in place from September 2022.	ICS CYP Transformation Lead Head of Therapies, Hounslow and Richmond Community Healthcare NHS Trust
f	Implement a transition pathway for children and young people accessing continuing care into adult continuing health care,		ICS CYP Transformation Lead Head of Adult Continuing Health Care for Richmond, South West London ICS
g	Extend the mental health offer for young people aged 16 to 25 by implementing a mental health transitions framework to support young people transitioning from children's to adult mental health services.		ICS CYP Transformation Lead SWLStG Adult Borough Lead SWLStG Children Borough Lead Associate Director of Emotional Health Service, Achieving for Children

## 5. Our commitment

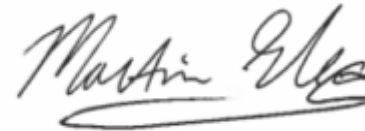
Richmond Council and South West London CCG commit to jointly delivering improvements as set out in this statement of action. We will work with partners across the system, ensuring this is a priority for all, and delivering improvements at pace. We will involve young people, parents and carers and ensure they are at the heart of all that we do.

## 6. Signatures on behalf of Richmond Council and South West London Clinical Commissioning Group

This written statement of action is the result of collaboration between colleagues from Achieving for Children, Richmond Council, South West London CCG and other partners from across the local area.



Ian Dodds  
Director of Children's Services  
Richmond Council



Martin Ellis  
Director of Transformation  
South West London CCG

## Glossary

AD	Associate Director
AfC	Achieving for Children
CCG	Clinical Commissioning Group
CYP	Children and young people
EHCP / EHC Plan	Education Health and Care Plan
GP	General Practitioner
ICS	Integrated Care System, <a href="#">more information available here</a>
LD	Learning Disability
PFA	Preparing for Adulthood, <a href="#">more information available here</a>
SEND	Special Educational Needs and / or Disability
SWL ICS	South West London Integrated Care System
SWLStG	South West London St George's