

	<p align="center">Community and Wellbeing Scrutiny Committee 22 September 2022</p>
	<p align="center">Report from Corporate Director Children and Young People</p>
<p align="center">Implementation of the SEND Review and the High Needs Block</p>	

Wards Affected:	All
Key or Non-Key Decision:	N/A
Open or Part/Fully Exempt: <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
No. of Appendices:	<ol style="list-style-type: none"> SEND Support in Brent 2022 SEND Strategy 2021-2025
Background Papers:	<p>https://www.gov.uk/government/publications/send-code-of-practice-0-to-25</p> <p>https://www.gov.uk/government/publications/opportunity-for-all-strong-schools-with-great-teachers-for-your-child</p> <p>https://www.gov.uk/government/consultations/send-review-right-support-right-place-right-time</p>
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1.0 Purpose of the Report

- 1.1 This report provides an overview of services for Brent children and young people with Special Educational Needs and Disabilities (SEND) and a summary of the SEND Review Green Paper and the new Ofsted/CQC inspection framework. It sets out

Brent's readiness for the implementation of the Green Paper, the new Inspection Framework, the current position of High Needs Block funding for children with SEND and potential future funding implications in light of future national policy directions.

2.0 Recommendation(s)

2.1 The Community and Wellbeing Scrutiny Committee is asked to note and comment on the content of the report.

3.0 Background: What is SEND?

3.1 The Children and Families Act 2014 defines Special Educational Needs and Disability (SEND) in the following way:

- **Special Educational Needs.** A child or young person has special educational needs if he/she has a learning difficulty or a disability which calls for special educational provision to be made or them.
- **Learning Difficulty.** A child or a young person of compulsory school age has a learning difficulty or disability if they:
 - Have a significantly greater difficulty in learning than the majority of others the same age, or
 - Have a disability which prevents or hinders them from making use of facilities of a kind generally provided for others of the same age in mainstream schools or mainstream post-16 institutions or in employment without support.

3.2 The legal duties introduced in The Children and Families Act 2014 place responsibilities on the local area partnership (the local authority, health partners, settings, schools and colleges) to identify and meet the needs of children aged 0-25 who have SEND. How the Act should be interpreted is set out in the SEND Code of Practice 2015. The duties and reforms to the SEND system introduced in 2014 aspire to achieve an integrated 0-25 system spanning education, health and care, driven by high ambition and preparation for adulthood.

3.3 The Bent SEND Strategy 2021-25 (Appendix 1) details the Brent Children's Trust vision, ambitions and current priorities for children with Special Educational Needs and/or Disabilities (SEND). The Strategy was co-created by parents, carers and those who work with them across the partnership. The Strategy is the vehicle for the Partnership to express how it is implementing the Code of Practice 2015 and builds on the work undertaken under the previous 2018-21 SEND Strategy. The SEND Support in Brent Booklet (Appendix 2) provides a useful background to key elements of the local SEND system.

3.4 The Government initially launched the national SEND Review in 2019 in response to growing concern about the challenges facing the SEND system in England and the future of the children and young people it supports. Successive public reports, including those from the Education Select Committee, the National Audit Office, and the Public Accounts Committee, highlighted a range of challenges to be addressed. The SEND Review committed to examining how the system has evolved since 2014, how it can be made to work best for all families and how it can ensure the effective and sustainable use of resources. The Green Paper SEND Review: 'Right Support, Right Place, Right Time' was launched in March 2022. The Green Paper consultation concluded in July 2022 and the government response on next steps is awaited.

3.5 The DFE recommends that the SEND Green Paper is read alongside reforms to health and social care, including the introduction of Integrated Care Systems and wider reforms to adult social care. The paper also needs to be read alongside the May 2022 Independent Review of Children's Social Care

<https://childrensocialcare.independent-review.uk/> and the Schools White Paper: 'Opportunity for All' March 2022.

- 3.6 The SEND review identifies three key challenges facing the SEND system nationally:
- a) **Challenge 1:** outcomes for children and young people with SEN or in alternative provision are poor;
 - b) **Challenge 2:** navigating the SEND system and alternative provision is not a positive experience for children, young people and their families;
 - c) **Challenge 3:** despite unprecedented investment, the system is not delivering value for money for children, young people and families.
- 3.7 To address these challenges the SEND green paper signals the intention to:
- 3.7.1 Implement a single national SEND and alternative provision system with proposals for an inclusive system, starting with improved mainstream provision that is built on early and accurate identification of needs, high quality teaching of a knowledge-rich curriculum, and prompt access to targeted support where it is needed.
 - 3.7.2 Implement nationally consistent standards for how needs are identified and met at every stage of a child's journey across education, health and care. All local authorities will be required to introduce a digitised EHCP process, conflict resolution via mandatory mediation rather than the first level tribunal system only and an Inclusion Plan with a tailored list of settings, that are appropriate to meet the child or young person's needs.
 - 3.7.3 Introduce new statutory guidance to Integrated Care Boards (ICBs) to set out clearly how statutory responsibilities for SEND should be discharged, a new performance framework and a new national framework of banding and price tariffs for funding SEND provision.
- 3.8 Ofsted and the CQC are also consulting on a new Inspection Framework for local area inspections of SEND arrangements that aligns with the Green Paper. The aim in introducing a new framework is to promote further improvement in the SEND system. This will be achieved by strengthening accountability and focusing on the features that make local area arrangements most effective in improving the lives of children and young people with SEND, so that they are well prepared for education, employment, independent living and participation in society, and able to have as healthy a life as possible. The new framework is anticipated to come into force from early 2023.

4.0 Brent's readiness for the implementation of the Green Paper and the new Inspection Framework

SEND Prevalence

- 4.1 As at August 2022 there were 3118 children and young people aged 0-25 with an Education, Health and Care Plan (EHCP), 43% of whom are autistic. Table 1 below shows that there has been a year on year increase in the numbers of children and young people that are effectively identified as requiring statutory support through an EHCP. A peak in growth in the SEND cohort emerged in 2020/21 when the number of EHC Plans in Brent rose by 15% compared to the previous year. In 2021/22 the rise in the number of maintained EHC Plans slowed in Brent, growing by 6%, at a time when

England and Brent's statistical neighbours saw larger increases at 10% and 9% respectively.

Table 1

Financial Year	2017/18	2018/19	2019/20	2020/21	2021/22	August 2022/23
Number of EHCPs	2,076	2,173	2,426	2,784	2,938	3118
Brent Year on Year % Increase	6%	5%	12%	15%	6%	6%
National Year on Year % Increase	11%	11%	10%	10%	10%	10%

- 4.2 In 2021/22 the number of initial requests for assessment in Brent reduced by 6% compared to 2020/21 levels. This is primarily due to the steps taken by the SEND partnership to meet the needs of children earlier through activities delivered in mainstream school settings. There were 69% of children and young people issued with an EHCP in 2021 in mainstream settings compared to 48% in 2020. Whilst there has been a 4.6% reduction in the number of children under 5 years old being identified with SEND in 2021/22, this is likely to be a consequence of the pandemic and the real rate is yet to emerge.

Partnership Activity

- 4.3 The SEND partnership is well established in Brent through the Children's Trust and the Inclusion Strategic Board that reports to the Children's Trust. The 2019 Ofsted/CQC joint local area SEND Inspection revisit evidenced good progress had been made to '*fully embrace the spirit of the SEND reforms and (partners had) worked together in partnership to make a positive difference to the lives of children and young people with SEND in Brent.*' There is a strong sense of collaboration across health, education and care, the Brent Parent Carer Forum (that has over 500 members) and a young people's network. Co-production is at the heart of all strategic developments in Brent and operates on a 'nothing about you without you' approach. This is clearly demonstrated in the development of the SEND Strategy 2021-25, the ongoing oversight of the Local Offer/Preparation for Adulthood website and, more recently, in the design of a new neurodiversity pathway. This pathway will look to strengthen the offer in the community, supporting parents to support their children, and strengthen the specialist intervention offer. Neurodiversity refers to Autistic Spectrum Disorder, Attention Deficit Hyper-activity Disorder, Tourette's and special learning difficulties including dyslexia.
- 4.4 Systems for the early identification of need are well embedded. Multiagency decision-making panels and collaborative funding arrangements ensure that children and young people's needs are being met.
- 4.5 Brent Council leads a robust Brent education partnership that works collaboratively to deliver inclusive schools. The main focus over the last two academic years has been on developing the capacity of mainstream schools in Brent to identify pupils with SEN needs early. The Children and Young People Department has led a number of developments to improve the SEND offer. This includes leading a new Graduated Approach (GAF) for children with a SEN need who do not require an EHCP (a way of meeting needs through earlier identification), a SENCO training programme and further investment through the High Needs Block of the Dedicated Schools Grant (DSG) (£0.5m SEND Intervention Fund) in the development of the capacity of school

staff to ensure children and young people with SEND achieve good educational outcomes. The impact of this is beginning to gain traction as the numbers of pupils on SEN support is beginning to increase (evidenced in the School Census); requests for EHCPs rose 5% in 2021 compared to 15% in 2020; and in February 2022 69% of pupils with SEND were in mainstream, compared to 48% in 2020. This work is being extended into early years settings, ensuring that needs are identified earlier than before and specialist place planning can therefore be planned more effectively.

- 4.6 Due to the expansion in the numbers of children and young people identified with SEND over the past few years, there are insufficient local places for Brent children of both primary and secondary age and in the 16-25 age group. In response the Council has developed a capital programme to meet demand and reduce dependence on out-of-borough independent special schools, which are expensive and can long journeys for vulnerable children and limit the access of children and their families to support networks. In January 2022 Cabinet approved £44m of capital investment for 427 additional specialist places across mainstream and specialist provision, including a new secondary special school. The expectation is that the places will be made available over the next two academic years. There is still a need for the borough to develop post-16 SEND provision to meet demand for places for young people with SEND, in particular young people aged 16-25 with complex learning difficulties and work is in development in this area.
- 4.7 In 2019, the Council supported the creation of a new Alternative Provision School – the Roundwood School and Community Centre. The school is run by the Beckmead Trust and was established to respond to an identified need for local alternative provision to meet the needs of local children who cannot settle in mainstream provision. The school received referrals from local schools as well as the local authority.
- 4.8 In March 2022 the Council recognised the need to expand the capacity of SEND services to meet the needs of the increasing number of children being identified earlier with a special educational need. Included within this expansion is a dedicated SEND resolutions officer able to meet the requirement for mandatory mediation meetings expected to be a key outcome of the new statutory duties arising from the Green Paper.
- 4.9 The Council has invested in a digital case management system to make it easier for multi-agency partners (including parents) to share information about individual children. Steps have also been taken to improve collaboration with families to enable a better experience of the SEND system through improved transparency and shared decision making.
- 4.10 A robust multiagency quality assurance and performance framework is in place. Parents/carers and young people regularly provide feedback on their satisfaction with services. This not only ensures improved quality of provision but also the implementation of meaningful and appropriate EHCPs through casework commencing at the point of referral and SMART assessments. An example of responding to feedback from children and young people is the Council's recognition that there is a need to expand the short breaks offer for young people in Brent, through both an increase in targeted and inclusive activities. From October 2022 the Council has agreed to highlight SEND as part of the NCIL grant funding programme, supporting more targeted or inclusive activities for young people with SEND.
- 4.11 The Council, working with anchor organisations, has expanded the offer of supported internships – organisations committed to providing dedicated employment opportunities for young people with SEND. There have been 35 Supported Interns to

date, 12 of whom had placement rotations in the Council and Wembley hotels. The remaining interns were located within the Imperial College Healthcare NHS Trust. The Council is looking to support employers across Brent to be autism aware and to expand the number of employers who are achieving the disability confident standards. Brent Works and CYP lead the supported employment forum and through continued development of the post 16 offer, the Brent Partnership will enable more young people with SEND to secure meaningful employment and improved life chances. The aim is to support young adults to become more independent and economically active, no longer requiring the additional provision of an EHCP.

4.12 Whilst the focus for the last two years has been in strengthening earlier intervention and the quality, impact and experience of the SEND system, there are areas that require further enhancement. This includes;

- a) Enhanced support in early years supporting children to be ready for school and providing the catch up that is required to meet emerging needs as a consequence of the pandemic. Work is underway through the early years graduated approach framework to develop the capacity of early years teams in meeting learning needs. Funding from year two of the SEND Implementation Fund will be used to support this.
- b) The implementation of the neurodevelopment pathway will require the joint commissioning and delivery of targeted and specialist support with health. There is a need to increase the support for families in the community through Brent's new Family Wellbeing Centres (linked directly to meeting the needs of children earlier);
- c) Rethinking how integrated therapies can be delivered is a common theme emerging across all local SEND partnerships, alongside the joint commissioning of the right support at the right time;
- d) Establishing a new approach to supporting vulnerable CYP as a consequence of the changes in school attendance, alternative provision and an improved oversight and transparency of pupil movements including placements into and out of alternative provision; and new exclusions guidance arising out of the SEND Review.

4.13 The Brent SEND partnership are in step with the changes that are likely to result from the Green Paper. SEND is a priority group for the Brent ICP and priorities for action include those identified under paragraph 4.12 (a, b, c). The Council will be leading on the development of an Education Strategy for the borough which will include an Inclusion Plan that will capture the areas for development in paragraph 4.12 (d). These developments will require a change programme that will impact on resources, both funding through the General Fund and the High Needs Block of the DSG. Further developments may be required once the SEND White Paper is published, and/or as a consequence of future inspections.

5.0 High Needs Block (HNB) Current Position

5.1 The consequence of the 2014 reforms has been increasing pressure on resources, not only because of the a wide expansion of duties to ensure children and young people with SEND experience a full, varied and happy life with good educational and health outcomes, but also in the expansion of SEND duties to support young people with an EHCP up to the age of 25 (from 16).

- 5.2 The costs for children with EHCPs are funded from the High Needs Block (HNB) element of the DSG while the care element is funded from the Council's General Fund. The HNB carried forward a cumulative deficit of £15.1m from 2021/22. The 2022/23 Quarter 1 forecast position against the DSG is an in year deficit of £0.5m which brings the cumulative forecast deficit position to £15.6m.
- 5.3 Table 2 below shows the funding allocated to the HNB of the DSG increasing over the years. On average, the funding gap has been in the region of c£5m per annum and this has created a deficit year on year.

Table 2	HNB Funding £m	Recoupment £m	Total HNB Funding after recoupment £m	Year on year % Increases	HNB Overspend £m	Overall DSG Deficits £m
2022/23	75.0	(8.2)	66.8	13%	0.5	0.5
2021/22	66.4	(7.6)	58.8	10%	5.3	4.6
2020/21	60.4	(7.4)	53.0	7%	6.2	5.6
2019/20	56.3	(7.2)	49.1		3.8	4.9
Cumulative Deficit:						15.6

- 5.4 The funding gap has led to year on year deficits since 2019/20. Local Authorities with deficits are expected to have in place a Management Plan to mitigate the deficit over a number of years. Brent has a Deficit Management Plan in place, which has been agreed by the Schools Forum. The Management Plan is reported against three themes namely; Managing Demand; Improving Sufficiency of places and Financial Management. The plan is updated as part of the budget monitoring process and presented at 2 out of the 4 Schools Forum meetings each academic year.
- 5.5 The Local Authorities (Capital Finance and Accounting) (England) (Amendment) Regulations 2021, allows authorities to hold DSG deficits in a separate reserve in the authorities accounts but this accounting treatment is only allowed up to and including the accounts for 2022/23. Due to a number of authorities still holding large DSG deficits, further guidance is expected from the DfE regarding how DSG deficits should be treated after 2022/23.
- 5.6 The actions outlined in paragraphs 4.5 to 4.7 directly link to the managing demand and improving the sufficiency of local places. The increase in SEND places in borough will lead to a reduction in out-of-borough placements and placements in private special schools, delivering an estimated cost avoidance of c£5.9m by 2025.
- 5.7 With regards to financial management a lens has been placed on how funding from the HNB is used. A number of areas that should be funded through other means have been identified, such as medical needs provision, a reduction in additional top up funding and full cost recovery from other local authorities. A review of the health needs offer with the CCG, Public Health and the HNB is also planned. Working with the Integrated Care Partnership (ICP) plans are being developed to jointly commission provision to ensure a system wide approach to meeting needs. Growth funds in 2021/22 have been allocated to increase the Educational Psychology Services establishment and SEND teams enabling the service to both meet its statutory duties as well as provide the additional early intervention required to manage down demand. This will reduce the annual pressure on the DSG by £0.2m. In addition, contributions from the HNB towards the Looked After Children's Placement budget and Transport costs for SEND children have been rebased resulting in a reduction in reliance on HNB funding.

- 5.8 A 0.5% transfer from the Schools Block to the High Needs Block was approved by the Schools Forum to support the HNB in 2021/22 and in 2022/23. It is assumed that this request will continue in the future financial years.
- 5.9 Brent Council, as other local authorities, continues to lobby central government for funding increases, which properly match the levels of need via the Society of London Treasurers (SLT) and London Councils.
- 5.10 Table 3 below summarises the indicative cost avoidance of the actions identified in this report where quantifiable.

Table 3	2021/22	2022/23	2023/24	2024/25	2025/26
	£000	£000	£000	£000	£000
Managing Demand					
- Assumes slowdown in EHCPs	471	565	565	565	565
Improving Sufficiency of places					
- New secondary special school			576	1,152	1,200
- ARPs and Special school expansion	71	204	725	893	1,037
- Alternative Provision		110	110	110	110
- Post 16 skills resource centre				100	100
Financial Management					
- 0.5% Schools Block transfer	1,185	1,240	1,200	1,200	1,200
- Realign DSG funded SEN support services	270	2,217	2,467	2,467	2,467
- 5% Administrative charges	39	67	67	67	67
- Commissioning Arrangements	126				
Total Indicative cost avoidance	2,162	4,403	5,710	6,555	6,746

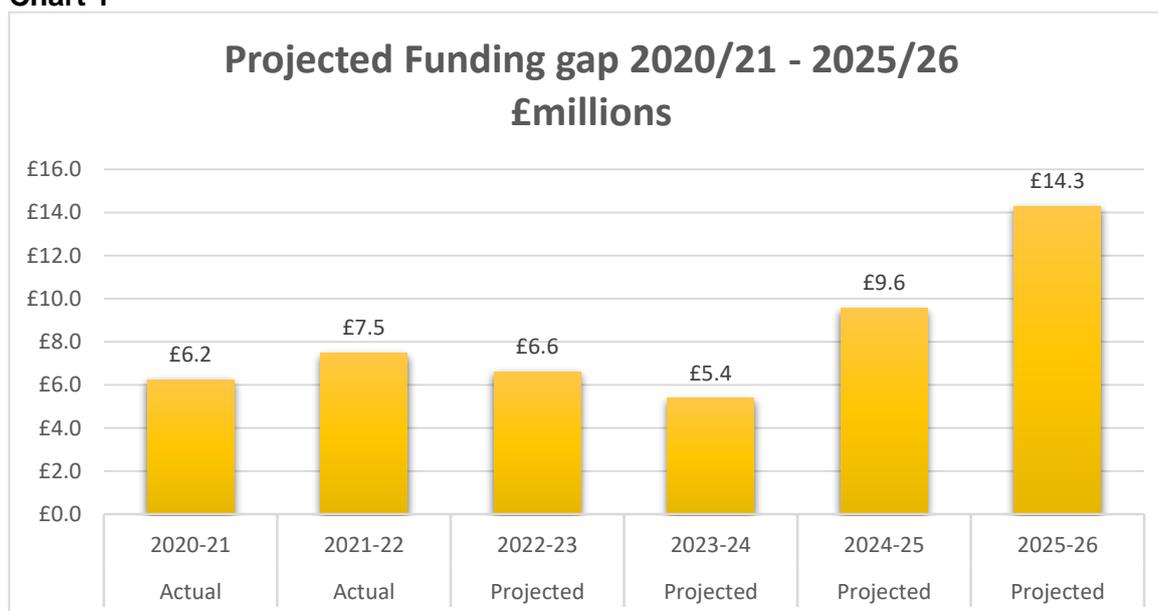
6.0 DFE Funding Update

- 6.1 In 2021/22, the majority of local authorities in London had forecast DSG deficits exceeding £300 million in total. Nationally the pressure exceeded £1 billion in 2020/21. In response to this, the DfE is running three programmes offering support to local authorities to tackle the pressures in the high needs system and for it to be placed on a sustainable footing. The programmes will support the direction of the Brent response to the SEND and AP Green Paper. These are:
- 6.1.1 **Safety Valve programme** – for authorities with very high deficits, there will be a £150m investment and the DfE plan to work with over 30 local authorities to achieve a financially stable system. Brent is *not* part of this programme.
- 6.1.2 **Delivering Better Value (DBV) in SEND programme** - to provide dedicated support and funding to help local authorities reform their high needs systems. Provision of £85m over 3 years from 2022/23 has been made to support 52 local authorities with less severe DSG deficits of which Brent is part of the first tranche of 20 local authorities and the process commenced in July 2022. Brent will receive support to reform the high needs systems with the aim of improving delivery of SEND services for children and young people while ensuring services are sustainable. The Management Plan will also be updated in line with outcomes of the programme.
- 6.1.3 **Education and Skills Funding Agency support programme** – Will support authorities at risk of going into deficits and will reach out to those authorities.

7 Financial Implications

- 7.1 The SEND review will bring about reforms to the funding system, a major part being the introduction of a new national framework of banding and price tariffs for high needs funding. Bandings would cluster specific types of education provision (aligned to need) as set out by national standards.
- 7.2 Brent like most local authorities uses a banding system to allocate funding ranging from on Bands 1 for lower levels of need to Band 6 for the most complex needs.
- 7.3 The introduction of Tariffs, which would set the rules, and prices that commissioners use to pay providers – for example, pricing attributed to specific elements of provision such as staffing, would ensure the right pricing structures are in place, and help to control high costs attributed to expensive provision. Currently providers charge for children placed out of borough and in Independent Non Maintained Schools based on their individual pricing structures, which are also subject to year on year inflationary increases, which could be above budgeted increases.
- 7.4 The proposed national framework of national funding bands has the potential to establish a more consistent basis for the funding of provision and all specialist providers will need to ensure the provision they offer is in line with the national SEND standards. It will be a complex task to achieve. However, the DfE will work with local authorities and provide clarity on the process and will propose pilot approaches on a smaller scale before carefully sequencing implementation on a national scale.
- 7.5 The current Brent Management Plan assumes, based on DfE guidelines, a rate of growth in HNB funding of 5% in 2023/24 and 3% in future years. Chart 1 below models the financial implications if expenditure continues to increase and the funding is not increased in line with the rate of growth. It shows that the annual funding gap could grow to c£14.3m by 2025/26.

Chart 1



- 7.6 The funding gap in the Chart 1 and in Table 4 assumes an average growth in expenditure of 10% as a result of the likely impact of inflationary increases due to the cost of living crisis and forecast demand increases. The table also reflects the impact

of the cost avoidance estimates from actions identified in the Management Plan to recover the deficit.

- 7.7 The working assumption is that the indicative cost avoidance ranges from £2.2m in 2021/22 to £6.7m by 2025/26 and due to planned reduction in the rate of growth for the HNB funding mentioned in paragraph 7.5 above, the deficit is likely to increase and by 2025/26, the cumulative deficit is projected to be c£27.6m.

Table 4	Actual 2020-21	Projected 2021-22	Projected 2022-23	Projected 2023-24	Projected 2024-25	Projected 2025-26
In year Forecast	£000	£000	£000	£000	£000	£000
Expenditure	67,346	73,858	81,410	83,908	90,448	97,620
HNB Allocation	(61,113)	(66,396)	(74,800)	(78,540)	(80,896)	(83,323)
Funding Gap	6,233	7,461	6,610	5,368	9,551	14,297
Forecast Cost Avoidance						
Managing Demand		(471)	(565)	(565)	(565)	(565)
Improving Sufficiency		(71)	(314)	(1,411)	(2,255)	(2,447)
Financial Management		(1,620)	(3,524)	(3,734)	(3,734)	(3,734)
Management Plan		(2,162)	(4,403)	(5,710)	(6,555)	(6,746)
Forecast in year Deficit/(Surplus)	6,233	5,299	2,207	(343)	2,997	7,551
Indicative Cumulative Deficit ALL DSG blocks	10,526	15,181	17,387	17,045	20,042	27,592

- 7.8 Additional duties arising from the reforms established through the Schools White Paper 'Opportunities for All' and the SEND review are yet to be announced. However, initial discussions with the DfE have indicated that other than the areas identified in paragraph 6.1 there is an expectation for local authorities to meet the new statutory duties within existing funding sources.

8.0 Legal/Equality Implications

- 8.1 The Department for Education (DfE) leads the SEND system for England and defines the legislative, policy and funding arrangements. The DfE's vision is of "children and young people with SEND achieving well in their early years, at school and in college; finding employment; leading happy and fulfilled lives; and having choice and control over their support." (DfE 2015b). The current arrangements for the education and care of children and young people with SEND are largely governed by the Children and Families Act (2014). Part 3 of this requires local authorities, schools and academies, early years providers and NHS bodies to pay regard to the regulations and to the statutory Code of Practice for SEND (DfE 2015a). Duties in the Children and Families Act (2014) include:

- To work across the local authority and health to jointly commission services that deliver integrated support for children and young people with SEND aged 0-25, including arrangements that support personalisation and personal budgets.
- For the local authority to work with local partners, parents and young people to co-produce and publish a Local Offer of SEND services and to assist young people in finding employment, obtaining accommodation and participating in society.

- For the local authority to provide co-ordinated education, health and care needs assessments for children and young people aged 0 - 25 and issue education, health and care (EHC) plans.
- For NHS clinical commissioning groups (CCGs) to put in place mechanisms to ensure practitioners and clinicians can support the integrated EHC needs assessment process.
- The Care Act (2014) sets out duties local authorities and CCGs must fulfil for children and young people with disabilities and their families, including direct payments and supporting transitions to adult care services. The Government holds the local SEND system to account through Ofsted and the Care Quality Commission (CQC) who have been tasked to carry out evaluations of local areas in England and their support for children and young people with SEND. Inspection teams assess the effectiveness of the local organisations in identifying and meeting the needs of all children and young people with SEND from ages 0 to 25 (Ofsted 2016).

9.0 Consultation with Ward Members and Stakeholders

9.1 The Lead Member for Children, Young People and Schools is regularly updated on SEND related matters as contained within this paper.

10.0 Human Resources/Property Implications (if appropriate)

10.1 Clarity on the duties arising from new legislation will indicate the impact on human resources.

Report sign off:

Nigel Chapman

Corporate Director of Children and
Young People