



## Health and Wellbeing Board - Supplementary

**Thursday 5 October 2017 at 7.00 pm**  
Board Rooms 3, 4 & 5 - Brent Civic Centre

### Membership:

Councillor Hirani (Chair)	Brent Council
Dr Ethie Kong (Vice-Chair)	Brent CCG
Councillor Butt	Brent Council
Councillor Colwill	Brent Council
Councillor McLennan	Brent Council
Councillor M Patel	Brent Council
Sheikh Auladin	Brent CCG
Dr Sarah Basham	Brent CCG
Rob Larkman	Brent CCG
Julie Pal	Healthwatch Brent
Carolyn Downs	Brent Council - Non Voting
Phil Porter	Brent Council - Non Voting
Dr Melanie Smith	Brent Council - Non-Voting
Gail Tolley	Brent Council - Non-Voting

### Substitute Members (Brent Councillors)

#### Labour Councillors:

Farah, Miller, Southwood and Tatler

#### Conservative Councillors:

Kansagra

**For further information contact:** Tom Welsh, Governance Officer  
020 8937 6607; [tom.welsh@brent.gov.uk](mailto:tom.welsh@brent.gov.uk)

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**The press and public are welcome to attend this meeting**

### **Notes for Members - Declarations of Interest:**

If a Member is aware they have a Disclosable Pecuniary Interest\* in an item of business, they must declare its existence and nature at the start of the meeting or when it becomes apparent and must leave the room without participating in discussion of the item.

If a Member is aware they have a Personal Interest\*\* in an item of business, they must declare its existence and nature at the start of the meeting or when it becomes apparent.

If the Personal Interest is also a Prejudicial Interest (i.e. it affects a financial position or relates to determining of any approval, consent, licence, permission, or registration) then (unless an exception at 14(2) of the Members Code applies), after disclosing the interest to the meeting the Member must leave the room without participating in discussion of the item, except that they may first make representations, answer questions or give evidence relating to the matter, provided that the public are allowed to attend the meeting for those purposes.

### **\*Disclosable Pecuniary Interests:**

- (a) **Employment, etc.** - Any employment, office, trade, profession or vocation carried on for profit gain.
- (b) **Sponsorship** - Any payment or other financial benefit in respect expenses in carrying out duties as a member, or of election; including from a trade union.
- (c) **Contracts** - Any current contract for goods, services or works, between the Councillors or their partner (or a body in which one has a beneficial interest) and the council.
- (d) **Land** - Any beneficial interest in land which is within the council's area.
- (e) **Licences** - Any licence to occupy land in the council's area for a month or longer.
- (f) **Corporate tenancies** - Any tenancy between the council and a body in which the Councillor or their partner have a beneficial interest.
- (g) **Securities** - Any beneficial interest in securities of a body which has a place of business or land in the council's area, if the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body or of any one class of its issued share capital.

### **\*\*Personal Interests:**

The business relates to or affects:

- (a) Anybody of which you are a member or in a position of general control or management, and:
    - To which you are appointed by the council;
    - which exercises functions of a public nature;
    - which is directed is to charitable purposes;
    - whose principal purposes include the influence of public opinion or policy (including a political party or trade union).
  - (b) The interests of a person from whom you have received gifts or hospitality of at least £50 as a member in the municipal year;
- or

A decision in relation to that business might reasonably be regarded as affecting, to a greater extent than the majority of other council tax payers, ratepayers or inhabitants of the electoral ward affected by the decision, the well-being or financial position of:

- You yourself;
- a member of your family or your friend or any person with whom you have a close association or any person or body who employs or has appointed any of these or in whom they have a beneficial interest in a class of securities exceeding the nominal value of £25,000, or any firm in which they are a partner, or any company of which they are a director
- any body of a type described in (a) above

# Agenda

Introductions, if appropriate.

Item	Page
<b>12 Approval of draft written statement of action in response to the Ofsted/CQC joint local area Special Educational Needs and Disabilities (SEND) inspection</b>	1 - 20

This paper presents the Brent Children's Trust Written Statement of Action. The Statement has been jointly developed by NHS Brent Clinical Commissioning Group and Brent Council, following a local area joint Ofsted and CQC inspection of Special Educational Needs and Disabilities (SEND) services in Brent.

**\*Members of the Committee and Public should note that all of the report and appendices are open with none of the information exempt as listed on the initial agenda.\***

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 <b>Brent</b>  Brent Clinical Commissioning Group	<p><b>Health and Wellbeing Board</b> 6 October 2017</p> <p><b>Report from the Strategic Director, Children and Young People Brent Council and Chief Operating Officer, Brent CCG</b></p>
Wards affected: ALL	
<b>Local Area Inspection of SEND Written Statement of Action</b>	

**\*Reason for urgency** The Brent local area Written Statement of Action is required to be submitted to the Office for Standards in Education, Children's Services and Skills (Ofsted) and the Care Quality Commission (CQC) by 23 October 2017. Consideration of this report is therefore required at the meeting of 6 October 2017.

## 1.0 Summary

1.1 This paper presents the Brent Children's Trust Written Statement of Action. The Statement has been jointly developed by NHS Brent Clinical Commissioning Group and Brent Council, following a local area joint Ofsted and CQC inspection of Special Educational Needs and Disabilities (SEND) services in Brent. The Health and Wellbeing Board is asked to approve the Written Statement of Action for submission to Ofsted and the CQC by 23 October 2017.

## 2.0 Recommendation(s)

2.1 The Brent Health and Wellbeing Board is asked to review the draft Written Statement of Action, suggest amendments and approve for submission to Ofsted and the CQC by the Strategic Director, Children and Young People as Chair of Brent Children's Trust.

### 3.0 **Detail**

#### 3.1 SEND Inspection

- 3.1.1 Between 15 May 2017 and 19 May 2017, Ofsted and the CQC conducted a joint inspection of Brent to judge the effectiveness of the area in implementing the SEND reforms as set out in the Children and Families Act 2014.
- 3.1.2 The inspection was led by one of Her Majesty's Inspectors from Ofsted, with a team of inspectors including a children's services inspector from the Care Quality Commission (CQC).
- 3.1.3 In their report, the inspectors identified many strengths in the local area's provision for children with SEND. These included the strong commitment from senior leaders across Brent Council in improving outcomes and services, how GPs offer annual health assessments to young people with a learning disability which strengthens the relationship between a young person and their GP practice, how children and young people achieved well academically because of the good partnership between schools and the Council, as well as the high quality of teaching they receive. It also noted that the Children's Trust Board ensures that improving education and care outcomes for children and young people remains at the heart of its work.
- 3.1.4 The report documented that children and young people who have special educational needs and/or disabilities are positive about the support they receive. Parents describe how their children's social skills and confidence are developed as a result of the local area's provision and that parents agree that professionals in Brent typically identify the needs of children and young people accurately and promptly.
- 3.1.5 The excellent care provided by the Ade Adepitan Short Breaks Centre, which was recently rated 'Outstanding' by Ofsted, was also commended in the report.
- 3.1.6 Although some aspects of the inspection were very positive, a Written Statement of Action has been requested. Brent Council, Brent CCG and health providers have worked together to address these concerns and respond to them so that children in any setting can get the right health advice and treatment to support their education. The most challenging of these concerns to address is the waiting times issue that has arisen due to wider shortages of specialist NHS staff. Brent CCG has appointed a specialist Designated Clinical Officer to oversee and speed up the programme of health reforms.

### 3.2 Written Statement of Action

3.2.1 The inspectors required the local area to provide a Written Statement of Action in regard to the following concerns:

- strategic leadership of the CCG in implementing the SEND reforms
- the fragmented approach to joint commissioning causing gaps in services
- the lack of opportunity for therapists to respond to draft EHC plans before they are finalised
- poor access to services for some vulnerable groups; in particular, to audiology, OT and speech and language therapy
- limited opportunities for parental involvement when designing and commissioning services.

### 3.3 Governance in developing and approving the Written Statement of Action

- 3.3.1 In developing our Written Statement of Action, the commissioners have worked with parents/carers, schools, and health providers involved in providing services for children with Special Educational Needs and Disabilities.
- 3.3.2 Engagement events were held with the Parent/Carer Forum (14 September) and through targeted workshops (21 September). A further engagement event is booked for 18 October, as the Brent Health Partners Forum.
- 3.3.3 The draft document was reviewed and amended by Brent Children's Trust (12 September).
- 3.3.4 On 26 September the NHS England London Region Lead for SEND and Department for Education SEND Advisor for Brent met with the chair of the Children's Trust (strategic lead for Brent Council) and other representatives of the council and the CCG to review the Written Statement of Action. Whilst they suggested some specific additional points, they were both complimentary about the content and progress. They advised that the Written Statement of Action was, subject to Health and Wellbeing Board endorsement, ready for submission.
- 3.3.5 The Brent Health and Wellbeing Board is asked to review and approve the Written Statement of Action. The final submission will be made by the Chair of Brent Children's Trust Board by 23 October 2017.

## 4 **Financial Implications**

4.1 None for approval of the SEND Written Statement of Action. Joint commissioning forms part of the action plan.

## **5 Legal Implications**

5.1 The Children and Families Act 2014 established duties for Clinical Commissioning Groups (CCGs) and Local Authorities (LAs) to improve the services for children with SEND. Regulations were published in the 2015 'Special educational needs and disability code of practice: 0 to 25 years'.

5.2 'Local areas' are required to have:

- a clear local offer of SEND support;
- arrangements for jointly commissioning SEND services;
- arrangements to introduce Education, Health, and Care Plans (EHCPs) to replace Statements of Special Educational Need, and to replace Learning Difficulty Assessments; and
- arrangement to support children with complex needs transition from child to adult services.

5.3 For the purposes of the regulations, the local area is the geographical area of the local authority.

- Brent local area responsibilities are for children with SEND needs who are resident in Brent, even if they attend educational establishments in under a different LA boundary.
- The responsibilities of the Brent local area are held collectively by Brent Council (including Children and Young People department and Public Health), NHS Brent CCG, NHS England, schools, early years settings, and other education providers.

## **6.0 Equality Implications**

6.1 Children with Special Educational Needs and Disability are a vulnerable group. The work of the Brent Children's Trust will improve the outcomes for these children.

## **Background Papers**

Children and Families Act 2014

Special Educational Needs and Disability code of practice:0 to 25 years.

Statutory guidance for organisations which work with and support children and young people who have SEND.

January 2015

Inspection report from Ofsted and the Care Quality Commission

Sent to Ms Gail Tolley, Director of Children's Services

Dated 13 July 2017, received 18 July 2017



**Contact Officers**

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## **Brent Children's Trust**

### **Written Statement of Action following SEND local area inspection, 2017**

#### **1. Introduction and context**

Brent local area was inspected between 15 May 2017 and 19 May 2017 by the Office for Standards in Education (OfSTED) and the Care Quality Commission (CQC) to gauge how effectively the area is delivering the improvements within the Special Educational Needs and Disabilities (SEND) reforms contained within the Children and Families Act 2014.

The inspection team deemed that although there were significant strengths within the local system there were key areas requiring improvement and on this basis that a written statement of action is required from the local area partnership led by Brent Council and NHS Brent Clinical Commissioning Group (CCG).

Brent Council and Brent CCG have responded to this requirement through the strong partnership of the Brent Children's Trust.

This Written Statement of Action has been agreed by the Brent Children's Trust and our Health and Wellbeing Board. It has been co-produced with parents, carers and professionals and sets out how services in Brent will work collaboratively with parents/carers and children and young people to take required action to improve outcomes.

Brent Children's Trust is focused on improving outcomes for children. The Written Statement of Action is underpinned by a Written Statement of Action Monitoring Dashboard, measuring progress against identified actions and impact on outcomes.

## 2. Brent Children's Trust Vision for Children with Special Educational Needs and Disabilities (SEND)

Brent Children's Trust has developed a vision for children with SEND, co-created by parents, carers and professionals across the partnership. It is:

***“To ensure that all children and their families have the fullest possible range of support and opportunities available to them in order to improve their life chances and realise their aspirations.”***

Alongside our local vision is that set out in the SEND Code of Practice, both of which underpin the cultural change to which we aspire. Trust partners are committed to developing inclusive communities, which are welcoming to all. To deliver this vision, Brent Children's Trust will:

- Put children and young people and their families at the heart of service design and delivery and ensure a person-centred approach;
- Enable children and young people and their families to only have to tell their story once and be able to rely on long-term relationships with professionals who work seamlessly together;
- Break down the cultural and structural divisions between agencies in the interest of improving outcomes for children and young people;
- Work together to jointly identify, plan change and improve; and
- Improve outcomes and life chances for children and young people with SEND.

### **What will it mean for Brent children and families?**

Brent Children's Trust have co-produced with parents and carers the following ambitions for delivery of services:

- Skilled teachers deliver effective interventions, meaning children and families get swift access to support, reducing the need for specialist services;
- A consistent therapist/ therapy team supports children through the time where support is needed, building strong relationships with the family which help a children thrive;
- Paediatricians, social workers and other professionals are supported to develop their expertise, acting as case holders and not referrers, ensuring consistency for children and families and building more effective joined up intervention;
- Integrated working means that young people experience seamless pathways to independence; and
- Children and families have places to play and activities where they feel safe and happy.

### 3. Partnership focus on outcomes and impact

The delivery of the Brent Children's Trust vision will make the following positive impacts for Brent children and young people. These outcomes will be monitored monthly through the improvement plan put in place by the Children's Trust Inclusion Strategic Board to ensure that the actions taken make the expected difference for Brent children and families.

- All children and young people with SEND including vulnerable groups receive timely support and access to services that help them maximise their potential.
- Professionals feel more confident in identifying SEND, have the skills to assess need and develop SMART outcomes for children and young people.
- Parents/carers are meaningfully participating in the design and delivery of services- '*do nothing about us without us*'.
- All parents/carers are actively engaged in the co-production of EHC Plans and agreeing outcomes for their child/young person.
- More young people with SEND have access to employment and community activities to support them to lead independent lives.
- The Local Authority and the CCG jointly commission services for children and young people with SEND to ensure that the right provision is in place and children and young people have access to the services they need.
- Children and young people with SEND make appropriate progress and outcomes are improved.
- Waiting times for access to services are reduced in line with national guidelines.
- Education Health and Care Plans are holistic in setting out all the needs of the child/young person, and are completed within required timescales.
- Parents/Carers have access to support and services through the Local Offer, including a range of short breaks.
- Parents/Carers report improved satisfaction with services that are better co-ordinated and reduce duplication – '*tell the story once*'.

#### 4. Key areas requiring action

This Written Statement of Action has been written in response to the local area inspection. It sets out a plan to respond to the five priority areas for action identified in the inspection. Actions are summarised below. These are cross referenced to our Written Statement of Action Monitoring Dashboard, a more detailed document that has been developed and driven by the local vision and national expectations for children with SEND.

Response to inspection concerns	Progress since the inspection, and further actions
<p><b>Strengthen CCG leadership in implementing the SEND reforms</b></p>	<p><b>Progress:</b></p> <p>NHS Brent CCG has ensured that all levels of the strategic leadership team have been made aware of the inspection feedback, and then been involved in defining the action plan. On 14 July 2017, the CCG Chair, Accountable Officer, and Clinical Directors signed off a CCG strategic plan to strengthen leadership in implementing the SEND reforms, and shared this with the Brent Children's Trust. The CCG Accountable Officer, and Chief Operating Officer met with the Brent Council Chief Executive and Director of Children's Services on 07 August 2017 to confirm high level CCG commitment to implementing the SEND reforms. The CCG Accountable Officer wrote to the London North West NHS Healthcare Trust Chief Executive on 09 September 2017 to confirm a joint approach to improving SEND health services.</p> <p>The CCG recruited an interim Designated Clinical Officer (DCO) and the same individual has been confirmed as a substantive DCO appointment, offering good continuity of work. There is a clear strategic plan, with appropriate links to the joint work between the CCG and Brent Council, as partners in the Children's Trust. The DCO also has a detailed work plan for strategic and operational issues. They work alongside a consultant paediatrician to provide quality assurance of health elements in EHC plans. They have been linked to the London-wide DCO network, to ensure Brent benefits from shared learning opportunities.</p> <p>The CCG is committed to strengthening its representation at the Children's Trust, which is chaired by the Brent Council statutory Director of Children's Services. The CCG Chief Operating Officer has formally become a member of the Children's Trust Board. This will strengthen the joint leadership of Brent Children's Trust to ensure mutual support and challenge of statutory duty compliance. The CCG in partnership with Brent Council is committed to embedding joint commissioning arrangements ahead of the new financial year. Joint commissioning of priority services identified in this inspection is underway.</p> <p>CCG leaders attended Brent Parent/Carer forum to ensure strong partnership leadership of parent/carers engagement and co-production from 01 September 2017. The CCG hosted workshops for SEND parents and carers on 21 September 2017, with over 45 attendees.</p> <p><b>Further Actions (WSOA1 in the attached WSOA Monitoring Dashboard):</b></p> <ul style="list-style-type: none"> <li>• CCG leaders will work with the Corporate Management Team of Brent Council to establish closer formal working arrangements between CCG and council in commissioning SEND, with a formal decision by 2018.</li> <li>• The Terms of Reference of the Children's Trust will be reviewed, with consideration given to extend membership to health providers, by 01 November 2017.</li> <li>• Joint Brent CCG and Brent Council strategic planning day to co-produce with parents and carers a refreshed joint SEND strategy in October 2017.</li> </ul>

Response to inspection concerns	Progress since the inspection, and further actions
<p><b>Implement joint commissioning arrangements to prevent gaps between services</b></p>	<p><b>Progress:</b></p> <p>Joint contract monitoring has been established from August 2017 to ensure services are accessible for young people with complex SEND 0-25 including the most vulnerable groups, and those in alternative educational settings (including Looked After Children, Pupil Referral Units, Youth Offending Service, and home-educated children).</p> <p>An interim joint commissioning post has been appointed to, starting at the end of September 2017. Interviews for a substantive post were held on 29 September 2017, with arrangements in place for interim cover to continue until the substantive post recruitment is completed.</p> <p>EY (Ernst and Young) were commissioned to support the development of further joint commissioning options. Their initial report has been received. The Council and CCG will begin implementation of joint commissioning in October 2017, with new arrangements in place by the end of December 2017. The implementation will be carefully monitored to maintain and improve the quality of joint commissioning across children's services.</p> <p>The local area has reviewed existing, separately contracted, service specifications for therapies (Occupational Therapy, Speech and Language Therapy, specialist nursing) to identify gaps. Commissioners have taken contractual action jointly to remove those gaps. The CCG has formally notified the existing provider of the need to disaggregate the costs of commissioned services within the contract, as preparation for a potential joint procurement with Brent Council.</p> <p>The CCG will lead the work of the Children's Trust with the Council of Disabled Children to advise on implementing the actions within this Written Statement of Action. A plan been agreed with the Council of Disabled Children to develop stronger joint commissioning and co-production with parents/carers and children in accordance with this statement of action, and to help improve the quality and clarity of information within the EHC plans.</p> <p><b>Further Actions (WSOA2 in the attached WSOA Monitoring Dashboard):</b></p> <ul style="list-style-type: none"> <li>• Brent Council and Brent CCG will align existing contracts with revised joint specifications in community paediatric therapies to address known gaps, particularly in speech and language therapy, in commissioned services and deliver a seamless service by 01 December 2017.</li> <li>• Brent Council and CCG will implement a process for joint contract management by 31 December 2017. Brent Council and Brent CCG will also formally establish joint commissioning arrangements for integrated paediatric therapy services (Speech and Language Therapy, Occupational Therapy, Physiotherapy) and specialist nursing services from April 2018.</li> <li>• Brent CCG will confirm the disaggregation of children's therapies costs from current community paediatric contracts, in accordance with national contracting timeframes. The CCG Governing Body on 10 January 2018 will meet in public to take assurance and confirm the joint contracting arrangements necessary to jointly commission integrated SEND services from 01 September 2018.</li> </ul>



Response to inspection concerns	Progress since the inspection, and further actions
<p><b>Address the lack of opportunity for therapists to respond to draft EHC plans before they are finalised</b></p>	<p><b>Progress:</b></p> <p>The process for therapists to respond to all EHCPs was partially evidenced in the inspection. Since the inspection, Brent Council and NHS Brent CCG have strengthened the process used to obtain London North West NHS Healthcare paediatric therapist input into EHC needs assessments and EHC plans. The Standard Operating Process agreed on 10 August 2017 includes arrangements to share draft versions with contributors, to ensure the process is as effective as possible.</p> <p>Brent Council and CCG have jointly monitored the completion of EHC plans to ensure that therapists have had the opportunity to comment on all plans before they are finalised. The newly appointed CCG DCO is involved in the tripartite process supporting EHC plan development, working alongside a consultant paediatrician to ensure health providers have feedback as part of a quality assurance and improvement process.</p> <p>The CCG will continue to ensure its commissioned providers are mobilised to contribute to EHC needs assessment and EHC plan development.</p> <p><b>Further Actions (WSOA3 in the attached WSOA Monitoring Dashboard):</b></p> <ul style="list-style-type: none"> <li>• The CCG will review the assurance process for the delivery of health services to meet the clinical needs identified in section G of the EHC plans by 31 October 2017.</li> <li>• Therapists will be supported by the DCO and Council for Disabled Children to provide information in a format that can be added to the EHC plan without the need for further summary. The CCG will confirm with Health providers the sign off and Quality Assurance process for all draft EHCPs prior to submission by 01 November 2017.</li> <li>• Brent Council and NHS Brent CCG will continue to monitor and ensure all paediatric therapists who contribute EHC needs assessment information are sent copies of draft EHC Plans for comment. The DCO will provide feedback to the Inclusion Strategic Board of the Brent Children's Trust to ensure the Standard Operating Process is reviewed and improved as necessary.</li> <li>• Quarterly partnership case sample audits to evidence improvement from November 2017.</li> <li>• Recommendations to deliver any further improvements to the joint EHC plan process to be implemented by 01 April 2018.</li> </ul>

Response to inspection concerns	Progress since the inspection, and further actions
<p><b>Ensure timely access to services for vulnerable groups of children and young people, particularly paediatric, diagnostic and therapy services.</b></p>	<p><b>Progress:</b></p> <p>Brent Council and CCG are working with London North West NHS Healthcare Trust to provide support and challenge around the recruitment of qualified paediatric therapists. Weekly tripartite monitoring of progress on improving timely access has been in place from 01 August, with improvement evidenced.</p> <p>CCG and London North West NHS Healthcare Trust confirmed contract variation timetable in-year. New specifications were agreed. The agreed specification for speech and language therapy ensures all Brent GP registered children have access, irrespective of educational setting.</p> <p>Additional two Occupational Therapists have been recruited, with start dates in October 2017.</p> <p>Audiology recruitment concerns have been escalated to NHS England due to the national shortage of audiologists.</p> <p><b>Further Actions (WSOA4 in the attached WSOA Monitoring Dashboard):</b></p> <ul style="list-style-type: none"> <li>• London North West NHS Healthcare Trust will continue to improve access to the service by maintaining a focus on recruiting more audiology and occupational therapy capacity and developing robust contingency plans (including partnerships with other providers) if recruitment is unsuccessful by October 2017.</li> <li>• CCG continuing to engage with Health Education England, North West London and London North West NHS Healthcare Trust to agree by a sustainable strategic workforce plan for paediatric therapy services by 31 January 2018.</li> <li>• CCG working with health providers will reduce waiting times to ensure assessments comply with NICE guidance, and begin within 3 months of referral for children with suspected autistic spectrum disorder, with completion within 6 months. Compliance expected by December 2017, evidenced by joint audit and case sampling.</li> <li>• CCG working with health providers will reduce waiting times for audiology services to meet the 6 week diagnostic target, and the 18 week referral to treatment target (RTT). Compliance expected by December 2017, evidenced by joint audit and case sampling.</li> <li>• CCG working with health providers will reduce waiting times for occupational therapy (OT) services to meet the 18 week RTT. Compliance expected by December 2017, evidenced by joint audit and case sampling.</li> <li>• Brent Council and Brent CCG through joint commissioning activities and contract variation will ensure that vulnerable groups will be supported to access services by November 2017. This will include children receiving elective home education in accordance with the proposed duties set out in The Home Education (Duty of Local Authorities) Private Members Bill 2017-19.</li> </ul>

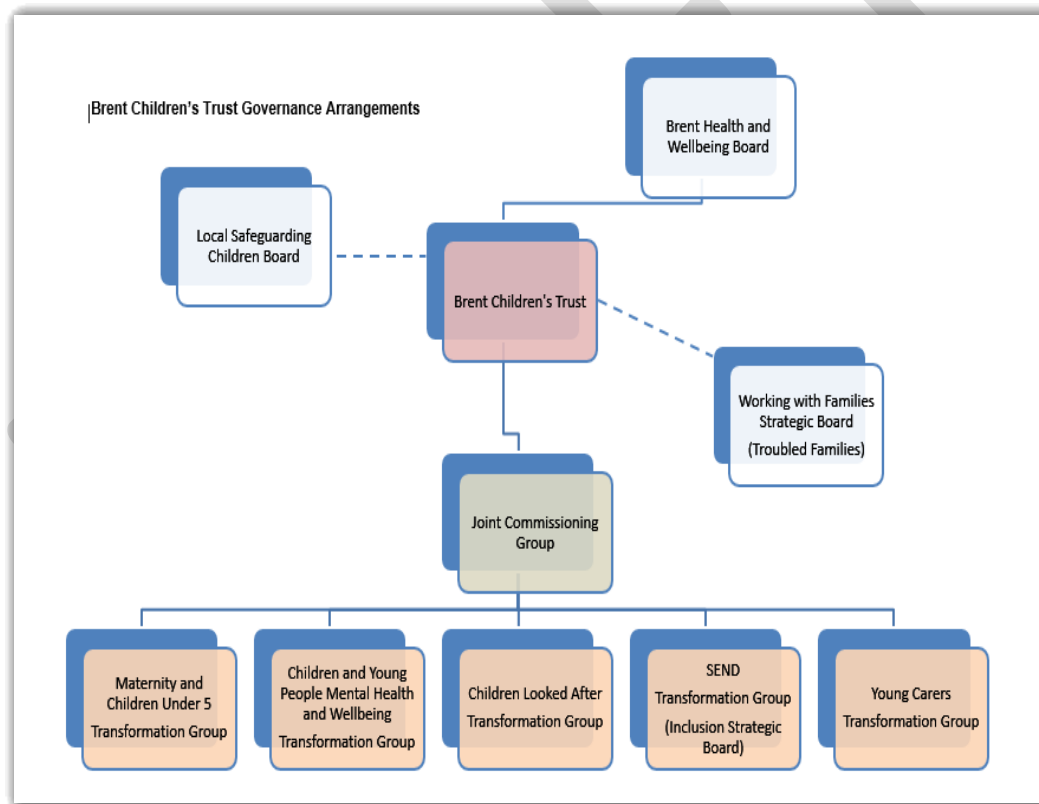
Response to inspection concerns	Progress since the inspection, and further actions
<p><b>Improve the opportunities for parental involvement when commissioning and designing services</b></p>	<p><b>Progress:</b></p> <p>Brent Council and CCG have responded positively to the challenge and opportunity raised by parents in the inspection for us to work together with parents to make a difference. Brent Council and CCG have significantly strengthened the engagement of parent/carers through a more robust model for targeted engagement, bringing together the relaunched Parent/Carer forum with Brent CCG'S Equality, Engagement, and Self-care (BEES) sub-committee.</p> <p>Brent Council is supporting the Westminster Society to strengthen the Parent/Carer Forum and establish a system of parent champions. Brent CCG formalised coordination of engagement with HealthWatch in September 2017. These actions enable more effective use of resources to support parental engagement, adding to the coherence and impact of parental engagement in Brent.</p> <p>The Brent Children's Trust Inclusion Strategic Board has established four work streams to take developments in SEND forward. Each has an identified lead and parent representatives. The work streams focus on areas for development informed by the Area SEND inspection: The Local Offer and Short Breaks development; EHC Plans, processes and quality assurance; transition to adulthood; and joint commissioning of services for children and young people with SEND.</p> <p>Brent Council and Brent CCG have strengthened monitoring and can confirm all parents/carers are invited to attend a co-production meeting to draft the EHC Plan, and all parents/carers are sent a feedback form with every EHC Plan issued. The take up of meetings is improving, and schools are supporting this process. Translators are used as necessary.</p> <p>A new standing CCG forum for parents of children with SEND accessing CAMHS was established, with the first meeting on 06 June 2017, attended by parents and young people. Targeted joint engagement events to support coproduction were in place from September 2017. The CCG hosted workshops for SEND parents and carers on 21 September 2017, with over 45 attendees. A Brent-wide Health Partners Forum has been booked for 18 October 2017 to feedback on SEND and CAMHS engagement to date, showing how the views of young people and parents/carers have informed our joint commissioning intentions.</p> <p><b>Further Actions (WSOA5 in the attached WSOA Monitoring Dashboard):</b></p> <ul style="list-style-type: none"> <li>• Targeted engagement dates agreed with schools with the first school based co production event 30 September 2017</li> <li>• Feedback on parent priorities "You Said, We Did" to Health Partners Forum is scheduled for 18 October 2017</li> <li>• Revised commissioning informed by co-production with parents and carers by April 2018</li> </ul>

## 5. Governance of the Written Statement of Action – Brent Children’s Trust

Partnership work led by Brent Children’s Trust, chaired by Brent Council statutory Director of Children’s Services, has been identified as an area of strength in the inspection. Particularly, the strength of partnership activity with special schools as well as mainstream schools was noted. We are building on this strength to further drive improvement for children.

The Brent Children’s Trust is monitoring the delivery of actions to ensure that agencies accountable for actions stay focused on improvements identified. Children’s Trust Board members are monitoring delivery of actions on a weekly basis through formal provider contact monitoring.

The Children’s Trust will monitor the delivery of the Written Statement of Action and Local Area Improvement Plan on a bi-monthly basis, reporting on progress to Brent Health and Well-being Board every 6 months. Brent Council Community Wellbeing Scrutiny Committee will be reported to on progress on the 22 November 2017, to ensure transparency and challenge through local democratic accountability. Provisional dates for quarterly monitoring the Written Statement of Action and Local Area Improvement Plan have been agreed with NHS England and the Department for Education.





# Written Statement of Action Monitoring Dashboard 29 Sep'17

WSOA1 75% done, 25% in progress, 0% not started  
WSOA2 20% done, 80% in progress, 0% not started  
WSOA3 67% done, 34% in progress, 0% not started  
WSOA4 0% done, 100% in progress, 0% not started  
WSOA5 50% done, 50% in progress, 0% not started

Key Actions		Lead	Objective	Target Date	Progress	Progress milestones and evidence
Green text shows completed actions, black text shows incomplete actions						
WSOA1 75% done, 25% in progress, 0% not started Page 17	Strengthen CCG leadership in implementing the SEND reforms	CCG Dionne Greenaway Senior Commissioning Manager  Duncan Ambrose Assistant Director  Dr Sarah Basham Vice Chair	A) Update SEND strategic plan to ensure CCG Chair and Chief Officer have oversight of actions to deliver SEND reforms	Wednesday 19/07/2017	Done	Draft strategic plan shared at Brent Children's Trust, Jul'17. CCG Executive Committee agreed strategic plan Jul'17. Shared with NHS England London Regional Lead for SEND, Aug'17. SEND plan shared with CCG Integrated Governance Committee Aug'17.
		CCG Dionne Greenaway Senior Commissioning Manager	B) Appoint a Designated Clinical Officer (DCO) to support the CCG implement SEND reforms	Friday 29/09/2017	Done	DCO substantive post agreed May'17. Role development discussed with NHS England London Regional Lead for SEND 11 Aug '17.  Role development discussed with existing NWLCCG DCOs, and agreed NWLCCG peer reviews 13 July '17. Invitation to pan-London DCO/DMO meeting. DCO linked into NHS England London Regional Lead for SEND 14 Sep '17 Brent CCG agreed 0.6 FTE role designed to complement existing paediatrician reviewing 0-18s EHCPs, and CCG-LD clinical lead. Post to be shared with Harrow CCG and Hillingdon CCG. Substantive budget confirmed in review of CCG staffing, Aug'17. May'17 DCO recruitment unsuccessful. Re-advertised Aug'17, interview 06 Sep'17. Interim recruitment confirmed 22 Aug'17, candidates identified and available. Interim in post by 29 Sep'17, to allow 3 months cover during substantive notice period. Interim confirmed as substantive DCO 29 Sep '17
		CCG Duncan Ambrose Assistant Director  Sheik Auladin Chief Operating Officer	C) CCG leaders work with the Corporate Management Team of Brent Council to establish closer formal working arrangements between CCG and council in commissioning SEND. Strengthen CCG leadership within Brent Children's Trust to ensure CCG commissioned health aspects are adequately considered and represented, and to give mutual support and challenge of statutory duty compliance. Terms of Reference of the Children's Trust review, to consider extending membership to health providers.	Wednesday 01/11/2017	In progress	Senior CCG and LA officers developing WSOA and dashboard. CCG Accountable Officer, and Chief Operating Officer met with the Brent Council Chief Executive and Director of Children's Services on 07 August 2017 to confirm high level CCG commitment to implementing the SEND reforms Joint monitoring at Brent Children's Trust 12 Sep'17. CCG statutory duties summarised clearly as part of the planning process 14 Jul'17. Reporting on WSOA to Health and Wellbeing Board 05 Oct'17. Review of Children's Trust Terms of Reference Nov '17 Assurance on progress via Community and Wellbeing Scrutiny Committee 22 Nov'17. Case study demonstrating the action and impact through the Children's Trust Dec '17.
		CCG Duncan Ambrose Assistant Director	D) CCG leaders will attend Brent Parent/Carer forum to ensure strong partnership leadership of parent/carers engagement and co-production from 01 September 2017.	Friday 01/0/2017	Done	CCG attended Brent Parent/Carer Forum 14 Sep'17 to consult on Written Statement of Action. Vision for future delivery co-produced with attendees and included in WSOA. CCG led co-production events 21 Sep'17 well attended by parents. Joint Brent CCG and Brent Council strategic planning day to co-produce with parents and carers a refreshed joint SEND strategy October '17.



	Key Actions	Lead	Objective	Target Date	Progress	Progress milestones and evidence
Page 18	WSOA2 20% done, 80% in progress, 0% not started  Implement joint commissioning arrangements to prevent gaps between services	CCG Dionne Greenaway Senior Commissioning Manager  LA Sandra Bingham Head of Inclusion	A) Establish new joint commissioning post to support SEND and CAMHS improvements	Friday 15/09/2017	Done	Joint funding confirmed and job description agreed, 25 Jul'17. CCG leading substantive recruitment, 08 Aug'17. LA leading interim recruitment, out to advert, 18 Aug'17. Interim appointment made 15 Sep'17. Interviews for permanent post 29 Sep '17. Quality check of children's services joint commissioning arrangements through EY option appraisal 29 Dec '17
		CCG Dionne Greenaway Senior Commissioning Manager  Duncan Ambrose Assistant Director  Dr Sarah Basham Vice Chair  LA Sandra Bingham Head of Inclusion  Brian Grady Operational Director	B) Joint Brent CCG and Brent Council strategic planning day to co-produce with parents and carers a refreshed joint SEND strategy in October 2017.	Tuesday 31/10/2017	In progress	Parent/Carer engagement events in September have provided a list of priorities for co-production day in October. Brent Council SEND strategy 2014-2017 and Brent CCG strategic review document 2017 being used to prepare refresh proposals for event in October.
		CCG Sheik Auladin Chief Operating Officer  LA Gail Tolley Strategic Director (DCS)	C) Establish closer formal working arrangements between CCG and LA in commissioning SEND	Wednesday 22/11/2017	In progress	ITT developed for scope of joint CCG-LA commissioning teams for SEND 07 Aug'17.  Joint Contract Monitoring established Aug' 17 CCG Chief Officer and Chief Operating Officer discussed with LA CEO and DCS 07 Aug'17. Strong appetite from both council and CCG to integrate commissioning of SEND services. Potential for integrated commissioning arrangements to be broadened to cover other service areas in the future. EY completed baseline commissioning structure options appraisal 14 Aug'17. Next stage procurement to agree development of joint commissioning structures launched Aug '17 with evaluation Sep '17 Options appraisal Oct '17 to compare incremental approach (service by service) to whole-scale integration. CCG Executive Committee to confirm preferred option 22 Nov'17. CCG Governing Body 10 Jan'18 to take assurance and confirm the joint contracting arrangements necessary to jointly commission integrated SEND services.
		CCG Dionne Greenaway Senior Commissioning Manager  Duncan Ambrose Assistant Director LA Sandra Bingham Head of Inclusion	D) Implement revised specifications in community paediatric therapies to address known gaps in CCG commissioned services	Friday 01/12/17	In progress	Specifications developed to cover all CCG registered children, 31 Mar'17. Timetable for implementation agreed with LNW, 17 May'17. Agreed process to finalise specifications, 13 Jul'17. Scope jointly reviewed to identify any remaining in LA commissioned services, 22 Aug'17. Confirm alignment of special school services, 12 Oct'17. Confirm LWN readiness to deliver revised specification, 05 Oct'17. Formal contract variation 02 Nov'17.
		CCG Dionne Greenaway Senior Commissioning Manager  LA Sandra Bingham Head of Inclusion	E) Jointly commission integrated paediatric therapy services (SLT, OT, PT) and specialist nursing services.  Ensure services accessible for young people with complex SEND 0-25 including the most vulnerable groups, and those in alternative educational settings (e.g. LAC/ PRU/ YOS/ Home educated), in particular <b>speech and language therapy</b> .	Monday 02/04/2018	In progress	CCG and LNW agree timetable for contract variation for paediatric therapies, addressing known gaps in SLT provision, 15 May'17. Map existing SEND pathways in CCG and LA contracts, 15 Sep'17. CCG and LNW confirm revised service specifications to cover all CCG GP registered children for SLT irrespective of education setting, 20 Sep'17. CCG write to LNW with strategic commissioning intentions, 29 Sep'17. Plan Council for Disabled Children facilitated workshop for commissioners and providers to review pathways, statutory duties, and develop options, 29 Sep'17. Targeted engagement with service users, schools, and HealthWatch to explore different options, then report findings at Health Partners Forum 18 Oct'17. Clarify existing resource, and estimate future resource requirements. CCG and LNW contract variation to introduce new aligned specifications in-year, Nov'17. Options appraisal on preferred option, 22 Nov'17. Aligned Brent Council and CCG contracts Dec '17 Contract award, with mobilisation and contract monitoring from 02 Apr'18. Review of Health Questionnaire to assess and confirm needs and requirements.

Key Actions		Lead	Objective	Target Date	Progress	Progress milestones and evidence
<b>WSoA3</b> 67% done, 34% in progress, 0% not started	<b>Address the lack of opportunity for therapists to respond to draft EHC plans before they are finalised</b>	<b>CCG</b> Dionne Greenaway Senior Commissioning Manager  <b>LA</b> Sandra Bingham Head of Inclusion	<b>A)</b> Strengthened EHCP process to obtain more consistent health professional input to EHCPs and for drafts to be shared	Friday 15/09/2017	<b>Done</b>	Changes agreed Aug '17 Monitoring of input and sharing of drafts picked up through contract monitoring Sep '17 CCG confirm with health providers sign off and Quality Assurance process for draft EHCPs 01 Nov '17 Recommendations to deliver any further improvements to the joint EHC plan process to be implemented by 01 Apr '18 Quarterly partnership case sample audits to evidence improvement from Nov '17
		<b>CCG</b> Dionne Greenaway Senior Commissioning Manager  <b>LA</b> Sandra Bingham Head of Inclusion	<b>B)</b> CCG and LA review assurance process for the delivery of paediatric therapy services	Tuesday 31/10/2017	<b>In progress</b>	DCO work plan to include quality assurance feedback to health providers, 27 Sep'17. Process review underway working with all health providers, 31 Oct'17
		<b>CCG</b> Dionne Greenaway Senior Commissioning Manager  <b>LA</b> Sandra Bingham Head of Inclusion	<b>C)</b> Ensure all paediatric therapists who contribute EHC needs assessment information are sent copies of draft EHC Plans for comment	Friday 01/09/2017	<b>Done</b>	Standard Operating Procedure with LNW to contribute to EHCP, 02 Aug'17. Distribution process has been agreed with health and a training programme has been implemented for all professionals 01 Sep'17 Sharing of drafts being confirmed through weekly contract monitoring
<b>WSoA4</b> 0% done, 100% in progress, 0% not started	<b>Ensure timely access to paediatric diagnostic and therapy services.</b>	<b>CCG</b> Dionne Greenaway Senior Commissioning Manager  Diane Jones Director of Quality and Safety  <b>LNW</b> Dr John Hutchins Clinical Director  Maria Luscombe Head of Paediatric Therapies	<b>A)</b> London North West NHS Healthcare Trust to improve access to the service by maintaining a focus on <b>recruitment</b> for audiology and occupational therapy capacity and developing robust contingency plans (including partnerships with other providers) if recruitment is unsuccessful by October 2017.	Friday 20/10/17	<b>In progress</b>	Use interim cover to address vacancies. Two FTE OTs in post from September 2017 Recruitment process for occupational therapists Recruit process for community audiologist Weekly monitoring by commissioners of recruitment progress, 08 Aug'17. Develop contingency plans if recruitment unsuccessful CCG Director of Quality to liaise with HENWL about future needs, 27 Oct'17. Deploy additional OT capacity Deploy additional audiology capacity
		<b>CCG</b> Dionne Greenaway Senior Commissioning Manager  Duncan Ambrose Assistant Director  Dr Sarah Basham Vice Chair  <b>LNW</b> Dr John Hutchins Clinical Director  Maria Luscombe Head of Paediatric Therapies  <b>CNWL</b> Jackie Shaw Service Director for CAMHS	<b>B)</b> Reduce waiting times to ensure assessments comply with NICE guidance, and begin within 3 months of referral for children with suspected <b>autistic spectrum disorder</b> , with completion within 6 months	Friday 29/12/17	<b>In progress</b>	LA confirmed ASD diagnosis not required for EHC plan, only to access BOAT service. CCG, LA, and LNW confirmed functional benefit for ASD cases is available from SLT service.  Average 7 month wait for completion of ASD assessment (56 cases > 6 months). Only 0.9% of ASD cases had previously unknown medical issue. CCG supported LNW proposal for GPs and psychiatrists to screen rather than refer all cases to paediatricians. NLW-wide clinical pathway discussion about role of GPs and psychiatrists, 25 Aug'17. CCG, LNW, and CNWL to revise clinical pathway and potential joint clinics, 13 Sep'17. LNW re-prioritisation of clinical work to ensure the 56 cases are completed by 29 Dec'17. Brent CCG lead of Healthy London Partnership ASD support mapping - reporting on services and priority gaps 29 Dec '17. Monitor any revised NICE guidance emerging from the current review.

Key Actions		Lead	Objective	Target Date	Progress	Progress milestones and evidence
Page 20 WSOA5 50% done, 50% in process, 0% not started	Improve the opportunities for parental involvement when commissioning and designing services	<u>CCG</u> Dionne Greenaway Senior Commissioning Manager  <u>Duncan Ambrose</u> Assistant Director  <u>Dr Sarah Basham</u> Vice Chair  <u>LA</u> Melanie Smith Director of Public Health  <u>LNW</u> Dr John Hutchins Clinical Director  Maria Luscombe Head of Paediatric Therapies	<b>C)</b> Reduce waiting times for <b>audiology</b> services to meet the 6 week diagnostic target, and the 18 week referral to treatment target (RTT)	Friday 08/12/17	In progress	Difficulty recruiting audiologists. 3 cases waiting more than 6 weeks for diagnostics; 96% achievement of RTT. LNW locum audiovestibular physician recruited, 23 Jun'17. Weekly teleconference to monitor waits, vancancies, and action plans, 08 Aug'17. CCG formally wrote to LNW CEO to accelerate actions, 14 Aug'17 Exploring capacity in other teams and providers, 22 Aug'17. Escalated concerns to NHS England London Regional Lead for SEND, 22 Aug'17. Public Health confirm 2-year-old hearing check meeting targets, 25 Aug'17 LNW decision on 12 additional clinics blitz to achieve 6 week target, 15 Sep'17. LNW community audiologist starts 15 Sep'17. LNW decision on potential increase in audiovestibular physician hours, 12 Oct'17. Reconfigure admin to free up more clinical time, 12 Oct'17. Meet 6 week target 08 Dec'17. Joint Audit planned from Dec '17
		<u>CCG</u> Dionne Greenaway Senior Commissioning Manager  <u>LA</u> Sandra Bingham Head of Inclusion	<b>D)</b> Brent Council and Brent CCG will ensure joint commissioning activities provide assurance from providers that <b>vulnerable groups</b> will be supported to access services from October 2017	Tuesday 31/10/2017	In progress	Agree 'stage zero' process to scope services for potential joint commissioning of paediatric therapies Sep'17, including contract variations to ensure that vulnerable groups can access services. Undertake Equality Impact and Needs Assessment for re commissioning Oct '17 Review options and confirm scope
		<u>CCG</u> Dionne Greenaway Senior Commissioning Manager  <u>LA</u> Sandra Bingham Head of Inclusion  <u>LNW</u> Dr John Hutchins Clinical Director  Maria Luscombe Head of Paediatric Therapies	<b>E)</b> Reduce waiting times for <b>occupational therapy</b> (OT) services to meet the 18 week referral to treatment target (RTT)	Friday 29/12/17	In progress	4 children waiting longer than 18 weeks (22 weeks longest) for treatment. Weekly teleconference to monitor waits, vacancies, and action plans, 08 Aug'17. CCG contract maternity leave and sickness. Agency staff interviews 16 Aug'17, appointments 30 Aug'17. CCG and LNW clarified costs for additional agency staff, 22 Aug'17. LA and LNW reviewed all children's EHCPs to determine staff capacity needed, 25 Aug'17. LNW confirmed trajectory for recovery of RTT compliance, 01 Sep'17. LA commissioned staff for new school term, 04 Sep'17. OT recruitment difficulty escalated to NHS England London Region SEND lead for advice, 26 Sep'17. Achieve RTT compliance, 29 Dec'17. Joint audit planned from Dec '17.
Page 20 WSOA5 50% done, 50% in process, 0% not started	Improve the opportunities for parental involvement when commissioning and designing services	<u>CCG</u> Michelle Johnson Head of Engagement  <u>LA</u> Sandra Bingham Head of Inclusion  <u>Brent Parent/Carer Forum</u> Carol Foyle	<b>A)</b> Strengthen Parent/Carer Forum involvement in commissioning	Wednesday 14/09/17	Done	Parent-Carer Forum re-launched.  Community and Wellbeing Scrutiny Committee recommended schools and community CAMHS engagement, 19 Jul'17. Coordinated with relaunched Parent/Carer Forum Aug '17.  Parent/Carer Forum contributed to WSOA 14 Sep'17. Targeted joint engagement event dates sent for families using SEND services, working with Parent/Carer Forum 08 Sep'17. CCG engagement workshops for SEND parents 21 Sep'17. Parent/Carer Forum regular updates on progress of WSOA commencing Nov '17
		<u>CCG</u> Dionne Greenaway Senior Commissioning Manager  Michelle Johnson Head of Engagement  <u>LA</u> Nigel Chapman Operational Director (Chair Inclusion Strategic Board)  <u>HealthWatch</u> Ian Niven Head of HealthWatch Brent	<b>B)</b> Fully engage parents and carers in the workstream of the inclusion strategic board to develop and plan services through co-production	Friday 10/11/2017	In progress	Standing forum for CAMHS established, Sep'17. CCG and HealthWatch agreed to coordinate engagement, including the Parent/Carer forum, 22 Sep'17. Strategic inclusion work streams identify parent and young persons representatives, 29 Sep'17. Targeted engagement dates agreed with schools, 29 Sep'17. Feedback 'You said, we did' at Health Partners Forum, 18 Oct'17. Parent/Carer involvement in service reviews commences through work streams Nov '17 Parent/Carer involvement in revision and implementation of refreshed service specifications Nov '17 Parent/Carer involvement in procurement processes from Jan '18