



Department
for Education

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8 January 2024

Feedback following the First Progress Review of Kent's Improvement Plan (APP)

Dear Sarah and Lee,

I am writing following our meeting on 15th November 2023 to review the progress against your Improvement Plan (APP).

Thank you to you and your teams for both the paperwork that was submitted prior to the meeting and for the contributions during the meeting. Particular thanks to the parent representatives, Bernie Hannon representing Kent PACT as well as all the school representatives. The local area's collective determination to making sustainable improvements to SEND services and to the lives of children and young people was clear. The evidence provided in advance alongside the additional information from partners during the meeting demonstrated a range of actions in place to accelerate improvement. We are aware that a significant part of the period we reviewed progress against has been an especially challenging period for many in senior leadership at Kent County Council due to the situation with unaccompanied asylum-seeking children.

Your Improvement Plan (APP) includes nine areas and our summary and feedback on the evidence you submitted is set out below.

Area 1: A widely held concern of parents that the local area is not able, or in some cases not willing, to meet their children's needs.

From the evidence submitted and the information shared at the review meeting, many of the actions within this area have been implemented. For example, events such as the Autism information event have taken place, there has been a redesign of letters that are sent to parents and carers and there are surgeries and workshops in place to support the strengthening of health input in EHCPs, including providing support for caseworkers.

For the next review meeting we will be particularly looking for evidence of:

- Parental confidence has improved across the wider group of parents and how this information will be gathered.
- Engagement with the wider group of parents on activity by the local area to drive improvements, including evidence such as surveys.

- The impact of the focus on SEN support in mainstream schools on parental confidence.
- The impact of the SEND enquiries hub on parental engagement and SEND complaints relating to communications from KCC.
- Co-production of the health offer for special schools.

Area 2: A variable quality of provision and commitment to inclusion in schools, and the lack of willingness of some schools to accommodate children and young people with SEND.

From the evidence submitted and the information shared at the review meeting, we note that many of the actions within this area are 'on track' to be completed. For example, training has been provided to a large proportion of schools, including a SENCO conference in March 2023. School-based decision-making panels have also allowed peer-challenge and problem solving.

For the next review meeting we will be particularly looking for evidence of:

- What plans have been put in place to improve the inclusion training offer to schools.
- The participation of schools that have not already engaged in the inclusion training offer.
- An analysis of the 15 February 2024 transfer data.
- The impact of progress made in reducing EHCNA requests as the core standards offer in schools becomes embedded and more widely understood and evidence of increased parental confidence in the SEN support offer in schools.
- A review of special school places, including resource provision.

Area 3: That parents and carers have a limited role in reviewing and designing services for children and young people with SEND.

From the evidence submitted and the information shared at the review meeting, we note the work around co-production that has been carried out with the Council for Disabled Children and that Kent PACT have been involved in reviewing and developing services. The reference to parental involvement in resolving a recent transport issue was a good example of parental influence on improving services.

For the next review meeting we will be particularly looking for evidence of:

- Children and young people's perception of their involvement in strategic decisions.
- Parental perception of their role in reviewing and designing services.
- The impact of the audit tool on gathering and acting on parental views
- The impact of implementing the training and support being offered via the Council for Disabled Children.

Area 4: An inability of current joint commissioning arrangement to address known gaps and eliminate longstanding weaknesses in the services for children and young people with SEND.

From the evidence submitted and the information shared at the review meeting, we note that good progress has been made in the strategic approach to joint commissioning, with emphasis on the data available across organisations to support decision-making. Evidence was provided which demonstrated monthly funding panels, deep dives conducted a strengthened governance approach and shared leadership across partner organisations.

For the next review meeting we will particularly be looking for evidence of:

- The direct impact these shared decisions have had on the lives of children and young people with SEND and their families.
- Evidence of how the newly established sit-reps have led to changes in joint commissioning that have positively influenced children and their families.

Area 5: Poor standards achieved, and progress made, by too many children and young people with SEND.

From the evidence submitted and the information shared at the review meeting, we note that many of the actions within this area have been implemented with some impact made. Good examples of improvement were shared such as the establishment of stronger relationships with a wider group of schools, establishing the role of the inclusion champions and the interaction with the post-16 sector. School leaders who we heard from were generally positive about the interactions they have with the local authority and the level of support that is provided. There were examples of training that has been provided to schools as previously mentioned under area 2, including others such as training for governors and the Inclusion Leadership Programme. The attainment gap for SEN support is slightly above the national average, which is an early indicator of improvement.

For the next review meeting we will particularly be looking for evidence of:

- The impact of the School Inclusion Champions.
- The impact of the work with schools and PRUs to improve attendance.
- How educational settings are using the CATIE data to improve the outcomes for children and young people.
- A focus on the outcomes for the post 16 young people with SEND, as the wider offer for post 16 provision is established.

Area 6: The inconsistent quality of the EHC process; a lack of up-to-date assessments and limited contributions from health and care professionals; and poor processes to check and review the quality of EHC plans.

From the evidence submitted and the information shared at the review meeting we note that there is better oversight of the statutory process and that an increase in the capacity has resulted in some improvement in timeliness. More robust quality assurance processes and feedback is beginning to have an impact, and there was assurance that this will continue to be an area of focus.

For the next review meeting we will be looking for evidence of:

- The impact of actions evidenced through improved EHCP timeliness data, particularly beyond 30 and 52 weeks.
- Parent/carers, and children and young people's views on the assessment process.
- A robust quality assurance process being in place, and how this has impacted the work of the assessment and casework teams.
- The impact of the attendance of health professionals at annual review meetings.
- An improvement in parental engagement throughout the EHCP assessment process through the qualitative and quantitative data.
- Assurance that the sample size of the audits are representative of all EHCPs.
- Evidence of an improvement in the quality of EHCPs.

Area 7: Weak governance of SEND arrangements across the EHC system at strategic and operational level and an absence of robust action plans to address known weaknesses.

From the evidence submitted and the information shared at the review meeting, we note that there is increasing evidence of much stronger governance and strategic oversight in place. There is evidence of work that has been co-produced with schools and Kent PACT. There is clear partnership representation at SIAB, PDG and the task and finish groups. There are communication channels in place with parents and carers and young people such as the use of newsletters to share information. There is a risk management strategy in place, and all SEND governance arrangements and terms of reference have been updated.

For the next review meeting we will particularly be looking for evidence of:

- The agreed area-wide ambition for children and young people with SEND is consistently seen across the partnership.
- An updated EHCP action plan that clearly shows sustained improvements in 3-month increments demonstrating that the 20-week timeliness is improving as well as the reduction in the number of assessments beyond 30 and 52 weeks.

Area 8: Unacceptable waiting times for children and young people to be seen by some health services, particularly CAMHS, tier two services, SALT, the wheelchair service and ASD and ADHD assessment and review.

From the evidence submitted and the information shared we note that significant progress has been made in the strategic direction of services to improve the waiting times for children to access specialist health input, including to the neurodevelopmental assessment and SALT services.

A reduction in waiting time for SALT support under the balance system was positively recognised. We are aware that there are minimal data points to suggest sustained reduction, however the positive direction of travel is acknowledged.

It was noted that there have been delays in implementing the necessary changes to the neurodevelopmental assessment pathway, however the system identified remedial actions they had taken to improve the support families were receiving while they were waiting. We heard of the positive approach taken to ensure a consistent methodology was being taken across multiple providers to ensure a single risk algorithm was in place, alongside the waiting list validation exercise.

We note reported recovery and sustained performance in the specialist medical equipment service, ensuring more children are being seen quickly.

For the next review meeting we will particularly be looking for evidence of:

- How feedback from children and young people and their families is being consistently used to influence service design and delivery.
- The impact the significant changes of the community service's re-procurement exercise and neurodevelopmental assessment programme is beginning to have on families waiting.

Area 9: A lack of effective systems to review and improve outcomes for those children and young people whose progress to date has been limited by weaknesses in provision.

From the evidence submitted and the information shared at the review meeting we note that progress has been made in this area, however there is a lack of impact to evidence this progress. There is evidence of internal tuition provision delivery, although the attendance of children and young people with SEND is low. There is also evidence of co-production of SALT services.

For the next review meeting we will particularly be looking for evidence of:

- The qualitative and quantitative data such as attendance, exclusions and academic achievements
- The review of the Children and Young People's outcome framework as part of the SEND strategy.

Overall, it is evident that progress has been made by the local area across all nine areas in the Improvement Plan (APP), and that there are strong governance arrangements and a strategic oversight in place. The statutory compliance of Kent County Council's SEND services is on a positive trajectory and it is imperative that the pace of this improvement is maintained.

However, as you are aware, there is still significant progress to be made, particularly in demonstrating the impact of actions on the lives of children and young people with SEND and their families. Work stream leads need to ensure that all actions in the Improvement Plan (APP) within each area of weakness are being addressed and the impact of these actions is evidenced at the next progress review meeting. There needs to be a sustained effort to ensure that the voices of children and young people with SEND and the wider groups of parents is captured and acted on both on an individual and at a strategic level.

One specific requirement in the Improvement Notice issued on 31st March 2023 was that Kent County Council would, "provide a clear plan to ensure that it has in place, within six months from the date that the Improvement Notice is published, a permanent, suitably trained, SEND case work team of sufficient capacity to enable the effective delivery of the Education, Health and Care ("EHC") needs assessment and review system including effective partnership working systems with advice writers to help improve both the timeliness and quality of the EHC plans." I can confirm that we are satisfied that Kent County Council has met this commitment.

The Improvement Notice also states that the Council should aim for the majority of the actions included in the Improvement Plan to be delivered by the end of April 2024 (i.e. within 18 months of the Ofsted and CQC revisit) or sooner, where appropriate. The Department and NHSE will therefore undertake a further review of progress against the Improvement Plan (APP) in April 2024. Although we have highlighted specific areas of focus above, we will require an update on all actions in the Improvement Plan (APP) for this review. In the meantime, please do draw upon the support that is available to you from both DfE (Jasmine Hussain and Liz Flaherty) and NHS England (David Keaveney-Sheath).

I am copying this letter to Amanda Beer, Paul Bentley, Cllr Roger Gough, Cllr Rory Love OBE, Christine McInnes, Abigail Kitt as well as Liz Flaherty (SEND Adviser), Adanna Williams and David Keaveney-Sheath (NHSE).

Yours sincerely,



Sarah Dimond-Smith
Head of Vulnerable Children's Unit,

South East Regions Group.