SEND LOCAL AREA

Written Statement of Action

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August 2019

Version 2

Introduction

This document outlines the commitment of Thurrock Council and Thurrock's Clinical Commissioning Group (CCG) to address the areas of concern, which were identified in Thurrock's Local Area SEND Inspection, which took place 4th-8th March 2019.

The document highlighted three key areas:

- **Significant weakness 1:** Inaccurate and incomplete records and ineffective oversight mean that leaders did not know the whereabouts of some children and young people and what provision they have.

- **Significant weakness 2:** Quality assurance is not rigorous enough to ensure effective governance and oversight across the provision and services for 0 to 25-year-olds with SEND. Leaders are reliant on working relationships rather than processes. Leaders are over reliant on the limited information given to them by educational providers about the quality of the provision they purchase.

- **Significant weakness 3:** Education Health and Care Plans (EHCP) and the annual review process are of poor quality. The local authority has no system in place to make sure that relevant professionals and services are notified when EHC plans need reviewing or updating. Professionals are not routinely informed of requests to submit written information within specified timescales. Too often, EHC plans are out of date and do not accurately reflect the needs or views of children and young people, or the views of the families. The information from EHC plans and annual reviews is not used to inform the commissioning of services, particularly, but not exclusively, for young people between the ages of 19 and 25 years.
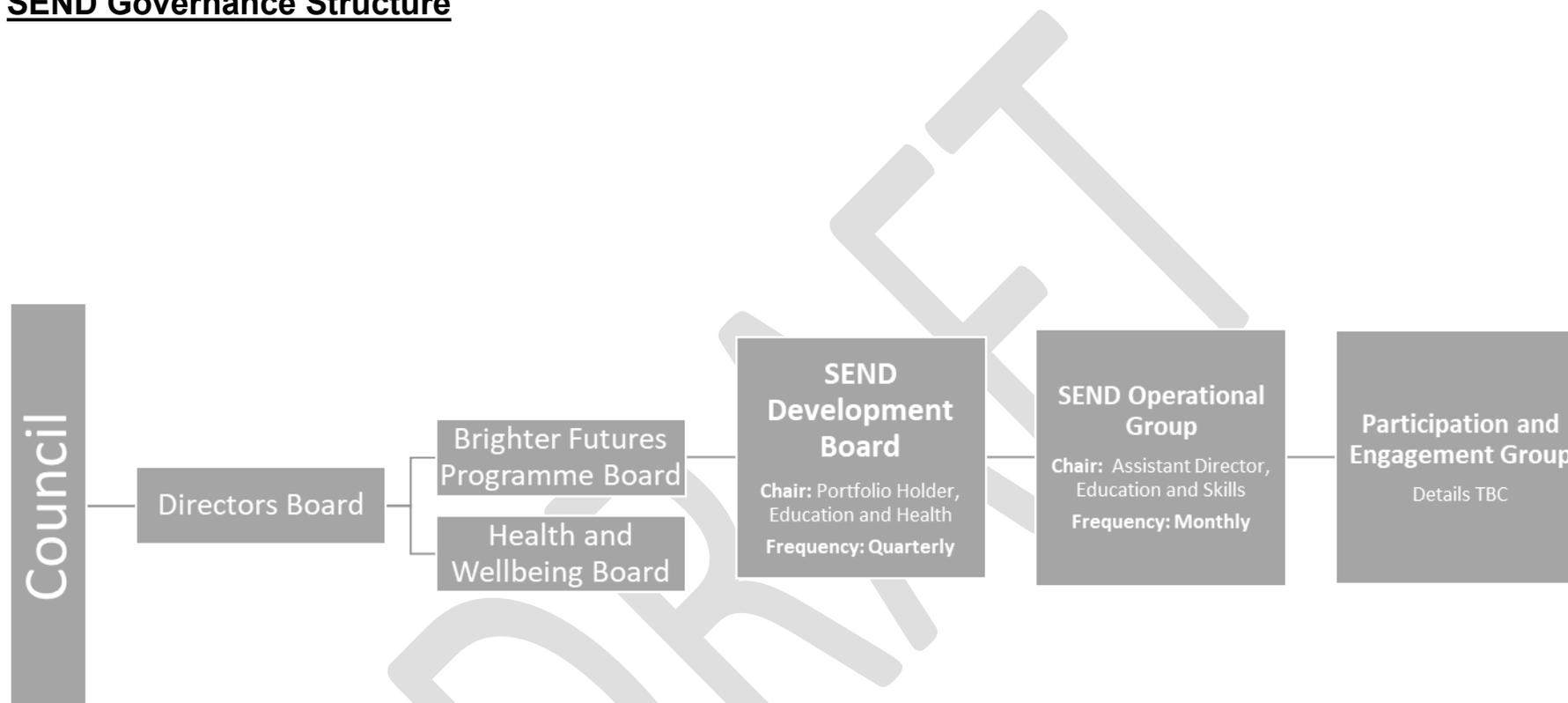
Our written statement of action has been produced in partnership with the Thurrock Council, CCG and Public Health to ensure that all key partners are working together to address the weaknesses identified in the recent inspection. In addition, we have shared the document with our Children's Overview and Scrutiny board, young people, our parent groups, and a focus group of parents and carers recognising the importance of shared ownership and commitment to children and young people with SEND.

The monitoring of this statement of action will take place on a quarterly basis with the Department for Education (DfE) and NHS England, and implementation will be monitored and scrutinised through the Thurrock SEND Development Board which is chaired by the Portfolio Holder for Education and Health. Our Operational SEND Group will oversee our work plans and monitor internal performance measures to ensure we have a robust system of quality assurance in place.

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Key responsible people

Portfolio Holder for Education & Health (PFH)	Cllr James Halden	**CEO Thurrock Council**	Lyn Carpenter
Leader of the Council	Cllr Rob Gledhill	**Portfolio Holder Children & Adult Social Care**	Cllr Susan Little
Corporate Director	Roger Harris	**Assistant Director, & Consultant in Public Health**	Teresa Salami Oru
Assistant Director Education & Skills	Michele Lucas	**Director Children's Social Care**	Sheila Murphy
Strategic Lead Specialist Provision and Senior EP	Malcolm Taylor	**Strategic Lead School Effectiveness and SEND**	Andrea Winstone
Post 16 Service Manager	Kate Kozlova Boran	**Strategic Lead Business Intelligence**	Jackie Groom
Assistant Director for Integrated Commissioning for Children, Young People & Maternity	Helen Farmer	**Chief Nurse, CCG**	Jane Foster Taylor

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SEND Governance Structure

Council — Directors Board — Brighter Futures Programme Board / Health and Wellbeing Board — **SEND Development Board** Chair: Portfolio Holder, Education and Health **Frequency: Quarterly** — **SEND Operational Group** Chair: Assistant Director, Education and Skills **Frequency: Monthly** — **Participation and Engagement Group** Details TBC

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RAG RATING KEY	
RED	The action has not yet started or there is significant delay in implementation. The action must be prioritised to bring it back on track to deliver improvement.
AMBER	The action has started but there is some delay in implementation. The action must be monitored to ensure the required improvement is delivered.
LIGHT GREEN	The action is on track to be completed by the agreed date. Evidence is required to show that the improvement has been embedded and sustained.
GREEN	The action has been completed and there is evidence that the improvement has been embedded and sustained.

Initial RAG rating		Current Month October		Direction of travel since the previous quarter
RED		RED		
AMBER		AMBER		
LIGHT GREEN		LIGHT GREEN		
DARK GREEN		DARK GREEN		
COMPLETED		COMPLETED		
TOTAL		TOTAL		

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<u>Written Statement of Action</u>

Significant weakness 1: Inaccurate and incomplete records, and ineffective oversight mean that leaders did not know the whereabouts of some children and young people and what provision they have.

Aim of this programme of work:

To ensure that the authority knows where all children are placed and the type of provision commissioned and that we apply processes to confirm the quality of provision and the welfare of children and young people placed in different settings particularly those out of the authority.

We will undertake a review of SEN, EHCP records and ensure that they are updated. This will be reviewed monthly by senior manager and reported through our performance management framework to Directors Board and the SEND Development Board.

KPI's / Targets for assessing overall success of the programme

- All EHCP plans reviewed and quality assured to meet statutory assessment timelines

An accurate list of all C&YP with EHCPs:-

- Where they are placed

- Date the EHCP was reviewed and when next review is due

- For those placed in residential /out of authority or home educated dates of the last monitoring visits to check welfare

- Up todate information around children/young people who are "awaiting provision"

- Clear processes in place to ensure we are tracking those that may be missing

Target:- The system at any time can produce this information readily.

Improvement Area	Actions	Success Measure(s)	Lead	Governance Forum	Timescale	RAG	Progress Update
Management Oversight: 1. Realignment of Education and Skills to strengthen management oversight of SEN:- 2. To oversee and quality assure practice. 3. To monitor and review the quality of plans and quality assure the review timetable. 4. To oversee the post-16 offer and preparing for adulthood transition	Realignment documentation has been completed Consultation has taken place New Management Structure is in place	New management structure is in place Review undertaken in 6 months to measure impact of changes	Assistant Director Education and Skills	SEND Development Board	May 2019 Nov 2019		New management structure in place with two additional leads to ensure closer oversight of quality of provision, operational practice and post 16 offer.

Improvement Area	Actions	Success Measure(s)	Lead	Governance Forum	Timescale	RAG	Progress Update
Governance 5. SEND Development Board established	Membership agreed. The chair of the board is the PFH for Education and Health they will hold performance of SEND department to account in line with SEND Code of Practice. Regularly reporting around progress against the action plan.	Board will receive quarterly reports on the improvement journey of the SEND Service and reports from the work streams	Assistant Director Education and Skills Senior Management Team SEN Services	SEND Development Board SEND operational group	June 2019 June 2019		New board will meet on 14th June to oversee the development of the Written Statement of Action
6. Management oversight: Develop a performance management framework to enable the SEND Board to	Working with Public Health, CCG and other partners to develop a performance framework that will demonstrate a	Framework developed and reporting processes in place	Assistant Director Education and Skills PQBI Team	SEND Development Board	Quarterly report provided starting in September 2019		

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Improvement Area	Actions	Success Measure(s)	Lead	Governance Forum	Timescale	RAG	Progress Update
monitor and challenge progress	system wide approach to children and young people with SEND.						
Record keeping: 7. Carry out data quality assurance to ensure SEND data is accurate and informs understanding of activity and timeliness (Data to drive practice and performance)	Review all data currently held on the system to ensure it is accurate. Review current arrangements in terms of integration for Synergy, Liquid Logic and ECC's Capita systems with an aim of establishing an SEND data integration project.	Reports in place and used to inform targets Options appraisal developed and integration plan agreed	Strategic Lead Business Intelligence Assistant Director/Strategic Lead Business Intelligence	SEND Development Board Directors Board	September 2019 October 2019		An integration project team will be established. An options appraisal is currently in development. A resource has been identified to drive up data analysis and will have a clear brief on roles and responsibilities. Agreement has been given to "go off" Matrix to find a suitable candidate on an interim

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Improvement Area	Actions	Success Measure(s)	Lead	Governance Forum	Timescale	RAG	Progress Update
							basis.
Record keeping: 8. Progress the Synergy Health Check work	Progress the actions identified for improvement as part of the health check in light of the above action – to provide an integrated data system.	Notes of meeting and updated Synergy documents	Strategic Lead, Business Intelligence	SEND Development Board	Oct 2019		Plan is being developed to support this work
Record keeping: 9. Research the introduction of on line EHCP system and ensure that it is fit for purpose	Deliver Multi Agency training to support its use	Multi-agency events delivered summer term	Strategic Lead, Business Intelligence	Operational SEND Group	Nov 2019		The plan will include enhancements that make a difference to children and young people
Record keeping 10. Review all current EHCP plans on the system	Recruit additional capacity to complete Synergy data quality assurance audit	100% Records are accurate and up to date	Strategic Lead School Effectiveness/SEND	SEND Development Board	October 2019		This work is in progress – we have increased short term capacity in the team to enable us to

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Improvement Area	Actions	Success Measure(s)	Lead	Governance Forum	Timescale	RAG	Progress Update
	Undertake an audit of every EHCP and casefile to ensure all records are accurate		Service Manager Post 16				complete this task.

Significant Weakness 2: Quality assurance is not rigorous enough to ensure effective governance and oversight across the provision and services for 0 to 25-year-olds with SEND. Leaders are reliant on working relationships rather than processes. Leaders are over reliant on the limited information given to them by educational providers about the quality of the provision they purchase**.**

Aim of this programme of work:-

(i) Ensure relevant governing bodies (eg SEND Development Board and HWB) have access to a range of indicators relating to outcomes, service quality and performance to assess how well the local area is meeting the needs of CYP with SEND

(ii) Ensure key services for C&YP operate within a newly refreshed QA framework

KPI's/Targets for assessing overall success of the programme:-

a) Developing a strategic data dashboard covering education, health and social care provision which includes outcomes and indicators of service quality and performance for use by strategic managers and governing bodies responsible for overseeing the provision of services of C&YPm with SEND and taking policy/commissioning decisions

b) Developing a QA framework for key aspects of service delivery with priority over the next 18 months being given to the following:

- EHCP's include the views, wishes and feelings of children, young people, their families and carers
- EHCP's are clear, concise, understandable and accessible
- EHCP's set out how partners will co-ordinate and work together to support the child, young person, parent and carers
- EHCP's clearly identify need and include specific outcomes

  The framework will also be inclusive of those placed in independent/non maintained/residential settings and special circumstances.

c) Reviewing post 16 local offer and how it links into the adult social care transitional pathway.

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Improvement Area	Actions	Success Measure(s)	Lead	Governance Forum	Timescale	RAG	Progress Update
1. Quality of provision – post 16	Review quality and impact of all Post 16 provision	Post 16 training is fit for purpose and YP led	Service manager Post 16	SEND Operational Group	Dec 2019		Review is being undertaken
2. Quality of provision -	Deliver an engagement and communication strategy as informed by the SEND JSNA. In line with the Integrated Commissioning Framework for SEND, ensure all commissioning is co-designed with children, young people and parents		Strategic Lead, Specialist Provision	SEND Development board	Feb 2020		The initial engagement work with partners is underway. Initial planning of co-design of Integrated Commissioning process underway. MT/HG to complete link to JSNA
3. Quality of Provision	Employ new Send Inclusion Support office with Engagement and Partnership as part of their role to develop new relationship with parents regarding	Engagement & participation plan developed in partnership with parents/carers and young people	Strategic Lead, Specialist Provision	SEND Development Board	Jan 2020		New post holder started in post May 2019 researching current engagement groups

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Improvement Area	Actions	Success Measure(s)	Lead	Governance Forum	Timescale	RAG	Progress Update
	SEND/ to ensure we are using the feedback provided to evolve our quality assurance framework						
4. Quality of Provision	Review Engagement strategy with CAPA to develop greater reach of service	CAPA Action Plan	Strategic Lead, Specialist Provision	SEND Development Board	Feb 2020		Initial discussions taken place with planning to increase reach of service.
5. Engagement with children/young people	New pupil/student Engagement Strategy and Implementation Plan to be developed.	Strategy, Engagement Plan that has been co produced by young people	Strategic Lead, Specialist Provision	SEND Development Board & Thurrock's Youth Cabinet	Feb 2020		Initial scoping discussions underway
6. Quality of provision- out of borough	Process of out of borough visits and quality assurance of placements to be strengthened as a part of commissioning activity including details in	100% of all out of borough provisions are visited utilising the quality assurance framework	Strategic Lead, Specialist Provision	SEND Operational Group	March 2020		New process of out borough visits and quality assurance is being developed linked to work across other areas with the Education & Skills directorate

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Improvement Area	Actions	Success Measure(s)	Lead	Governance Forum	Timescale	RAG	Progress Update
	specifications.					🟥	
7. Quality of provision- out of borough	Review list of all out of borough placements and planning schedule to ensure all placements are monitored annually including quality assurance process.	List reviewed on a monthly basis – all out of borough placements will be visited once a year	Strategic Lead, Specialist Provision	SEND Operational Group	Oct 2019	🟧	Initial out of borough list has been reviewed. Specialist placement visits planned one completed.
8. Quality of provision – out of borough Commissioning of provision in independent NMSS	Introduce new KPI monitoring framework for all independent schools through a commissioning framework. Develop new monitoring visit schedule for all independent schools and implement monitoring for 2019/20	KPI's developed linking with national best practice	Strategic Lead, Specialist Provision	SEND Operational Group	Dec 2019	🟥	Review of National Contract specifications underway

Improvement Area	Actions	Success Measure(s)	Lead	Governance Forum	Timescale	RAG	Progress Update
						 	
9. Commissioning of provision	Review of all service level agreements for local provisions to be carried out ensuring all are updated with appropriate KPI's in place. Implement the Integrated Commissioning Framework for SEND.	KPIs informs information re quality of provision	Strategic Lead, Specialist Provision	SEND Operational Group	March 2020	 	New SLA for inclusion bases underway A refresh of the commissioning process is underway
10. Commissioning of provision	All post 16 provisions have gone through commissioning/procurement process	Post 16 training has gone through commissioning process	Service Manager Post 16	SEND Operational Group	Dec 2019	 	This is currently being reviewed and a report will be provided in October 2019
11. Effective Governance	Audit of provision to be reported to SEND Development Board	QA of provision has senior management oversight	Strategic Lead Specialist Provision	SEND Development Board	July 2020	 	

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Significant weakness 3: EHC plans and the annual review process are of poor quality. The local authority has no system in place to make sure that relevant professionals and services are notified when EHC plans need reviewing or updating. Professionals are not routinely informed of requests to submit written information within specified timescales. Too often, EHC plans are out of date and do not accurately reflect the needs or views of children and young people, or the views of the families. The information from EHC plans and annual reviews is not used to inform the commissioning of services, particularly, but not exclusively, for young people between the ages of 19 and 25 years.

Aim of this programme of work

To ensure that the Local Authority and other partners produce a plan that clearly articulate the needs of the child/young person having taking into consideration the voice of children/young people. Annual review to be completed within timeframes and clearly reflect the views of children/young people, parents/carers and educational providers.

KPI's / Targets for assessing overall success of the programme

EHCPs:

- Improved staffing capacity to meet statutory requirements
- Strengthening management oversight to ensure that we are clearly sited on EHCP progress
- Developing or revising the QA framework (to include practice standards and parent feedback and feedback from young people)
- Training of staff: e.g.
  - (i) caseworkers in the SEND team on how to successfully bring out the key point from specialist and other assessments to ensure this information is an integral part of the Plan as well as being included in the appendices)
  - (ii) social care staff
  - (iii) health staff
  - (iv) SENCOs

Increase in EHCPs completed within 20 weeks from the 2018 baseline

Increase in new EHCPs that meet standards established in the new QA framework (baseline date January 2020) when the QA framework will be operational

% of parents/carers who report on the feedback form that:

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- They felt fully involved in the process

- They felt the communication was good

- They felt the EHCP accurately reflected their child's needs

- They felt the outcomes were good

- They felt the provision would meet their child's needs

Feedback from education establishments:

% who felt the EHCP accurately reflected needs

% who felt the outcomes were clear

% who felt the EHCP would improve access to teaching and learning and improve progress

Review of EHCPs

% of EHCPs that were reviewed within required timescales (baseline = % for secondary transfers, % of post 16 transfers, % others)

% of EHCPs finalised within 12 weeks of the AR meeting where the decision taken was to amend the Plan

% of parents/carers who reported that:

- They were fully involved in the review

- They were satisfied with the outcome

- They were fully involved in the preparing for adulthood transition

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Improvement area	Actions	Success Measure(s)	Lead	Governance Forum	Timescale	RAG	Progress Update
1. Quality of service – review of the post 16 local offer	Identify LAs with best practice in SEND post 16 and arrange a meeting Work closely with the Department of Education to identify area of good practice	Strategy in place	Service Manager Post 16	SEND Operational Board. SEND Development Board	Oct 19		A review is currently being undertaken
2. Quality of EHCPs	Recruit to vacant post – Tribunals and QA manager role –	QA work is well managed	Strategic Lead School Effectiveness/SEND	SEND Operational Board. SEND Development Board	Sep 2019		Advert to go out in September
3. Quality of EHCPs	Establish Quality Assurance Audit schedules to include monthly sampling of new EHC Plans by multi agency group including	75% of plans are judged to be good or better at audit in the first year with this moving to 100% in year two	Strategic Lead, Specialist Provision	SEND Operational Board. SEND Development Board	July 2020 July 2021		Outline discussions held with partners regarding meetings. Schedule of meetings to be confirmed starting [t] July

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Improvement area	Actions	Success Measure(s)	Lead	Governance Forum	Timescale	RAG	Progress Update
	Education, Health and Social Care managers.				2020		
4. Quality of EHCPs	Key Issues report to be circulated to Operational SEND lead following monthly audit meetings – to inform learning and development for staff.	Plans are improved and they offer opportunities for engagement with both parents/carers and children and young people	Strategic Lead, Specialist Provision	SEND Operational Board. SEND Development Board	Dec 2019		Initial discussions taken place
5. Quality of EHCPs	Develop and implement new guidance for completing all sections of EHC plans	Guidance checklist, New EHC plans linked to the national good practice standards	Strategic Lead Specialist Provision Strategic Lead School Effectiveness/SEND	SEND Operational Board .SEND Development Board	Sep 2019		Research underway on regional, national quality assurance checklists
6. EHCP annual review process	Improve the process for EHCP annual reviews, ensuring a	Quality assurance audits report on improvements	Service Manager Post 16	SEND Operational Board. SEND Development	March 2020		Initial review is currently being actioned

Improvement area	Actions	Success Measure(s)	Lead	Governance Forum	Timescale	RAG	Progress Update
	system is in place to notify relevant professionals and services and that professional are routinely informed of requests to submit written information within specified timescales Improve Information process flow between Health and SEN team	to quality of EHCPs The correct professional contribute towards plans and annual reviews Plans are improved as more joint up information is included	Strategic Lead School Effectiveness & SEND Health/ Strategic Lead School Effectiveness & SEND	Board			
7. SEND Team - EHCP & Reviews	Meet with each caseworker and manager to identify immediate and long term training needs	Improved practice, reduction in complaints, timescales met	Strategic Lead School Effectiveness/SEND	SEND Operational Board. SEND Development Board	May 2019		First 6 training sessions planned - 1st delivery 12 June then every two weeks
8. Caseworker development	Improve Information	Plans are improved as	Service Manager		Dec 2019		

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Improvement area	Actions	Success Measure(s)	Lead	Governance Forum	Timescale	RAG	Progress Update
	process flow between Health and SEN team	more joint up information is included	Post 16			🟩	
9. SEND EHCP & Reviews 10. Practice standards	Develop high quality, effective practice standards and processes and ensure all staff are trained	100% of emails and calls are responded to within 5 days. Reduction in complaints	Strategic Lead School Effectiveness/SEND Service Manager Post 16	SEND Operational Board. SEND Development Board	Oct 2019	🟧	Draft standards have been developed.
11. EHCP & Reviews 12. Caseworker knowledge and skills	Identify an external provider to train caseworkers in specialist knowledge. Develop and deliver bi-weekly training programme for all case workers, managers and admin	100% of EHCPs are fit for purpose and written in-house and accurately reflect the views of CYP and their families. EHCPs reflect accurately the needs or views of CYP / families	Strategic Lead School Effectiveness/SEND Service Manager Post 16	SEND Operational Board. SEND Development Board	July 2020	🟥	Training in place

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Improvement area	Actions	Success Measure(s)	Lead	Governance Forum	Timescale	RAG	Progress Update
	Review current processes and development improved processes and systems	Professionals are routinely informed to submit reports within timescales				🟥	
13. EHCP & reviews	All caseworkers to undertake Nationally recognised qualification for casework training.	All staff achieve L4 and are better equipped to undertake casework	Strategic Lead School Effectiveness/SEND	SEND Operational Board. SEND Development Board	July 2020	🟧	3 staff currently on course
14. EHCP & Reviews	Improve website information with clear processes, timelines, lines of responsibility clearer	Reduction in calls and complaints re communication. Improved customer service	Strategic Lead School Effectiveness/SEND	SEND Operational Board. SEND Development Board	Dec 2019	🟥	
15. EHCP & reviews	Case management process to be reviewed and redeveloped to include the outcomes of	Outcomes of panels are notified in a timely and consistent manner.	Strategic Lead School Effectiveness/SEND	SEND Operational Board. SEND Development Board	Dec 2019	🟧	

Improvement area	Actions	Success Measure(s)	Lead	Governance Forum	Timescale	RAG	Progress Update
	review are managed via emails and all panels.					🟧	
16. EHCP & Reviews	Improve the process for pupils with EHCP new to the borough.	All departments are notified at the same time and systems are updated	Strategic Lead School Effectiveness/SEND Service Manager Post 16	SEND Operational Board. SEND Development Board	Dec 2019	🟧	
17. Feedback informs the Commissioning of services	Develop a systematic process for strategically collecting information from plans and reviews to inform the JSNA and commissioning of services	Services commissioned meets the needs of all children and young people	Strategic Lead School Effectiveness/SEND Service Manager Post 16	Commissioning team SEND Operational Board. SEND Development Board	April 2020	🟥	

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