

# **Dudley Local Area SEND Written Statement of Action**

# 26<sup>th</sup> November 2019



#### Introduction

Ofsted and the Care Quality Commission (CQC) conducted a joint inspection of the local area of Dudley between 20th May 2019 and 24<sup>th</sup> May 2019, to judge the effectiveness of the area in implementing the disability and special educational needs reforms as set out in the Children and Families Act 2014. In particular how well we identify and meet the needs of Children and Young People (CYP) with Special Educational Needs and Disabilities (SEND), as well as the outcomes they achieve. Whilst the Inspectors identified a number of strengths, they identified significant weaknesses and areas of concern which were set out in a letter published on 8<sup>th</sup> July 2019. These were:

- 1. Improvement strategies are not embedded and they have not had a marked impact on improving outcomes for SEND children and young people.
- 2. The needs of children and young people with SEND have not been accurately identified or moderated over time.
- 3. A strategic approach to assessment and provision mapping in Dudley is lacking. There is poor co-ordination of assessment information between agencies resulting in fragmented information systems.
- 4. Joint commissioning is underdeveloped. It is not always informed by accurate analysis of performance data, which is required to understand areas of need and gaps in current service provision.
- 5. The DMO has insufficient capacity to promote SEND agenda across health providers.
- 6. Co-production with parents is weak. Co-production at a wider strategic level is underdeveloped.
- 7. There is a great deal of parental dissatisfaction. The passion and commitment of the various parent groups has not been harnessed. Many parents feel disengaged with the system.
- 8. There is a lack of understanding about inclusion in Dudley. The local area needs to change the culture and develop stakeholder confidence.
- 9. The published local offer is poor. It is underused and difficult to navigate.
- 10. EHC plans are often of a poor quality. They are not outcome-focused and often lack information about health and social care. Completed EHC plans are often not shared with early years settings.
- 11. Pupils with SEND make slower progress than other pupils.
- 12. Pupils with SEND have higher absence and exclusions rates than other pupils.
- 13. There is a lack of local provision post-19 for young people with the most complex needs.
- 14. Too few young people with SEND progress into employment.

As local leaders from education, health and social care we were disappointed with this outcome but recognised many of the shortcomings, both in failing to address certain key areas and the lack of pace in tackling others. Whilst we had put plans into place to address some of these, we recognised that these plans had been either ineffective or too slow.

In response to these concerns a wide ranging and robust improvement programme is being implemented across both DMBC and the CCG to make the changes and improvements to which we are committed. We are determined to work in partnership to transform the way that we work with children with SEND and their families. That means creating a new relationship with parents/ carers which is open and transparent, and characterised by increased levels of trust, a commitment to genuine consultation, partnership and co-production. This approach will characterise every area of our improvement journey (please see co-production model and communication strategies in appendix A).

This relationship will be underpinned by a new ambitious structure and practice model that we will roll out across all SEND services and will look at the way that we work with all children with SEND examining how we can create a unified high quality offer that makes sense for all children and YP.

We are also determined to re-define our relationship with schools to ensure that those most vulnerable pupils are supported to achieve the best outcomes, in a genuinely inclusive and holistic manner. We will also eliminate the variation and fragmentation in commissioning practice with involvement of CYP and their families to ensure a consistent level of service quality.

#### Lead Officers

Caroline Brunt-Chief Nurse, Dudley CCG Neil Bucktin-Director of Commissioning, Dudley CCG Helen Ellis- Interim Assistant Director for Education, SEND, Family Solutions & Youth Dudley MBC Catherine Knowles-Interim Director of Children's Services, Dudley MBC

#### **Co-Writers: Written Statement of Action**

Linda Cropper-Children's Commissioner, Dudley CCG Helen Ellis-Interim Assistant Director for Education, SEND, Family Solutions & Youth Dudley MBC Neil Hoskinson- Lead for Education Outcomes, Dudley MBC Catherine Knowles-Interim Director of Children's Services, Dudley MBC Inderjit Lahel-Head of Integrated Commissioning, Performance and Partnerships, Dudley MBC

#### **Additional Contributors**

Greg Barbosa – Intelligence Manager, DMBC Mark Barnett – Lead for Connexions/Worklessness, DMBC Dawn Bevington – Team Leader, Dudley Disability Service, DMBC Len Brazier - Interim SEND Consultant, DMBC Shelley Brooks – Senior Account Manager, Communications and Public Affairs, DMBC Nicki Burrows-Strategic Lead for Children's Services, Dudley CVS Gill Cartwright - Headteacher, Old Park Special School Tina Cartwright – Parent Carer Forum Representative Andrea Crew – Chief Officer, Health Watch Dudley John Cunningham - Head of Post 16 Skills & Employment, DMBC Santokh Dulai – Head of Dudley Disability Service, DMBC Iain Estell – Director of Quality & Equality, King Edward VI College Dawn Goodall – Principal Education Psychologist, DMBC Deborah Harkins- Chief Officer Health and Wellbeing (Director of Public Health) Wendy Hilary-Patten, Senior Health Improvement Practitioner, DMBC Dr Timothy Horsburgh - Clinical Lead C & YP / Designated Medical Officer SEND, Dudley CCG Amanda Jackson – Paediatric SLT Manager, BCPFT Bal Kaur – Head of Service Children and Young People's Public Health, DMBC Andrew Kinsella – Senior Information Analyst, DMBC Paul Klein-SEND Programme Manager, DMBC Laura Jones-Moore – Senior Principal Accountant, DMBC Paulette Morris – General Manager Children's, BCPFT Donna Roberts – Children's Development Officer, Dudley CVS Julia Simmonds - Service Manager Strategic Partnership, DMBC Kelly Slade – Strategic Commissioning Manager, DMBC Matt Smith – Head of Business Support, DMBC Jon Stevens - Headteacher, Bromley Hills Primary School Martin Timmins – Chair of Preparation for Adulthood Task and Finish Group Jane Williams – Senior Educational Phycologist, DMBC Steve Wilkinson – Strategic Lead Access and Inclusion, DMBC

#### **Key Partners**

Local Authority Children's Services-Education including SEND and Early Years. Children's Social Care. Family Centres. Adult Social Care. Commissioning, Performance and Partners. Public Health, DMBC

<u>Criminal Justice</u> West Midlands Police Youth Offending Service

Health Black Country Partnership Foundation Trust (Children's) Designated Medical Officer SEND, Dudley CCG Dudley CCG Board Health Watch Dudley NHS Commissioning, Dudley CCG

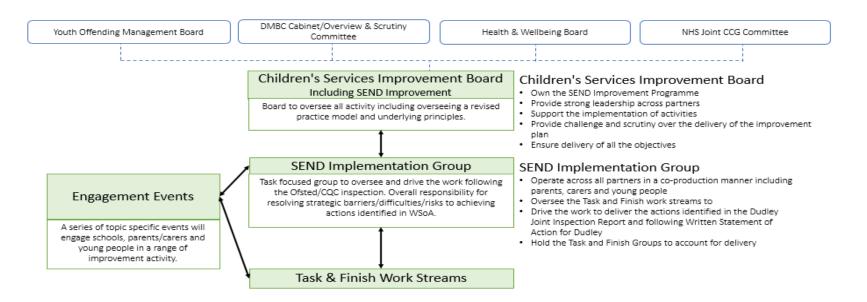
Education & Provision Budget Working Group Chairs and Vice Chairs of Governance Dudley Association of Governing Bodies Dudley School Improvement Alliance Learning Support Service Primary Head Teachers Forum Schools Forum Secondary Head teachers Forum SENCO Forum (Learning Support Service)

Special Educational Needs and Disabilities Information, Advice and Support Service (SENDIASS) Specialist Inclusion Services Special Schools Forum 'Working Together for Change'-Parent/Carer Forum Dudley CVS

#### Governance

We recognised the need to strengthen the governance of SEND within the local area following the Ofsted/CQC inspection and the revised governance structure is shown below in (Fig a). The Children's Service Improvement Board (CSIB) (membership shown in (Fig b) will ensure collaborative working across education, health and social care, and have a strategic overview of services and drive the operational workstreams which have been developed to address each area of significant weakness. The SEND Implementation Group (SIG) reporting to the CSIB is task focused and has the individual task and finish groups reporting progress on a weekly basis together with input from the various engagement events and communications designed to build trust with families across the SEND partnership delivery of SEND services.

(Fig a)



(Fig b)

Current Children's Services Improvement Board Membership (under review in light of governance changes)
Andy Gray, Chief Officer, Dudley Council for Voluntary Services
Caroline Brunt, Chief Nurse, Dudley Clinical Commissioning Group
Catherine Knowles, Interim Director for Children's Services, DMBC
Claire Burgess, LGA Children's Improvement Adviser, West Midlands and South West and Independent Chair of the Board
Councillor Ruth Buttery, Children's Services Cabinet Member
Councillor Anne Millward, Chair of Children's Scrutiny
Councillor Qadar Zada, Group Leader
Councillor Sue Ridney, Shadow Cabinet Member
Derek Lambert, DCI, West Midlands Police
Diane Wake, Chief Executive, NHS Foundation Trust
Helen Ellis, Interim Assistant Director of Education & Early Years, Dudley MBC
Joyce Fletcher, Black Country Partnership NHS Foundation Trust
Kevin O'Keefe, Chief Executive, DMBC
Paul Kingston, Independent Safeguarding Chair
Rosie Musson, Dudley and Walsall Mental Health Trust
Sally Bourner, Chief Superintendent, West Midlands Police
Santokh Dulai, Head of DDS Service, DMBC
Sarah Goff, DfE Advisor
Shelley Brooks, Senior Account Manager, Marcomms, DMBC
Siobhan Jordan, Interim Chief Nurse, NHS Foundation Trust
Su Vincent, Designated Nurse for Safeguarding Children, Dudley CCG
Surinder Sehmbi, Primary School Headteacher
Tracy Taylor, Chief Executive Officer, Birmingham Community Healthcare NHS Foundation Trust

In addition, we have nominated a Senior Responsible Officer (SRO) to oversee each of the fourteen work streams. They will be responsible for ensuring the progress and quality of delivery for each of outcome, objective and action within their work stream.

To support this structure a programme manager has been recruited to specifically manage the WSoA plan and the reporting they provide will show:

- The high level milestones for each objective and when it will be delivered
- The individual owner and RAG status of each objective/action
- The % completion of each task and finish deliverable
- The risks and issues relating to the improvement plan together with their likelihood, impact and mitigation

## Senior Responsible Officer: Helen Ellis-Interim Assistant Director for Education, SEND, Family Solutions & Youth, Dudley MBC

## Area of Significant Weakness 1:

Improvement strategies are not embedded, and they have not had a marked impact on improving outcomes for children and young people with SEND.

- A co-produced SEND Strategy that is owned, shared and delivered through the Children's Service's Improvement Board.
- A SEND action plan which sets out improvements needed across Education, Health and Care ensuring a coherent joined up approach.
- A SEND Strategy which focuses on identifying, sustaining and future proofing joint priorities to improve Children and Young People's outcomes across Education, Health and Social Care.
- A robust Workforce Development Plan which has a clear vision to ensure strategies are embedded and ambition to improve outcomes for Children and Young People in Dudley.

Objective	Actions	Completion Date	Lead Officer	Evidence/Impact.	
A. Agree governance reporting structure	1. Obtain agreement at the Children's Services Improvement Board (CSIB) to report progress against SEND WSoA in order to ensure delivery of project milestones in the short, medium and long term against the project plan.	November 28th 2019	Interim Assistant Director for Education, SEND, Family Solutions & Youth Dudley MBC	<ol> <li>Agreed Terms of Reference.</li> <li>Board minutes show agreement.</li> <li>Evidence of milestones being met and actions being delivered within timescales.</li> </ol>	
	2. Obtain agreement to increase CSIB membership to reflect the SEND improvement strategy i.e. school reps to increase levels of co-operation to improve SEND services.	November 28 <sup>th</sup> 2019	Interim Assistant Director for Education, SEND, Family Solutions & Youth Dudley MBC	1. Evidence of partner's contribution to developing agreed improvements needed across Education, Health & Care into revised strategy.	

	3. Review and agree SEND Implementation Group membership.	October 2019	Interim Assistant Director for Education, SEND, Family Solutions & Youth Dudley MBC	1. Revised & agreed Terms of Reference that includes participation of all relevant stakeholders.
	4. Rigorously monitor and ensure progress of WSoA across the partnership to ensure delivery against timescales, quality and budgetary requirements.	March 2020	Interim Assistant Director for Education, SEND, Family Solutions & Youth Dudley MBC	<ol> <li>Group minutes showing delivery against the programme plan.</li> <li>Evidence of performance against plan success criteria in updates to Children's Services Improvement and other key Boards.</li> </ol>
B. Review current SEND Strategy with partners to identify service delivery improvements.	1.Facilitate a series of workshops with key partners to identify key areas of the current strategy that require review including revisiting the SEND Code of Practice (managing the 2014 changes) 'going back to basics'	December 2019	Interim Assistant Director for Education, SEND, Family Solutions & Youth Dudley MBC	<ol> <li>Production of a gap analysis showing current performance against requirements.</li> <li>Evidence of the areas of review with completion dates.</li> </ol>
	2. Identify key areas for development and create task and finish groups to deliver partnership wide improvements to SEND services.	December 2019	Interim Assistant Director for Education, SEND, Family Solutions & Youth Dudley MBC	<ol> <li>Task &amp; Finish groups set up with agreed terms of reference, measures of success and milestone dates to deliver improvements.</li> <li>Any co-produced improvements have to</li> </ol>

3. Capture parents/carers and young people input and feedback to ensure the strategy is fully co-produced to improve levels of satisfaction of their needs being considered.	December 2019	Interim Assistant Director for Education, SEND, Family Solutions & Youth Dudley MBC	show the resulting measurable improved outcomes for CYP. 1. Reduce the number of parents and carers dissatisfied with how well their views were considered by 50% compared to the April 2019 benchmark by May 2020.
4. Co-produce a communication plan that will encompass all stakeholders to ensure they are updated with the on-going plan and progress of SEND improvements and make provide a means of sharing knowledge, learning and provide feedback.	December 2019	Communications Manager DMBC/CCG	<ol> <li>Clear, relevant and timely communication plan.</li> <li>Feedback from stakeholders shows a reduction of 50% dissatisfied with effectiveness of information communication against the April 2019 baseline by May 2020.</li> </ol>
5. Provide an update on SEND improvement to CSIB to show short term milestones are being met and medium and long term are on track.	February 2020	Interim Assistant Director for Education, SEND, Family Solutions & Youth Dudley MBC	1. Evidence of delivery against agreed timescales and targets in the SEND Improvement project plan.

C. Develop a co-produced revised SEND Improvement Strategy	1. Design an effective feedback process to channel the learning from complaints/compliments received into SEND case officer team's performance.	November 2019	SEND Manager DMBC	<ol> <li>Annual review         <pre>feedback from             workforce shows             evidence of learning             from complaints.</pre> <pre>A process is in place             that confirms the             current baseline of             complaints and the             details of how the             current level of             complaints will be             reduced together with             milestones and dates.</pre> </li> </ol>
	2. Seek external support to develop a workforce development plan in order to capture best practice in its design and development.	January 2020	Interim Assistant Director of Education & Early Years, Dudley MBC	<ol> <li>A clear and robust Workforce Development Plan in place</li> <li>Evidence from annual reviews of the benefits the workforce development plan has enabled.</li> </ol>
	3. Complete the co-production of final workforce development plan with parents and carers to improve their levels of trust with the SEND service.	January 2020	SEND Manager DMBC	1. Decrease in the level of parent/carer dissatisfaction by 50% against the April 2019 baseline by May 2020.
	4. Roll out of the workforce plan across the partnership with mandatory participation (monitored by attendance register) required by key agencies to ensure an improved level of consistency.	February 2020	SEND Manager DMBC	1. Robust training plan in place which is rolled

			out across the partnership. 2. Key stakeholders understand what good
			looks like evidenced by completed feedback forms.
5. Evaluate effectiveness of revised improvement strategy to track improvements in stakeholder satisfaction and outcomes for SEND CYP.	May 2020 January 2021	Interim Assistant Director for Education, SEND, Family Solutions & Youth Dudley MBC	1. Decrease of 50% in Parent and Carer dissatisfaction that their children's needs are being met against April 2019 baseline by May 2020.

# Senior Responsible Officer: Neil Hoskinson-Lead for Educational Outcomes, Dudley MBC

## Area of Significant Weakness 2:

The needs of children and young people with SEND have not been accurately identified or moderated over time.

- Clear early identification of all children that will require additional Health, Social Care or Education support
- 100% of EHCPs accurately match assessment and moderated needs of every pupil so that pupils are placed in appropriate settings
- Provision is regularly reviewed so that the moderated needs of the Dudley SEND Cohort are accurately captured
- Development of additional small bases within mainstream provision, for pupils with ASD or SEMH in particular that mirror existing bases.

Objective	Actions	Completion Date	Lead Officer	Evidence/Impact.
A. Profile the	1. Produce a full Dudley EHC plan database in order to ensure all information	November 2019	Head of	1. Identified
SEND Cohort	is up to date and allowing direct comparison with the levels of the different		Performance	differences between
to test the	categories of need locally to national, regional and statistical neighbour data		Intelligence	the Dudley cohort and
baseline	to support improvements in our performance where relevant.		DMBC	national, regional and
				statistical neighbour data is identified and any explanations explored.
				2. Analysis of the cohort is used to inform future decisions about identification of need so that it is more accurate.
	2. Conduct a systematic review of all EHC plans to ensure that the primary and secondary needs are accurately captured to improve the matching of provision to correctly assess educational and health needs.	April 2020	SEND Manager DMBC	1. The review will provide a measure of current levels of accurate and moderated assessment

			of need as a benchmark. 2. The school survey shows most schools (95%) feel that there has been an improvement in the overall quality of EHC plans for Dudley CYP with SEND since the inspection in May 2019.
3. Review the staff handbook and SENCo training to ensure that the process for annual reviews of EHC plans involves a review of the primary and secondary needs.	February 2020	SEND Manager DMBC	<ol> <li>Reduce the number of parents and carers dissatisfied with the assessment of their child's needs by 50% compared to the April 2019 benchmark (32%) by May 2020.</li> <li>Performance management provides evidence that staff feel more knowledgeable and confident and have a clear understanding of roles and responsibilities six months after the launch of the revised handbook.</li> </ol>

			<ol> <li>Increased reporting of inclusivity needs in schools.</li> <li>Reduce the number of parent &amp; carers stating that their child's needs are poorly assessed by</li> <li>compared to the April 2019 baseline (28%) by May 2020.</li> </ol>
4. Hold a development workshop for all Specialist Support Services to revise the schools guidance document to ensure that schools are able to accurately identify primary and secondary needs.	April 2020	SEND Manager DMBC	<ol> <li>The schools guidance document is an endorsed and agreed working document that sets clear advice for identifying the primary and secondary needs for all pupils with SEND including the process for annual reviews of CYP with EHC plans.</li> <li>New CPD is in place relating to accurate differentiation of need in line with the working document.</li> </ol>
5. Review the system of EHC plan moderation facilitated by the SENCo forum so that schools are able to review their individual EHC plans against other schools.	April 2020	Lead for Educational Outcomes DMBC	1. The review of the EHC plan moderation informs new CPD delivered by the

B. Ensure that SEND provision for Dudley CYP with EHC plans	1. Undertake a diagnostic assessment to accurately identify demand for places in special schools for September 2020 and for future years to ensure that provision matches the required level of need.	November 2019	Lead for Educational Outcomes DMBC	Learning Support Service to support accurate moderation of EHC plans by schools. 2. Analysis of annual reviews provide confirmation that most schools (85%) have attended training and using it to moderate their EHC plans. 1. The assessment provides evidence to agree a plan of the provision required to
with EHC plans is appropriate for their needs.				provision required to meet the current needs within the current SEND cohort and the known and expected levels of demand for future cohorts. 2. The trend of rising numbers of appeals & tribunals against the provision for SEND CYP is stemmed in the year from January 2020 and reduced by 50% in the year from January 2021.

2. Dudley Education Psychology Service (EPS) to confirm the demand for potential new bases for ASD and SEMH pupils within mainstream schools to increase the numbers of relevant settings available.	January 2020	Principal Education Psychologist DMBC	<ul> <li>3. Increase in the number of CYP with EHCP's within mainstream settings to align with the region and statistical neighbours by July</li> <li>2021.</li> <li>4. By July 2020 a target date is set to match the performance of the top quartile of LA's.</li> <li>1. EPS publishes evidenced based business case setting out the demand for ASD and SEMH bases matching provision to need.</li> <li>2. Business Case confirms the current baseline and plans for improvement with targets and milestone dates.</li> </ul>
3. Identify effective SEND provision in the local area, across the West Midlands region and nationally that could be replicated in Dudley to replicate best practice where applicable.	April 2020	Lead for Educational Outcomes DMBC	1. Data map showing the Dudley position in relation to our performance against best practice.
4. Review current arrangements for identifying provision to ensure that there is equity of access and to build confidence in all stakeholders.	November 2019	Principal Education	1. Decrease in parents and carers dissatisfaction by 50%

		Psychologist DMBC	that CYP needs have been met compared to the April 2019 baseline by May 2020.
5. Develop effective and transparent admission criteria and pathways to SEND provision.	January 2020	Principal Education Psychologist DMBC	<ol> <li>100% of all new admission arrangements have been created with inputs from parents and carers.</li> </ol>

# Senior Responsible Officer: Neil Bucktin-Director of Commissioning, Dudley CCG

### Area of Significant Weakness 3:

A strategic approach to assessment and provision mapping in Dudley is lacking. There is poor co-ordination of assessment information between agencies resulting in fragmented information systems.

### **Required Outcomes:**

- An effective approach to strategic assessment and provision mapping in Dudley
- Increased coordination of assessment information between agencies.
- Integrated and shared access to information systems

Objective	Actions	Completion Date	Lead Officer	Evidence/Impact.
A. Ensure all	1. Capture CCG requirements for input in to the early assessment and	March 2020	Director of	1. Appropriate
agencies are	provision process supporting forecasting and planning of commissioned		Commissioning	health needs
involved in the	services.		Dudley CCG	identified in the
assessment				strategic mapping
and provision				and provision of
mapping				SEND services.
process	2. Carry out an audit of assessment of SEND in Dudley schools against the best	March 2020	Lead for Education	1. Production of a
	practice identified in the SEND Code of Practice to produce a gap analysis.		Outcomes DMBC	data map
				identifying our
				areas of required
				improvement.
	3. Carry out an audit of provision mapping in Dudley schools against the best	March 2020	Lead for Education	1. The audit details
	practice identified in the SEND Code of Practice to ensure that they include:		Outcomes DMBC	the use of provision
	<ul> <li>what is delivered and to which pupils</li> </ul>			maps by Dudley
	how success will be measured			SENCOs as an
	the cost of each intervention			overview of the
	a focus on outcomes and skills			programmes and
	which staff are involved			interventions used
				with different
				groups of pupils

			and as a basis for monitoring interventions. 2. Also to show if provision maps are used to differentiate the curriculum for all pupils and not just those identified as having SEND.
4. Produce a CPD offer relating to effective assessment and provision mapping is included in the Learning Support Service training for SENCOs together with the means to provide evidence of the corresponding improvement in assessment and provision mapping.	June 2020	Lead for Education Outcomes DMBC	<ol> <li>Best practice in Dudley schools is identified and shared in SENCOs forum training sessions.</li> <li>There is evidence available showing the impact of the revised CPD in the quality of assessment and provision mapping in schools.</li> </ol>
5. Confirm that the assessments and provision maps are part of the support and challenge carried out by LA officers to ensure that schools are developing an inclusive curriculum and a program for interventions for each SEND group.	September 2020	Lead for Education Outcomes DMBC	1. Schools survey shows that by May 2020 95% are confident in their assessment procedures and accurately recorded details of additional

6. Publish an effective co-produced moderation process with SENCOs so that schools are able to improve the accuracy of assessment and the quality of provision mapping.	September 2020	Lead for Education Outcomes DMBC	or different provision. 2. Survey shows that all schools are using provision maps in their regular discussions with parents & carers about their child's progress. 3. Monitoring of provision maps shows that they contain accurate information, have been reviewed regularly and contain appropriate information from all agencies. 1. Feedback from the SENCOs forum evidences an increasing
schools are able to improve the accuracy of assessment and the quality of	September 2020	Education	1. Feedback from the SENCOs forum

D. Successful			Diversion of	suitability of provision poor compared to the April 2019 benchmark by May 2020.
B. Ensure all agencies are involved in an effective approach to strategic assessment	1. Provide health and education requirements for input in to the revised early assessment and provision process to improve forecasting and planning of commissioned services.	January 2020	Director of Commissioning Dudley CCG/Lead for Education Outcomes DMBC	1. Appropriate health and education needs identified in the strategic mapping and provision of SEND services.
and provision mapping in Dudley that includes effective coordination of assessment information.	2. Agree and establish a joint LA / CCG dynamic risk register to identify SEND (ADH & Learning Disabilities) CYP within the Transforming Care Partnership (TCP) at risk of hospital admission. This is to include the process of reviews for those identified at risk.	February 2020	Director of Commissioning Dudley CCG	<ol> <li>Accurate         <ul> <li>identification of</li> <li>CYP with SEND at</li> <li>risk of hospital</li></ul></li></ol>
	3. Embed a Root Cause Analysis process for those CYP diagnosed with ASD/LD during admission to provide evidence of the reasons why CYP are admitted.	February 2020	Commissioning Manager, Children Young People and Families Dudley CCG	1. Evidence to produce an improvement plan with targets and milestone dates.

# Senior Responsible Officer: Inderjit Lahal-Head of Integrated Commissioning, Partnerships & Performance, Dudley MBC

## Area of Significant Weakness 4:

Joint commissioning is underdeveloped. It is not always informed by accurate analysis of performance data, which is required to understand areas of need and gaps in current service provision.

- Formalised Joint Commissioning Arrangements
- An outcomes led framework and performance metrics are agreed and in place
- Commissioning decisions informed by outcomes / spend / value for money

Objective	Actions	Completion Date	Lead Officer	Evidence/Impact.
A. To develop	1. Incorporate the SEND Agenda into the current Joint Learning Disability	December 2019	Head of	1. Evidence that the
a formal	Commissioning programme including revised Section 75 arrangements and		Integrated	SEND and Learning
governance	Terms of Reference for Group including enhancing membership.		Commissioning,	Disability agenda feeds
process for			Performance and	into wider Council and
SEND			Partnerships	CCG work programmes
commissioning			DMBC /	2. Associated
arrangements			Director of	Commissioning
and			Commissioning	programmes across
developments			Dudley CCG	SEND and Learning
				Disabilities are
				progressed where
				natural links are
				tangible.
				3. Formalised jointly
				funded posts as part of
				S75 between Dudley
				CCG and Dudley MBC
				(and / or Dudley Multi-
				Speciality Care

				Provider if appropriate).
B. Finalise and publish the Joint Commissioning Strategy	<ol> <li>Undertake a workshop with Parents / Carers to ensure shaping and input of priorities is built into the development of the strategy. The workshop will be a bespoke session as part of the Parent / Carer Forum programme held at Saltwells but hosted by the Head of Integrated Commissioning, Performance and Partnerships. Key areas of the session will cover: -         <ul> <li>Current commissioned spend</li> <li>Independent Provision</li> <li>Options to use funding more creatively</li> <li>Creation of new provision and models</li> <li>Parents views on gaps in the SEND arena</li> </ul> </li> </ol>	February 2020	Head of Integrated Commissioning, Performance and Partnerships DMBC/ Director of Commissioning Dudley CCG	<ol> <li>Workshop findings are clear and understood.</li> <li>Priorities reflect parents &amp; carers views.</li> <li>Parent &amp; Carer</li> <li>Forum owns some of the priorities within the Joint</li> <li>Commissioning</li> <li>Strategy.</li> <li>Development of a joint Commissioning</li> <li>Plan.</li> <li>Definition of a process for pooled budgets.</li> </ol>
C. Develop a robust performance and outcomes framework for SEND to inform current and future commissioning intentions.	1. Detail spend profile across the Council / DSG and CCG.	February 2020	Head of Integrated Commissioning, Performance and Partnerships DMBC/ Director of Commissioning Dudley CCG	<ol> <li>Benchmark of activity against spend across SEND system and comparison with other LA's and areas of good practice and impact.</li> <li>Clear outcomes framework for all funded services</li> <li>Inform areas for focus of High Needs Block spend and assess Value for Money</li> </ol>

2. In line with the SEND Strategy and associated Joint Commissioning Strategy develop a 5 year plan to support the key outcomes for Dudley's children with SEND.	February 2020	SEND Commissioning Officer DMBC / Commissioning Manager Children, Young People and Families CCG	against relative output and outcomes for children. 1. Projected demand model developed and communicated to Schools and Parents / Carers 2. Costed models and initiatives in place developed in partnership with stakeholders
3. Analyse the impact and effectiveness of future commissioning initiatives to ensure they provide an integrated approach to needs provision.	March 2020	SEND Commissioning Officer DMBC / Commissioning Manager – Children, Young People and Families CCG	1. Establishment of review methodology and options appraisals as part of SEND Commissioning programme which includes a review process.
4. Formalise current maintained arrangements with Special, Schools and Independent Providers into SLA's and / or contracts as appropriate.	March 2020	SEND Commissioning Officer DMBC	<ol> <li>Standardised         <ul> <li>arrangements with             associated contractual             expectation are in             place             <ul> <li>Information used to</li></ul></li></ul></li></ol>

D. To ensure that all Dudley services for CYP with SEND embrace the 'tell it once approach' to avoid multiple assessments.	<ol> <li>Ensure that all CYP with complex and multiple health needs will be consistently provided with passports which communicate their health and support needs.</li> <li>Agree and confirm how the work of the Early Year's transformation academy (EYTA) can develop an integrated care model for SEND CYP.</li> </ol>	April 2020 February 2020	Commissioning Manager Children, Young People and families CCG Head of Service CYP, Health and Wellbeing/Head	<ol> <li>Decrease of 50% in parents and carers rating 'poorly' their CYP's needs being identified compared with the April 2019 baseline by May 2020.</li> <li>Decrease of 50% in parents and carers rating 'poorly' their</li> </ol>
	3. Complete review of the resource requirements to ensure consistent delivery of 2yrs and 2.5yrs pre-school needs reviews.	February 2020	of Family Solutions DMBC Head of Service CYP, People, Health and Wellbeing DMBC	CYP's needs being met compared with the April 2019 baseline by May 2020. 1. Review output shows levels of resource required against the number of reviews and a plan to close any identified
E. Ensure processes, pathways and access to commissioned services are effective.	1. Embed a process to reduce delays in referrals to the 0 to 5 autism spectrum disorder (ASD) service by working with referring agencies to gather information to better understand the reasons for delays, and ensure referral timeliness are monitored through Clinical Quality Reporting Meeting.	April 2020	Commissioning Manager- Children, Young People and Families CCG	gaps. 1. Process will show which evidence has been used to design the reduction plans. 2. Process will define current levels of delay and how it will evidence future referrals taking place in a timely manner.

2. Review the core CAMHS offer to bring it in line with complimentary services such as Positive Steps to ensure a holistic approach to CYP with mental health issues up to age 19.	April 2020	Commissioning Manager- Children, Young People and Families CCG	1. Emotional health and wellbeing services for Children, Young People and Families are comprehensive and complimentary.
3. Review procedures for making direct referrals to paediatricians and CAMHS, particularly for allied therapists, to confirm the numbers and reasons for delays.	April 2020	Commissioning Manager- Children, Young People and Families CCG	<ol> <li>Baseline of current referral delays and reasons why.</li> <li>Remedial action plan in place.</li> </ol>
4. Complete review of physiotherapy support for and with young people post- 16 to clearly articulate the current service provision available under existing physiotherapy services and define the improved pathways, processes and service that will be available.	April 2020	Commissioning Manager- Children, Young People and Families CCG	<ol> <li>Evidence available to understand the current usage of support and areas that work well and those that do not.</li> <li>Evidence based approach to delivering service improvements with measures of success and milestone dates.</li> </ol>

# Senior Responsible Officer: Neil Bucktin-Director of Commissioning, Dudley CCG

## Area of Significant Weakness 5:

The DMO has insufficient capacity to promote SEND agenda across health providers.

## **Required Outcomes:**

- Increased levels of capacity to promote the SEND agenda across health providers
- Increased levels of health input capacity into EHCP's to increase their effectiveness in assessing SEND provision

Objective		Actions	Completion Date	Lead Officer	Evidence/Impact.
A. Raise the level of awareness of the SEND agenda across	1.	Complete the business case for appointment of DCO to support DMO.	November 2019	Commissioning Manager- Children, Young People and Families CCG	1. Publication of the business case for review and feedback by all stakeholders.
all Health Providers.	2.	Successfully complete the CCG governance process to sign off additional DCO support.	December 2019	Director of Commissioning CCG	1. Approval of the business case to recruit the DCO.
	3.	Design and implement the recruitment process for the DCO to include job description and specification, advert and interview logistics and appointment.	January 2020	Commissioning Manager- Children, Young People and Families CCG	1. Recruitment of the DCO successfully completed.
	4.	Design an effective proactive SEND briefing/communication plan for health providers to ensure the dissemination of the SEND agenda and provide an effective mechanism for feedback form parents and carers.	March 2020	DMO	1. Publication of the plan for review and feedback.
	5.	Evaluate the effectiveness of the DCO's impact on raising awareness of the SEND agenda and the feedback mechanisms for parents and carers.	September 2020	DMO	1. Health provider survey shows increased knowledge of the SEND agenda.

				2. Evidence of
				supporting a more
				effective EHCP process.
B. Increased	1. Agree how additional support and advice can be provided to healthcare	January 2020	DCO & SEND	1. Increased level of
EHCP	professionals to ensure the health needs of SEND CYP are fully identified.		Manager DMBC	parent carer
effectiveness				satisfaction by 20%
in assessing				that their CYP health
health				needs are being
requirements				identified compared to
for SEND CYP.				the April 2019 baseline
				by May 2020.
	2. Agree how support and advice can be provided to healthcare professionals	January 2020	DCO & SEND	1. Increased level of
	to ensure the health needs of SEND CYP are fully met		Manager DMBC	parent carer
				satisfaction by 20%
				that their CYP health
				needs are being met
				compared to the April
				2019 baseline by May
				2020.

## Senior Responsible Officer: Andy Gray, Chief Executive Dudley CVS

#### Area of Significant Weakness 6:

Co-Production with parents is weak. Co-production at a wider strategic level is underdeveloped.

#### **Required Outcomes:**

- A clearly defined vision and ambition of strong co-production across the Dudley Area (*please refer to Appendix A for co-production model and communications plan*) Partnership.
- Effective strategic co-production and accountability which is embedded in practice and ensures that SEND priorities are owned across Education, Health and Social Care
- Processes evidence early involvement of parents/carers in the strategic developments, design, monitoring and evaluation of SEND and associated services

Objective	Actions	Completion Date	Lead Officer	Evidence/Impact.	
A. Establish a	1. Share the Ofsted findings and key actions with parents/carers through	October 2019	Children's DCS	1. Parents/Carers fully	
clear definition	attendance at parent carer meetings and communication bulletins.		DMBC	informed of the	
of co-				OFSTED inspection	
production				findings and how we	
across the				will update them with	
Dudley area				progress via regular	
				communications and	
				forum updates.	
	2. Identify examples of best practice across Dudley and implement this	November 2019	Interim Assistant	1. Partners will know	
	practice borough wide		Director for	what is currently	
			Education, SEND,	working well in Dudley	
			Family Solutions	through parent carer	
			& Youth Dudley	survey feedback and	
			MBC	update reports via	
				governance	
				groups/boards.	
	3. Ensure the definition of co-production is clearly defined in the Children's	November 2019	Dudley CVS Lead	1. The Board at a	
	Services Improvement Board terms of reference			strategic level adopt	

				the definition of co- production for SEND.
	4. Develop a co-production agreement with partners and stakeholders	November 2019	Dudley CVS Lead	<ol> <li>Co-production agreement has defined roles, responsibilities and expectations.</li> <li>Measures of success will include milestone dates.</li> </ol>
	5. Further investigate the opportunity of working alongside the Northwest Regional lead	November 2019	Dudley CVS Lead	1. There will be clarity on what current best practice and 'Good' looks like.
B. An agreed, understood and embedded culture for co- production with families, children and young people	1. Co-produce a feedback process with the Youth Council and Children in Care Council to ensure the voice of children and young people is fully embedded into system re-design on an ongoing basis.	November 2019	SEND Manager DMBC	<ol> <li>Children and young people are at the centre of all decision making.</li> <li>CYP survey feedback shows their inputs have been adopted in the design and review of SEND services.</li> </ol>
	2. The Children's Service Improvement Board to monitor and approve all SEND improvement strategies to ensure they are co-produced.	December 2019	Interim Assistant Director for Education, SEND, Family Solutions & Youth Dudley MBC	<ol> <li>Families and young people are at the centre of decision making</li> <li>All Strategies signed off by the Improvement Board have been co- produced.</li> </ol>

	3. Meet with the parent/carer forum to review SEND provision and review the Local Offer.	December 2019	SEND Manager DMBC /Dudley CVS Lead	<ol> <li>All new and revised strategies and processes have been developed through co- production.</li> <li>Parents &amp; Carers understand the system as they have been involved from the beginning.</li> <li>A clear and defined Local Offer that is easy to navigate.</li> </ol>
C. Embed regular participatory activity that is meaningful and appropriate to the task in hand to ensure the voices of families, children and young people are heard.	1. Capture the views of the parent/carer forum as to how they would be represented at task and finish groups	November 2019	SEND Manager DMBC /Dudley CVS Lead	<ol> <li>Parent &amp; Carer rep feedback that their views are being taken into consideration by the task and finish groups.</li> <li>Co-production will be built into every day practice.</li> <li>Systems will be easier to navigate due to the involvement of service users in their design.</li> </ol>
	2. Define how participation training would feature within our workforce strategy.	November 2019	SEND Manager DMBC	1. Annual reviews show that professionals working with SEND children understand what participation means.

3. Ensure the Communication Plan clearly defines how we capture the voice of	December 2019	SEND Manager	1. Definition and	
children, young people and families through our improvement journey.		DMBC & Dudley	agreement of the	
		CVS Lead	process and methods	
			to capture feedback.	
			2. All professionals will	
			have a defined way of	
			capturing service user	
			voice on an on-going	
			basis to ensure our	
			services improve.	

## Senior Responsible Officer: Helen Ellis-Interim Assistant Director for Education, SEND, Family Solutions & Youth, Dudley MBC

### Area of Significant Weakness 7:

There is a great deal of parental dissatisfaction. The passion and commitment of the various parent groups has not been harnessed. Many parents feel disengaged with the system.

- Relationships and trust is built with all parents/carers
- Parents/Carers and young people have a clearly defined integral role in reviewing and designing services
- The vision for SEND in Dudley is jointly created and owned by families and all services working with SEND children and young people
- Parents/carers and children and young people have access to information on SEND in a timely, clear and transparent way

Objective	Actions	Completion Date	Lead Officer	Evidence/Impact.	
A. Partners and	1. Meet with current/ active parents and carers groups to share the recent	November 2019	Interim Assistant	1. Parents & Carers	ı
parents have	SEND Inspection response and agree the co-production model.		Director for	understand their role	ı.
an agreed co-			Education, SEND,	as a member of the co-	ı.
production			Family Solutions	production team.	ı.
model with an			& Youth Dudley	2. Increase in	ı
equal stake in			MBC	confidence by Parents	ı.
decision				& Carers of 20% that	ı
making.				they are consulted	ı.
				against the April 2019	ı.
				baseline by May 2020.	ı.
				3. Evidence that levels	r
				of parent & carer trust	r
				have increased by 20%	ı.
				against the 2019	ı.
				baseline by May 2020.	ı.
	2. Capture parents and carers input into the SEND improvement strategy.	November 2019	Interim Assistant	1. Co-production	
			Director for	model exists and	ı.
			Education, SEND,	parents & carers	

			Family Solutions & Youth Dudley MBC	understand how they can input into it. 2. The strategy sets out how services will be improved or designed to reflect families input.
B. The partnership publishes an agreed simple, clear and concise	<ol> <li>Agree and publish a procedure where complaints are dealt with professionally, within timescales and parents/carers are kept up to date in individual cases.</li> </ol>	January 2020	SEND Manager DMBC & Dudley CVS Lead	1. Published procedure includes detail of how feedback and comments will be captured in the revised procedure.
compliment and complaint procedure.	2. Organise a formal method for all feedback to be captured and comments relayed back to parents/carers.	January 2020	SEND Manager DMBC & Dudley CVS Lead	<ol> <li>Clear system in place to capture all feedback on care and share.</li> <li>Parents are contributing to the discussion with their personal views.</li> </ol>
	3. Agree and put in place a process to learn from complaints/mediation and tribunals and what has changed as a result is shared with parents via the Parent Carer Forum and publish on the care and share website.	January 2020	Dudley CVS Lead & SEND Manager DMBC	1. Process output includes agreed baseline of current levels of complaints/mediation/ tribunals to enable an improvement strategy with measures of success and milestone dates.
	4. Agree a pro-active approach to managing complaints received where early intervention is the key feature highlighted.	January 2020	SEND Manager DMBC	1. Evidence that parents are using and

				engaging in the appropriate process. 2. Clear approach evidenced in the Early Help Strategy.
C. Ensure that the ethos of all SEND partnership meetings/ activity is one of co – production.	1. Review governance arrangements ensuring there is robust parent/carer representation.	October 2019	Dudley CVS Lead & SEND Manager DMBC	<ol> <li>All groups are properly represented.</li> <li>Minutes of meetings clearly identify parent representatives and the impact of their views on decisions that are made.</li> <li>Services will increasingly be co- produced.</li> </ol>
	2. All partnership groups are reviewed to ensure representation of parents/carers	November 2019	Interim Assistant Director for Education, SEND, Family Solutions & Youth Dudley MBC	1. Parents & Carers are actively attending meetings representing the views of a wider range of parents their views and influence are recorded in minutes of meetings.

# Senior Responsible Officer: Bal Kaur, Head of Service, Children & Young People's Public Health, Dudley MBC

### Area of Significant Weakness 8:

There is a lack of understanding about inclusion in Dudley. The local area needs to change the culture and develop stakeholder confidence in the system.

#### **Required Outcomes:**

- Dudley is an inclusive borough which will ensure that children, young people and families who are most at risk of exclusion have more choice and control over their lives, are included in their local communities and achieve better outcomes.
- All SEND CYP feel included in all aspects of their life and are able to achieve their full potential.
- All stakeholders, including families and communities are confident that Dudley borough is an inclusive borough and understand their role and contribution to this outcome.

Objective	Actions	Completion Date	Lead Officer	Evidence/Impact.	
A. Increase the	1. CYP Alliance Board to hold a number of stakeholder events to contribute	January 2020	Children & Young	1. Feedback captured	
understanding	and shape the development of an inclusion strategy /approach for Dudley.		People Alliance	at the end of each	
of inclusion in	(A multi-agency sub group set up to oversee the development of the		Board Chair	event will show	
Dudley by	strategy).			stakeholders	
changing the				understand the need	
culture and				to improve the culture	
developing				of inclusion in Dudley	
stakeholder				and their role in	
confidence in				improving it or identify	
the system.				gaps.	
	2. Create an action plan to improve and embed Inclusion principles including a focus on policy, practice, practitioners and commissioners, together with a	March 2020	Children & Young People Alliance	1. Raised awareness across Dudley of the	
	methodology to measure success across a range of settings including		Board Chair	importance of	
	communities, maternity, early years, education and employment.			Inclusion, what it	
				means, why it's	
				important and why it is	
				everyone's	
				responsibility.	

3. Publish a co-produced inclusion strategy that includes an approach to measure our progress and success in raising the levels of inclusion for SEND CYP.	March 2020	Children & Young People Alliance Board Chair	<ul> <li>2. CYP policies and practice shaped by principles of inclusion, including SEND strategy and include measures of success and milestones.</li> <li>1. Approaches developed to measure inclusion across a range of settings including, community, education, services and employers.</li> <li>2. The strategy makes clear and illustrates how it was developed and co-produced with</li> </ul>
			CYP, carers, families and all other relevant stakeholders.
4. Set a clear strategic commitment to prioritising Inclusion in Dudley Borough, that sets out a clear vision.	July 2020	Children & Young People Alliance Board Chair	1. 'Inclusion' is a stated on-going priority and ambition for the CYP Alliance Board.

# Senior Responsible Officer: Deborah Harkins-Director of Health & Wellbeing, Dudley MBC

### Area of Significant Weakness 9:

The published local offer is poor. It is underused and difficult to navigate.

#### **Required Outcomes:**

- Families find the Local Offer website and statutory assessment process clear, accessible and informative.
- Parents/Carers and children and young people have access to information on SEND in a timely, clear and transparent way.
- Higher proportion of families and children using the Local Offer to increase their knowledge of information and participation in community activities.

Objective	Actions	Completion Date	Lead Officer	Evidence/Impact.	
A. Families and CYP feel connected to their community through higher	1. Creation of a new post to focus on the development of the Local Offer to enhance its content via co-production with Parents, Carers, CYP and other stakeholders.	January 2020	Interim Assistant Director for Education, SEND, Family Solutions & Youth Dudley MBC	1. Usage data shows an increase in use of 20% compared to the April 2019 baseline by May 2020.	
levels of inclusivity.	2. Ensure a task and finish group is in place to co-design the local offer to ensure a focused and timely launch of an improved Local Offer to be integrated into the Dudley Community Information Directory (DCID), and ensure that it is accessible to children, young people and adults with special educational needs and disabilities.	January 2020	SEND Manager DMBC	1. Increased satisfaction of children, young people and their families of 20% that the local offer reflects their needs compared to the April 2019 baseline by May 2020.	
	3. Engage with all stakeholders to capture specification requirements for SEND information listing and service sign posting together with community wide accessibility and links.	February 2020	SEND Manager DMBC	1. Evidence the Local Offer is up to date and easy to navigate for all users in Dudley.	
B. Ensure that co-production is at the heart	1. Agree the final format and launch the local offer together with accompanying communications to all user groups and stakeholders.	February 2020	Interim Assistant Director for Education, SEND,	1. Local Offer integrated in to the DCID so that CYP with	

of the design and sustainability of the Local			Family Solutions & Youth Dudley MBC	SEND can access a range of community assets as well as SEND specific information.
Offer.	2. Launch the local offer as part of the Dudley Community Information Directory to improve the content and usability of relevant SEND Services and supporting information within an accessible and inclusive DCID.	April 2020	Director of Health and Wellbeing DMBC	1. 50% reduction in dissatisfaction with not being able to 'find what I need' compared to the April 2019 baseline by May 2020.
	3. Once live, undertake online survey to gather feedback and opinion on the new format and usefulness and relevance of the content.	August 2020	SEND Manager DMBC	<ol> <li>50% increase in awareness of the local offer compared to the April 2019 baseline by May 2020.</li> <li>Usage data shows CYP with SEND are accessing inclusive community information as well as specialist SEND support.</li> </ol>

## Senior Responsible Officer: Helen Ellis-Interim Assistant Director for Education, SEND, Family Solutions & Youth, Dudley MBC

## Area of Significant Weakness 10:

EHC plans are often of a poor quality. They are not outcome-focused and often lack information about health and social care. Completed EHC plans are often not shared with early years settings.

### **Required Outcomes:**

- New co-produced Guidance Document is agreed and shared with all partners, professionals and families setting out requirements for a good EHC plan
- An audit system is agreed, tested and used to report on the improving quality of EHC plans
- Monitoring shows EHC plans contain appropriate information, are needs led, outcomes focused and completed within the 20 weeks' timescale
- Monitoring shows the evidence of the "Tell It Once" approach being consistently used
- EHC plans are shared consistently across the system

Objective	Actions	Completion Date	Lead Officer	Evidence/Impact.	
A. Improve the quality of EHC plans and ensure they are outcomes focused.	1. Carry out a review of SEND staffing to ensure that the structure is suitable for delivering the highest quality EHCPs in line with the 2014 Code of Practice.	November 2019	Interim Assistant Director for Education, SEND, Family Solutions & Youth Dudley MBC	<ol> <li>A new staffing structure is agreed and in place.</li> <li>A date is set for compliance with the code of practice and when the backlog is completed.</li> <li>Completion rates moving forward monitored monthly by the CSIB.</li> </ol>	
	2. Establish a task and finish group to develop a new guidance document setting out clear requirements for a good EHC plan based on "Tell it Once" and ensuring a clear focus on outcomes.	February 2020	SEND Manager DMBC	1. The guidance document will set out quality standards and benchmarking criteria	

			<ul> <li>that will be approved</li> <li>by the CSIB.</li> <li>2. The guidance</li> <li>document will define</li> <li>the outcomes</li> <li>delivered and</li> <li>measures of success</li> <li>for them.</li> </ul>
3. Devise and test a recurrent audit system that is then used moving forward in the case management process with evidence of partners contributing to ensure that expectations are consistently delivered	February 2020	SEND Manager DMBC	<ol> <li>Evidence of on-going compliance with the code of practice requirements.</li> <li>Evidence of the "Tell it Once" approach being consistently used in the completion of EHC plans.</li> </ol>
4. Share the guidance document with the SENCO network to ensure that the Graduated Approach is embedded in the guidance in order to support schools with the plan, do, and review process.	January 2020	Lead for Education Outcomes DMBC	<ol> <li>Guidance document is agreed &amp; approved in line with feedback from settings and families.</li> <li>The audit process shows consistent use of the new graduated response and plan, do, review.</li> </ol>
5. Develop a shared SEND induction and training programme for staff and managers working on SEND and EHC plans.	January 2020	SEND Manager DMBC	1. EHC plan audits shows pupils with SEND have appropriate provision identified in their EHC plan.

				2. SMART outcomes are evident in each EHC plan.
B. Establish an effective Online EHC plan system for Dudley	1. Complete a review of any current on line Dudley EHCP and produce an options appraisal to introduce an on line system to meet the requirements of the code of practice relating to EHCP's.	March 2020	SEND Manager DMBC	<ol> <li>A decision is made to use the online EHCP.</li> <li>Audit process and management information shows the current baseline of complaints to new EHCP's and the planned improvements and milestones.</li> </ol>
C. EHC plans contain post 16 aspirations and links to employers	1. Design a process to ensure that the audit will result in a process to ensure post 16 aspirations, outcomes and links to employers are included in EHCP's	March 2020	SEND Manager & Connexions DMBC lead	1. The audit process evidences that EHC plans consistently include post 16 aspirations and outcomes and links to employers.
D. Completed EHC plans are often not shared with early years settings	1. Complete a review of the guidance and policies for EHC plans to ensure that procedures are in place to ensure that latest plans are shared with early year's settings.	March 2020	SEND Manager DMBC	1. The audit process evidences that EHC plans are consistently shared with early years settings and that this is built into the annual review process.
E. EHC plans often lack information about health and social care	1. Complete an analysis of the reasons why EHC plans do not always contain appropriate information about health and social care needs and develop a remedial action plan to include the extent to which the DMO will be involved in reviewing the plans quality.	February 2020	SEND Manager DMBC /DMO/Head of Safeguarding & Quality Assurance DMBC	1. Evidence of the quality and consistency of health and social care information.

2. Complete a review to ensure that the EHC plan guidance document includes appropriate information relating to health and social care information.	March 2020	SEND Manager DMBC	<ul> <li>2. A remedial plan is agreed to address weaknesses identified.</li> <li>1. Evidence that health and social care needs are being included.</li> <li>2. Audit process for EHC plans evidences consistent inclusion of health and social care</li> </ul>
3. Produce guidance and best practise examples for health and social care professionals to support them to appropriately specify needs, provision and outcomes in EHC plans.	March 2020	SEND Manager DMBC	information. 1. Annual reviews illustrate best practice examples are being used in training for staff.
4. Establish a joint work stream to design and implement an evidence based co-ordinated approach to ensure the accurate and timely capture of health and social care in EHCP's.	March 2020	DMO/SEND Manager DMBC	<ol> <li>Systems and processes in place early identification of those CYP with SEND with specific health related needs.</li> <li>Evidence of increased parent &amp; carer satisfaction by 20% that their CYP are correctly identified compared to the April 2019 baseline.</li> </ol>

# Senior Responsible Officer: Neil Hoskinson-Lead for Educational Outcomes, Dudley MBC

## Area of Significant Weakness 11:

Pupils with SEND make slower progress than other pupils.

## **Required Outcomes:**

- Identification & improvement of the key outcomes that Dudley children with SEND perform poorly on.
- Improve the rates of progress for pupils with SEND at KS2 & KS4.
- Increased confidence of partners and parents or wellbeing of CYP or their ability to access the curriculum better.
- Reduce the gap for each SEND cohort to the national levels at the end of the early year's foundation stage.

Objective	Actions	Completion Date	Lead Officer	Evidence/Impact.
A. Establish	1. Agree key performance indicators in order to use benchmark data more	November 2019	Lead for	1. Performance
what is meant	effectively to identify key actions and to measure their impact.		Education	Indicators agreed by
by better			Outcomes DMBC	DMT/CCG and parent /
outcomes				carers based on
				national and statistical
				neighbour
				benchmarking.
				2. Evidence of gap(s)
				between the Dudley
				EHCP cohort and
				national benchmarks.
				3. A plan is in place
				that details the
				improvement targets
				together with
				milestone dates.

2. Complete a full audit and 'data cleanse' to ensure SEND information from different sources is accurate.	November 2019	Lead for Education Outcomes DMBC	<ol> <li>All CYP with EHCPs have an accurate</li> <li>Primary &amp; Secondary</li> <li>Need analysis in line</li> <li>with the 2014 code of</li> <li>practice.</li> <li>A plan is in place</li> <li>that shows how and by</li> <li>when the Dudley</li> <li>cohort will be in line</li> <li>with national and</li> <li>statistical neighbour</li> <li>averages together with</li> <li>milestone dates.</li> </ol>
3. Review the process of recording CYP primary & secondary needs to ensure they are accurately captured and monitored through a regular reporting framework.	February 2020	Lead for Education Outcomes DMBC	<ol> <li>Data monitoring and reporting cycle agreed by DMT/CCG and in place to ensure that all new CYP issued with an EHCP have an accurately assessed Primary and Secondary Need.</li> <li>Reduction in the level of parent &amp; carer dissatisfaction with the assessment of their CYP's needs by 50% against the April 2019 baseline by May 2020.</li> </ol>

	4. Use the new data dashboard to analyse the cohort and the change in pupil characteristics.	February 2020	Lead for Education Outcomes DMBC	1. Publication of the current levels of performance at EY's, KS2 and KS4 stages 2. A plan is in place that details the proposed initiatives to improve at each key stage together with measures of success and milestone dates.
B. Close the gap in the rates of progress for pupils with SEND with all pupils nationally and all pupils in Dudley	1. Disseminate key development points from the Local Area Ofsted Inspection and the WSoA with schools as well as regular updates of the progress made against individual targets.	June 2019	Lead for Education Outcomes DMBC	<ol> <li>Briefings are sent to head teachers, SENCOs and chairs of governance regarding the key messages in the local area inspection.</li> <li>The key messages, the actions within the WSoA and updates of progress against each target are regularly shared at forums and in regular briefings.</li> </ol>
	<ul> <li>2. Complete a review of accurate assessment and improving rates of progress of pupils with SEND at: <ul> <li>Headteacher forums</li> <li>SENDO forums</li> <li>Parent Carer forums</li> <li>Ofsted EIF training</li> <li>Specialist Inclusion Services CPD sessions</li> </ul> </li> </ul>	December 2019	Lead for Education Outcomes DMBC	1. All key strategies to raise outcomes for pupils with SEND are shared within the regular cycle of training, support and challenge for schools

			by Dudley officers and support services. 2. The actions to be taken to raise outcomes and an assessment of the impact are shared with the Parent Carer Forum and all Dudley families through the Dudley website.
3. Implement a process for a cycle of continual improvement i learning into the schools visit pro-forma.	oy incorporating January 2020	Education Outcomes DMBC	<ol> <li>There is evidence of SEND having a high priority in all Notes of Visit carried out by school improvement officers.</li> <li>SENCo forums include best practice sharing events.</li> </ol>
4. To pilot the new Dudley SEND Charter, once agreed, to clea practice for identification, tracking of SEND pupils and self-eva outcomes.		Lead for Education Outcomes DMBC	<ol> <li>Evidence from the schools survey of it being used to identify schools that are not effectively identifying, tracking and evaluating the outcomes of their pupils with SEND.</li> <li>A plan is in place to address the identified issues and includes measures of success and milestone dates.</li> </ol>

	5. Complete a review of CPD for schools delivered by the Specialist Inclusion Services, Learning Support Service and other LA services to develop and set a date for a pilot of the Advanced Inclusive Teaching training programme.	April 2020	Lead for Education Outcomes DMBC	<ol> <li>Evidence of external expertise being sourced to develop an Advanced Inclusive Teaching training programme.</li> <li>Feedback from parents &amp; carers shows that satisfaction with education provision has improved by 20% compared to the April 2019 baseline by May 2020.</li> </ol>
C. Increase the confidence of partners and parents or wellbeing of CYP or their ability to access the curriculum better.	1. Agree a data protocol between the LA, schools, families and other stakeholders regarding what data will be kept, how it will be kept and how/when it will be shared and all GDPR requirements.	December 2019	Lead for Education Outcomes DMBC	<ol> <li>Data Protocol is amended and approved by the DMT/CCG as fit for purpose.</li> <li>The protocol is accepted by all schools and used by families and other stakeholders.</li> <li>Where it is not used, there are clear reasons recorded and evidence is available to show how this has been challenged.</li> </ol>
	2. To use internal and external expertise to devise an annual programme of training for all schools to develop knowledge skills and confidence.	March 2020	Lead for Education Outcomes DMBC	1. A new training programme is agreed by DMT/CCG/CSIB,

			delivered on an annual cycle by the Learning Support Service and feedback clearly shows the improvement in knowledge, skills and confidence of individual staff in assessing need.
ntly established SEND Data Analysis tool to complete an ainment and progress of each group of pupils with SEND.	March 2020	Lead for Education Outcomes DMBC	<ol> <li>Output provides         evidence based         assessment of         attainment and         progress for each         group of pupils with         SEND.         2. Confirmation of how         Dudley compares         regionally and         nationally and a plan is         in place with targets to         match/exceed         comparable         performance.         3. Decrease in Parent         &amp; Carer dissatisfaction         by 20% that their CYP's         educational attainment         is improving compared         to the April 2019         baseline by May 2020.</li> </ol>

	4. Produce an amended training and guidance document to ensure that support and intervention for SEND pupils is effective in the improvement of their outcomes.	April 2020	Lead for Education Outcomes DMBC	1. Evidence of improved outcomes for Dudley pupils with SEND.
D. Improve school readiness of CYP with SEND	1. Undertake a review of school readiness approaches with the Early Year's Transformation Academy (EYTA) to identify areas required to improve the school readiness of children with SEND.	March 2020	Head of Service CYP, Health and Wellbeing DMBC /Head of Family Solutions DMBC	<ol> <li>Evidence of baseline for numbers of missed SEND diagnosis.</li> <li>A plan shows how improvements will be made with measures of success and milestone dates monitored by the SRO and Programme Manager.</li> </ol>
	2. Review and refine the integrated health and early years review at 2 2.5 years to identify CYP at risk of not being school ready to produce an agreed standard operational procedure together with measures of success and milestone dates.	March 2020	Head of Service CYP, Health and Wellbeing DMBC	<ol> <li>Increased level of performance for SEND Supported in all GLD Prime Areas to national levels by July 2021.</li> <li>Increase the level of performance for SEND with EHCP's achieving the GLD level from the current 0.9% to the national average of 4.5% by July 2024.</li> </ol>

# Senior Responsible Officer: Neil Hoskinson-Lead for Educational Outcomes, Dudley MBC

### Area of Significant Weakness 12:

Pupils with SEND have higher absence and exclusions rates than other pupils.

### **Required Outcomes:**

- To narrow the gap between levels of absence and persistent absence for pupils with SEND with all pupils nationally, regionally and in statistical neighbour LA's.
- To narrow the gap between the number of fixed term and permanent exclusions for students with SEND compared with all pupils nationally and in Dudley.

Objective	Actions	Completion Date	Lead Officer	Evidence/Impact.
A. To close the	1. Identify, collate then analyse the data/reasons relating to levels of absence	January 2020	Lead for	1. Evidence of why
gap between	and persistent absence of CYP with SEND compared to all pupils nationally and		Education	there is absence and
the levels of	all pupils regionally and in statistical neighbour LAs.		Outcomes DMBC	persistent absence for
absence and				all groups with SEND in
persistent				Dudley.
absence for				2. A plan is in place to
pupils with				reduce absence and
SEND with all				persistent absence
pupils				together with
nationally,				measures of success
regionally and				and milestone dates.
in statistical	2. Develop a clear strategy for schools on improving attendance in relation to	April 2020	Lead for	1. A strategy for
neighbour LAs.	SEND which will include performance monitoring.		Education	improving the
			Outcomes DMBC	attendance of Dudley
				CYP with SEND is
				devised and then
				shared with / agreed
				by DMT/CCG
				Board/CSIB. This
				includes a clear
				monitoring programme
				for SEND attendance.

	3. Ensure that all Specialist Inclusion Services, Learning Support Service and the Pupil Access Team have a clear focus on improving attendance for CYP with SEND.	March 2020	Lead for Education Outcomes DMBC	1. Clear evidence of the attendance strategy assisting the work of Specialist Inclusion Services, Learning Support Service and the Pupil Access Team to improve attendance.
	4. Gather evidence from schools, including case studies to identify successful early intervention to improve attendance for CYP with SEND. To inform future training and support for schools on improving attendance.	March 2020	Lead for Education Outcomes DMBC	<ol> <li>Understanding of where best practice is most effective in reducing SEND absence.</li> <li>A plan is in place by July 2020 that details how absence will be reduced together with measures of success and milestone dates.</li> </ol>
B. To close the gap between the number of fixed term and permanent exclusions	1. Ensure that the new Wider Inclusion Strategy includes a priority on reducing all exclusions and off-rolling for CYP with SEND.	November 2019	Lead for Education Outcomes DMBC	1. The Wider Inclusion Strategy is launched containing agreed proposals to reduce exclusions and off- rolling for Dudley SEND
received by students with SEND compared with all pupils nationally and	2. Publish the Wider Inclusion Strategy that includes clear targets to reduce all exclusions for CYP with SEND and a pledge to not permanently exclude any CYP for behaviours linked to their SEND or with an EHCP.	January 2020	Lead for Education Outcomes DMBC	<ol> <li>Targets are set to reduce all exclusions for CYP with SEND.</li> <li>Strategy includes a pledge to not permanently exclude</li> </ol>

all pupils in Dudley	3. Communicate the full Wider Inclusion Strategy consultation responses to better inform all partners and stakeholders understanding of inclusion.	November 2019	Lead for Education Outcomes DMBC	any CYP for behaviours linked to their SEND or with an EHCP. 1. Case studies and feedback from CYP, their families and
				schools evidences the impact of the strategy.
	4. Consolidate initiatives and approaches across Education, Youth Offending and Children Looked After to agree a strategy to provide early intervention for CYP with SEND at risk of offending.	June 2020	Lead for Education Outcomes DMBC / Head of Family Solutions DMBC /Head of the Virtual School DMBC	<ol> <li>There is a clear and agreed strategy for early intervention to prevent CYP with SEND being at risk of offending.</li> <li>The strategy includes Dudley YOS, the West Midlands Police and all schools.</li> <li>Confirmation of the current numbers at risk of offending.</li> <li>A plan is in place that sets targets to reduce the number at risk with milestone dates.</li> </ol>

# Senior Responsible Officer: Neil Bucktin, Director of Commissioning, Dudley CCG

#### Area of Significant Weakness 13:

There is a lack of local provision post-19 for young people with the most complex needs.

#### **Required Outcomes:**

- A clearly defined and co-produced transitions pathway
- Preparations for Adulthood is clearly defined
- Post 19 provision for young people with the most complex needs is in place and understood

Objective	Actions	Completion Date	Lead Officer	Evidence/Impact.
A. To improve	1. Form a task and Finish group to review protocol co-produced with	December 2019	Head of DDS	1. Identification of the
the Transitions	parents/carers to identify areas of improvements in the transition process.		DMBC	problem areas of
protocol				transition.
between				2. Plan to resolve these
Children's				together with
Services and				measures of success
Adults Services				and milestone dates.
B. To have a	1. Consultation with Parent/Carer forum and other parent groups to capture	January 2020	Dudley CVS Lead	1. Preparation for
clear, co-	all experiences and suggestions for improvement.			Adulthood pathway
produced				documentation agreed
preparation for				and produced across
Adulthood				the partnership.
pathway which	2. Finalise and issue the revised Adulthood pathway documentation and	March 2020	Head of DDS	1. The workforce are
details roles	guidance.		DMBC	clear on their
and				accountabilities and
responsibilities				the support process.
of all key				
stakeholders				
C .Review local	1. Carry out a mapping exercise identifying gaps and challenges together with	March 2020	Director of	1. A Post 19 provision
provision post	identification of improvement areas.		Commissioning	map is produced to

19 for young people with the most complex needs to ensure smoother transition			CCG/ Head of Integrated Commissioning, Performance and Partnerships DMBC	enable the formulation pf a plan and milestone dates to improve transition.
between Children's and Adults Services	2. Ensure all service users are aware of all post 19 provision through briefings and updates to ensure that opportunities are not missed and take up is maximised.	March 2020	Director of Commissioning CCG/ Head of Integrated Commissioning, Performance and Partnerships DMBC	1. All Service Users are clear of Post 19 provision through briefing events and update communications.
	3. Review continuing care and transition policies/procedures to ensure they are fit for purpose and appropriate to reflect the full scale and range of needs, are not affecting transition and contain an effective method of gathering user feedback.	March 2020	Director of Commissioning CCG/ Head of Integrated Commissioning, Performance and Partnerships DMBC	<ol> <li>Establishment of feedback baseline on transition process.</li> <li>Quarterly feedback shows transition is smoother against March 2020 baseline of service user feedback.</li> </ol>
	4. Review current timing of the Year 11 review and confirm if some more complex cases may need earlier reviewing in year 10	March 2020	Head of DDS DMBC	1. Confirmation of current baseline/ targets/ dates for increased take up of employment/ training /apprenticeships.

## Senior Responsible Officer: Scott Jones-Interim Head of Family Solutions, Dudley MBC

### Area of Significant Weakness 14:

Too few young people with SEND progress into employment.

#### **Required Outcomes:**

- Increase in the number of apprenticeships offered to SEND students.
- Increase in the number of young people with SEND progressing into employment (linkage to getting a life.org project).
- Local employers to provide more opportunities for young people with SEND including developing work experience opportunities.
- Increased involvement from local education and training providers to undertake better pre-employment preparation with their SEND students.
- Increased awareness of the full range of opportunities available to SEND young people.

Objective	Actions	Completion Date	Lead Officer	Evidence/Impact.
A. Ensure that	1. Identify year 11 SEND cohort with no recognised post 16 destination to	November 2019	Lead for	1. List of any year 11
one to one	ensure that all are identified in order to ensure that all of the cohort have an		Connexions	cohort "at risk" of not
information	identified destination.		DMBC	progressing
and guidance				successfully to post 16
is offered to all				destination.
SEND young				2. Plan to have 100% of
people with no				cohort with a
confirmed post				destination together
16 destination				with milestone dates.
	2. Contact and offer one to one guidance sessions with specialist careers	December 2019	Lead for	1. Feedback from
	advice and guidance officers.		Connexions	sessions used to
			DMBC	identify any
				improvements
				required in advice and
				guidance to increase
				take up.
	3. Identify barriers to progression that are preventing a destination to be	January 2020	Lead for	1. List of barriers
	established to improve the quality of plans to improve progression.		Connexions	preventing progression
			DMBC	

				to employment for SEND CYP. 2. Counter plan is in place together with measures of success targets and milestone dates.
	4. Identify work experience opportunities for Year 10 & Year 11 SEND cohort to increase the number of employment opportunities.	January 2020	Lead for Connexions	<ol> <li>Identification of the numbers of current work experience opportunities available by school.</li> <li>Plan in place to increase the number with measures of success and milestone dates.</li> </ol>
B. Provide specific focus and support to young people at risk of offending and children looked after who are SEND	1. Identify the cohort and allocate dedicated resources to the virtual school to ensure we have a clear understanding of which of our SEND looked after children need to be supported appropriately.	November 2019	Head of the Virtual School DMBC	<ol> <li>Comprehensive list of specific cohort is identified.</li> <li>Plans formulated to address areas of improvement together with measures of success and milestone dates.</li> </ol>
	2. Advice and guidance specialists to work within the youth offending service to ensure all employment opportunities are explored	November 2019	Lead for Youth Offending Service	1. Advice and guidance support forms integral part of meetings and plans.
C. Provide intensive support to	1. Develop a process for regular follow up of SEND cohort that have entered employment or training within the last 6 months to ensure sustainability	November 2019	Lead for Connexions DMBC	1. List of issues preventing sustained

young people who have been NEET for over 6 months				employment for SEND young people. 2. Plans formulated to address areas of improvement together with targets and milestone dates.
	2. Establish links with Dudley College mentoring program and explore opportunities for SEND young people.	November 2019	Lead for Connexions DMBC	<ol> <li>Confirmation of current numbers of SEND YP involved in the mentoring programme.</li> <li>Co-produced plan to increase numbers together with milestone dates.</li> </ol>
D. Provide support to local employers to	1. Complete a gap analysis to identify geographical areas where there are a significant lack of employment opportunities.	February 2020	Lead for Connexions DMBC	1. Reliable data on which to base a remedial plan of action on.
increase the number of employment opportunities available to SEND CYP including work experience placements.	2. Engage with local employers to develop employment opportunities and increase their number for SEND CYP.	February 2020	Lead for Connexions DMBC	<ol> <li>Increase of 20% in the number of SEND YP offered employment by October 2020.</li> <li>Increase of 20% in the number of SEND YP offered apprenticeships by October 2020.</li> </ol>

## Appendix A

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