

Gloucestershire Special Educational Needs and Disabilities (SEND) Peer Challenge

25th to 28th April 2023

Feedback Report

1. Executive Summary

Leaders have worked hard over the last 18 months to improve SEND services and engage with partners and the self-assessment demonstrates that senior leaders have a good grasp of what improvements still need to take place. The pace and depth of improvement needs to accelerate even further to ensure that necessary improvements are consistently implemented across the local area. Improvement plans need to be driven with all partners sharing responsibility, in particular with the Integrated Care Board (ICB) following through on its commitments to equal leadership with the County Council.

There are some good examples where services are effective and have impact for children and young people's experience and outcomes. This was particularly evident in Early Years Services, the Advisory Teaching Service, Virtual School and in the Employment Pathway for young people.

The commitment of staff in all services was clearly evident, with high levels of passion and determination to meet the needs of children and young people.

There is a clear commitment to working with parents, carers and children and young people and the peer team were able to evidence pockets of good practice. Co-production is included in the workforce principles, but capacity is impacting on the ability to do this consistently resulting in co-production not being fully embedded in all services, from individual EHC Plans through to strategic planning in Gloucestershire.

Whilst there is a joint commissioning team in place for the local authority and ICB the joint commissioning process and joint funding would benefit from being further developed.

Workforce across the system needs to have an increased level of focus, including where there are challenges in recruitment and retention. Staff in schools, children and young people and adult services would benefit from a comprehensive SEND training programme to understand more fully what is expected of them and ways in which they need to contribute to the SEND process.

The High Needs Block funding is in significant deficit, and we found that this was not due to any poor management, rather it is a consequence of the national funding formula and the underfunding of SEND for Gloucestershire. Nevertheless, there is a need for significant additional investment across the SEND system, including in the statutory assessment service and Educational Psychology Service. SEND Caseworker caseloads are particularly high and this is having an adverse impact on the quality and timeliness of EHC Plans and Annual Reviews. An enhanced recruitment and retention package for staff is likely to assist with filling vacant posts and is likely to significantly help address workforce pressures. The use of suitably trained Education Psychology Assistant posts to support SEND transformation may also be worth exploring.

There is also a need to ensure there are sufficient SEND placements in special and mainstream schools and other settings, which is not currently the case.

Senior leaders will need to assure themselves that there is sufficient capacity and funding to deliver the planned improvements. Senior Leaders also need to enhance communication across the local area in relation to its SEND vision, key expectations, and improvements – this includes with both parents and carers and frontline staff.

2. Key Recommendations

There are a range of observations and suggestions within the report which the Peer Team hope will offer practical actions for the local area in addition to the conversations which took place during the week on site. The following are the peer team's key recommendations to Gloucestershire County Council and Gloucestershire Integrated Care Board:

1. **Co-production needs to be a fourth foundation to the SEND Strategy** - This will help ensure that children, young people, parents and carers are more visibly involved, and their voices are central both within individual plans for children and young people, and becoming a 'golden thread' through to strategic planning including new service and policy developments.
2. **A multi-agency recovery plan needs to be put in place to improve the quality and timeliness of Statutory Assessments and Annual Reviews** – This is required to ensure that EHC Plans are comprehensive and incorporate relevant health and care provision in addition to education. There is a need for further investment to address the growing pressures in order to produce plans in accordance with statutory requirements.
3. **Development of a comprehensive SEND communication and engagement strategy across the local area is needed** - It is essential that staff across all sectors have a stronger awareness and understanding of the SEND vision in Gloucestershire and what is expected of them.
4. **Ensure the SEND Improvement Plan is comprehensive, deliverable, and tracked with real rigour. Milestones and impact measures to be included** – The pace and consistency of delivery of the Improvement Plan needs to be enhanced and owned equally across the whole partnership. This should include addressing workforce shortfalls and recruitment and retention across the whole system.
5. **Review of action plans to address waiting lists for the neurodevelopmental pathway as a system response within SILAP** – There are significant delays in children being able to access neurodevelopmental services which needs to be addressed.
6. **Develop a more comprehensive sufficiency plan for specialist places** – Including delivering on the commitment to one new Special School and following through on potential plans for increasing the number of places in Resource Provisions in mainstream schools.
7. **Work regarding the Local Offer and what is available for CYP whilst on waiting lists is required** – Families need to be clear about what services they can access whilst they are waiting for assessment and diagnosis and this needs to be effectively communicated to them.
8. **A whole system and role specific SEND training plan for children and young people and adult services and schools would assist staff to gain an improved awareness of what is expected of them and SEND team functions** – The peer team found that there are key roles such as SENCO's and other staff who would benefit from role specific training and ongoing support to improve their

knowledge and understanding of SEND systems and how to maximise their effectiveness. There was also evidence of a general lack of awareness of SEND across a range of CYP and adult services.

9. **Consideration needs to be given to appoint to newly defined roles such as Designated Social Care Officer, Communication Officer, and Transformation Lead** – These are key roles which would greatly enhance SEND delivery.
10. **Leaders need to develop a clear and comprehensive investment plan across the local area if the necessary improvements for children and young people in Gloucestershire are to be delivered** – Senior Leaders need to satisfy themselves that they can address shortfalls in service delivery and can fully deliver the improvements required within health and local authority services. The Peer Team felt this was unlikely to happen without significant additional investment to address the high workload of SEND caseworkers, development of additional special education placements across all areas and health provision.
11. **The development of a joint commissioning strategy/plan with a focus on SEND** – This would assist with determining priorities for joint funding of services.
12. **The improvements across the local area should align with the Delivering Better Value programme** – Evidence from DfE reviews suggests that Local Authorities with sufficient case workers have lower overspends as risks and issues in the system are dealt with pro-actively rather than reactively and thereby avoiding reliance on high-cost packages of support or use of the INMS market to supplement SEND Sufficiency.
13. **Leaders need to consider the development of systems to give a single view of the child** - This could include alignment of SEND and social care records or other multi-agency processes to support this way of working.

3. Summary of Peer Challenge Approach

The fundamental aim of a peer challenge is to help councils and their partners reflect on provision in their local area for children and young people with special educational needs and/or disabilities, in consideration of the Children's and Families Act 2014, the Equality Act 2010 and the Special Educational Needs and Disabilities Regulations 2014, SEND Code of Practice 0-25 2015 and new Ofsted/CQC Area SEND Inspections Framework and Handbook. This was a focused peer challenge using the LGA Peer Challenge Manual for SEND as well as the Council's specific key lines of enquiry.

It is important to remember that the peer challenge is not an inspection; it provides a critical friend approach to challenge the Council and Integrated Care Board in assessing its strengths helping to identify areas for improvement. The approach involved reviewing the documentation and data provided; reviewing a sample of education, health, and care assessments, plans and annual reviews; and meetings with a broad range of senior leaders, managers, practitioners from a range of education, health and social care services, schools and settings, parents and carers, and children and young people. It is important to recognise that the findings are based on a range of evidence-based activity and the peer challenge reflects what the peer team read, observed and heard.

Gloucestershire County Council and Gloucestershire Integrated Care Board are encouraged to reflect on what the findings mean in relation to the local area as a whole and how partners, schools, parents and carers and young people can be involved in the improvement work relating to the peer challenge.

The Peer Team

Peer challenges are delivered by experienced senior officers. The make-up of the peer team reflects the focus of the peer challenge. Peers were selected on the basis of their relevant experience and expertise and their participation was agreed with the Council.

The peers who delivered the peer challenge for Gloucestershire County Council and Gloucestershire Integrated Care Board were:

- **Lead Peer** – James Thomas DCS and Deputy Chief Executive, London Borough of Tower Hamlets.
- **SEND Peer** – Mary Jarrett Head of Integrated SEND, London Borough of Haringey
- **SEND Peer** – Duane Chappell Head of Service, Strategy and Commissioning Manager, SEND Inclusion and Education Entitlement Services, Warwickshire County Council.
- **Health Peer** – Julie Hoodless, Designated Clinical Officer for SEND, NHS Cheshire and Merseyside Integrated Care Board.
- **Off-site EHCP Review Peers** – Richard Holland and Helen Kenward, LGA
- **Challenge Manager** – Cliff James, LGA

Peer Challenge Process

The peer team prepared by reviewing a range of strategic and performance documents and information to ensure they had a good grasp of the challenges facing the Council, ICB and Local Area. This included a detailed self-assessment of SEND services for Gloucestershire. Two offsite peers reviewed 16 children and young people who have EHCPs and covering a range of ages from early years through to post 18 and prepared a report of their findings for the peer team and the Council in advance of arriving on site. This has already been shared with Council.

The team then spent four days onsite at Shire Hall in Gloucester, during which they:

- Gathered information and evidence from 28 focus group meetings, visits to schools and sites in the local area and additional research and reading.
- An additional 4 EHC Plans were reviewed whilst on site.
- Met with a range of teachers, education, health, and social care professionals.
- Gained the views of parents and carers and children and young people.
- Collectively spent more than 300 hours determining findings.

This report provides a summary of the peer team's findings. It builds on the feedback presentation provided by the peer team at the end of their on-site visit 25th – 28th April 2023. By its nature, the peer challenge is a snapshot in time.

4. Scope and Focus of the Peer Challenge

In advance of the team arriving on-site Gloucestershire identified four key themes they wanted the team to focus on in addition to the key areas identified in the LGA SEND Peer Challenge Manual and Handbook. The peer team were also very conscious of the impact of the Ofsted/CQC Area SEND Inspection Framework and Handbook and the 11 Evaluation Criteria which will be used when SEND services in Gloucestershire are next

inspected. The team therefore applied these criteria in all their discussions and when considering documents and cases.

Themes:

- Leadership and Governance (with a focus on shared responsibility, engagement and accountability)
- Parent/Carer, Children and Young People's Voice (informing strategic planning)
- Joint Commissioning arrangements
- Transitions

Additional Themes from LGA guidance and the new Ofsted/CQC Area SEND Inspections Framework and Handbook:

- Identification of children and young people who have special educational needs and /or disability.
- Assessing and meeting the needs of children and young people who have special educational needs and /or disability.
- Outcomes for children and young people who have special educational needs and /or disabilities.
- 11 Evaluation Criteria from the new Ofsted/CQC Area SEND Inspections Framework and Handbook.

5. Main Findings

Leadership and Governance

Senior leaders in the local area demonstrated a growing understanding of the SEND challenges they are facing, and this is reflected in the self-assessment prepared by the Council. Leaders across the whole system agree that there has been a greater momentum to achieve improvement over the last 18 months with increased evidence of partnership working.

The peer team felt that Gloucestershire's SEND self-assessment would benefit from being more closely aligned to the new Ofsted/CQC Local Area Inspection Framework as this would be beneficial for any future inspection of SEND services in the local area.

The peer team identified a strong commitment from the local authority and health partners at a strategic level to engage in collaborative working with children and young people with SEND, parents and carers, schools and education settings and other key stakeholders. The three key foundations that underpin the Strategy for Improving SEND Services in Gloucestershire were considered to be appropriate by the team, but the Strategy would benefit from co-production being added as a fourth key foundation.

There was clear evidence of a strong commitment and dedication from frontline practitioners and managers in Gloucestershire to meet children's needs. The peer team were also able to evidence some good and exceptional practice such as the Employment Pathway for young people with SEND, the early years SEND offer, the Advisory Teaching Service and the Virtual School.

The voices of children and young people needs to be much more evident in all aspects of SEND work and reflected as a clear golden thread in all activity from individual CYP's plans through to strategic planning and commissioning of services.

The pace and consistency of the SEND improvement plan needs to be enhanced with greater rigour and timescales for achieving changes which are jointly owned equally across the partnership.

There was clear evidence that the Statutory Assessment Team in Gloucestershire is under significant pressure which is impacting on the quality and timely processing of EHC Plans and Annual Reviews. Plans are primarily education focused with limited evidence of health or social care needs being considered unless the child has a significant disability. Caseloads of SEND caseworkers are too high and their ability to process EHC Plans and Annual Reviews in a timely and comprehensive manner is compromised.

The engagement of local authority children's and adult social care in SEND beyond specialist children with a disability service is limited and parents appear to find it hard to navigate and access social care services which would assist them to better meet the needs of their child.

Gloucestershire's Integrated Care Board is co-terminus with the local authority and needs to demonstrate a much greater level of commitment to prioritising SEND by establishing and appointing to key roles including an executive lead of SEND and a senior responsible officer for SEND within the ICB to oversee compliance with ICB SEND statutory functions. The newly appointed Designated Clinical Officer (DCO) will require sufficient capacity and authority to lead improvement across the whole health system. In addition, the ICB needs to ensure appropriate governance, with SEND represented on key board agendas within the ICB to allow for the effective escalation and management of best practice.

The peer team felt that there was a lack of consistent knowledge and awareness of SEND requirements across the whole system and that a comprehensive and mandatory SEND training programme is required for both children's and adult services which incorporates the graduated approach and embeds the skills necessary to support children and young people at an early stage when needs are first identified.

Staff recruitment and retention is also a major issue across the whole system and leaders need a focused plan to address workforce shortfalls and staff development pathways to help with succession planning.

Communication across the local area needs to be enhanced to ensure Gloucestershire's vision for SEND services is fully understood by the entire workforce and parents, carers and children and young people and that staff have a good understanding of what is expected of them. Communication can also be improved in sharing a clear understanding of the improvement journey and progress with this.

Senior leaders need to satisfy themselves that they have the capacity to fully deliver the improvements required within health and local authority services. Whilst there has been recent further investment the peer team came to the view that there was a need for further significant investment in SEND services to fully achieve the required improvements to take place across the whole local area.

The Voice of Parent and Carers and Children and Young People informing Strategic Planning

There was insufficient evidence that the principles underpinning co-production are consistently understood and embedded across the partnership and in practice across the local area. Co-production and engagement needs to be widened and reflected throughout the whole SEND system throughout from EHC plans and Annual Reviews to strategic plans.

Parents, carers and children and young people are keen to be involved in the development of services and local solutions and this needs to be better facilitated. The SENDIASS offer is viewed by parents and carers as helpful and supportive. The recent investment during 2022/23 has helped achieve this and further investment would assist the authority of address the growth in demand for SEND services.

The peer team found some good evidence of engagement via the Parents and Carer Forum, Alliance and other groups and committees but ensuring the voice of parents and carers and young people has a consistently high profile in the SILAP would be beneficial.

The local authority is clearly committed to maintaining a dialogue with parents and carers, but further steps are needed to build parental confidence in an inclusive and graduated approach to meeting children with SEND needs across the County.

The peer team found some good examples and practice of engagement with young people in co-producing local authority and health services such as the work undertaken by Future Me and Young Gloucestershire, and other Community and Voluntary Sector (CVS) organisations demonstrated particular strength in engaging with young people in the co-design and delivery of services. This should be celebrated and built upon across the local area.

Joint Commissioning Arrangements

The JSNA provides a robust foundation for the development of joint commissioning arrangements and the local authority and Integrated Care Board have established an integrated commissioning team. However senior leaders acknowledge that there is a need to increase the pace and range of jointly commissioned services in Gloucestershire.

The development of a joint commissioning strategy/plan with a clear focus on SEND and aligned to the improvement plan would be beneficial and provide focus for ongoing work.

The peer team identified good evidence of joint commissioning arrangements for post 16 employment work supported by the ICB and good joint arrangements for the provision of short breaks commissioning across CYP, Adult and the ICB. These offer examples which could be built on in other areas.

Gloucestershire's SEND strategy 2019/2024 would benefit from being updated with a clearer focus on growth link to the overall Sufficiency of School Places Strategy. The range of post 16 learning provision also needs to be further developed.

Transitions

The peer team found good evidence of support and creative work being offered to prepare young children for mainstream school and other early years settings. There is a need however to embed transition arrangements more firmly from early years provision to ensure that mainstream schools build upon the work done in early years settings across the local area.

Phased transfers across all key stages, whilst improving, requires a targeted approach to ensure they are effective. This would benefit from being linked to the sufficiency planning.

Planning of post 16 and post 18 SEND provision in Gloucestershire is limited as is the range of provision available. This is an area where further investment is required. The peer team found that the post 16 Employability Pathway to be good and well evaluated with clear impact measures. The voluntary and community sector, and in particular Young Gloucestershire, is effective in engaging with young people at risk of becoming NEET.

Where young people have a clearly identified significant disability transitions to adult services appear to be well managed and the Transitions Operational Group (TOG) brings together adult's and children's services and tracks all cases. A new dedicated transitions worker is due to be appointed and will be based in the DCYP team to further support transition preparation to adult services.

Transitions planning does not appear to be working well for vulnerable children and young people who have not got a significant disability although the Virtual School is providing an excellent multi-disciplinary approach to transition planning particularly for children in the care system.

There is very limited understanding and knowledge of SEND requirements within adult health and social care services which inhibits effective transition planning which will be helped by the training programme previously mentioned.

Additional considerations from the LGA guidance and the new Ofsted/CQC Area Send Inspections Framework and Handbook.

The early years education and health offer was felt by the peer team to be particularly strong with young children with SEND being identified at the earliest opportunity. The Early Notifications process works well and has been effectively embedded. There is excellent evidence of parental and child engagement and services are tailored to meet the needs of early years children with SEND.

There is good evidence of use being made of audits and learning from retrospective case tracking in early years and the methodology used in early years could be adapted and applied across the whole SEND system. The new focus on a multi-agency quality assurance framework for statutory assessment is also very promising.

The Advisory Teaching Service is highly valued by schools and should be used to help embed positive SEND practice in schools and other settings. The Virtual School is having a positive impact on assisting schools to provide a focus on Children in Care (CIC) with SEND and its remit has been extended to include other vulnerable young people which will be beneficial. The Virtual Schools model of using pupil premium is particularly innovative and effective.

The peer team felt the new high needs banding and top up funding is likely to have a positive impact on SEND sufficiency and will help ensure children and young people more readily access what is required to support them.

The recognition that most provision in special schools is good or outstanding is a significant advantage. The increased demand for special school places has however created waits to access health provision in these settings which needs to be addressed.

Waiting times for therapy services in the community is generally good despite challenges in capacity however waiting times for neurodevelopmental pathways are too long and need addressing. There is a pathway to access ADHD and ASD assessment, but referrals are high due to the graduated pathway not being effectively managed.

The peer team felt that schools and other settings would benefit from specific training in relation to the graduated approach. The graduated pathway is not currently being applied consistently by schools and a clear framework of what is required would be beneficial.

Advice received from privately instructed therapists can vary compared with the assessed needs and recommended provision by NHS practitioners. This is impacting on EHC Plan content and leading to an increase in appeals to a tribunal.

SENCO's would benefit from increased access to ongoing support and training to fulfil their roles more effectively.

You will want to explore the functionality of the EHC Plan Portal further to establish what can be done to enhance the user experience.

The Education Psychology Service is under pressure and has limited resources to meet the level of demand placed on the service. Attention will need to be given to recruitment and retention of Education Psychologists as the timeliness of Education Psychology Reports impact directly on the statutory assessment 20-week timescale. Whilst the service is focussing on this they are unable to deliver work to embed the graduated response, thereby exacerbating the sense of the SEND system being reactive rather than pro-active.

6. Next Steps

The Local Government Association would be happy to discuss how we could help you further through the LGA's SEND Improvement Advisor, Barbara Peacock, Barbara.a.peacock@gmail.com and Claire Burgess, the Children's Improvement Adviser telephone 07854 407337 or email claire.burgess23@gmail.com

Thank you to everyone involved for their participation in this Peer Challenge. In particular, please pass on thanks from the peer challenge team to Clarisse Forgues and Sian Jones for help prior to the peer challenge and during the on-site phase.



James Thomas

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