



Sutton Local Area Written Statement of Action 3 July 2018



1. INTRODUCTION

- 1.1. Between 22 January 2018 and 26 January 2018, the local area of Sutton was inspected by Ofsted (Office for Standards in Education, Children's Services and Skills) and CQC (Care Quality Commission). The inspection was to see how well the area had put in place the changes across all services that the Children and Families Act 2014 requires for children and young people with special educational needs and disabilities (SEND) and their families.
- 1.2. Whilst the Chief Inspector identified a number of strengths in the local area, there were also three areas of significant weakness identified in Sutton. These were set out in a letter which was published on the [Ofsted website](#) on 23 March 2018. To show how the Local Authority (LA) and the area's Clinical Commissioning Group (CCG) is going to address these areas of weakness, we have developed this Written Statement of Action.
- 1.3. For each of the areas of weakness, we have made the following commitments:

Area of Weakness identified by Ofsted and CQC	Sutton Local Area Commitment
<p>1. A lack of coherence and joint working between local area leaders, agencies and schools, which is resulting in poor communication, inconsistent opportunities for social inclusion and a high number of exclusions, especially at primary school level</p>	<ul style="list-style-type: none"> ● We will clarify roles, responsibilities and communication processes to provide a joined-up and collaborative approach for children and young people with SEND and their families ● We will improve the consistency of opportunities for social inclusion and reduce the number of exclusions, particularly in the primary sector

	<ul style="list-style-type: none"> • We will improve opportunities for education settings, health and social care services to be jointly involved in decision making around SEND • We will improve opportunities for effective joint working practices
2. Poor oversight of quality and impact of Education Health and Care (EHC) Plans in meeting the needs of children and young people	<ul style="list-style-type: none"> • We will improve the efficiency of the EHC Needs Assessment process and the effectiveness of the Annual Review process • We will improve the quality of outcomes in our EHC Plans through an overall Quality Assurance Framework of SEND processes
3. Inequality of opportunity for families, which has arisen from a serious decline in the availability of an effective independent advice service in Sutton.	<ul style="list-style-type: none"> • We will improve our Sutton Information Advice and Support Service • We will improve our Local Offer and redesign our Local Offer Website

- 1.4. As local leaders we are committed to making improvements for children and young people with SEND and their families. We want to make sure that children are living, learning and growing up well in Sutton. Our driving ambition is to ensure children and young people's needs are met earlier so that their outcomes are better, realised sooner, and so that wherever possible they won't need the help of statutory services later down the line. To make this happen, we need to understand what stops this happening now, agree what 'good' looks like, and then decide how we will improve what we do consistently across the area.
- 1.5. As local leaders we are disappointed that we have not progressed as quickly and effectively as we should but we **accept and acknowledge positively the findings of** OFSTED and CQC: they provide a clear driver and mandate for change for the LA, the CCG and the local area.
- 1.6. The outcomes of the inspection have helped us to understand that:
- Despite recent improvements and an increased focus on change, there has not been enough progress over time in making the changes that the Children and Families Act 2014 requires

- Training and support to leaders, officers and professionals across agencies in the Local Area, to help them understand and implement the changes, has not been sustained for long enough.
- There has been staff turnover at all levels which has meant that the impact of the training and support that has been given has not lasted. There has been an absence of ‘collective wisdom’ in place to drive forward the desired change at both strategic and operational levels.
- The setting up of a Local Authority Trading Company (Cognus Ltd) in November 2016, was a necessary response to the heavy financial pressures on education services in the Borough. However, this has impacted on our progress in the following ways:
 - At a time of limited leadership capacity, it has taken time and attention away from developing and embedding the SEND reforms
 - Lines of communication and accountability appeared to schools and families to be less clear, leading to schools in particular feeling less supported and less able to manage SEND pressures effectively
 - Significant changes in staffing for some key service areas hindered the scope of leaders to maintain what were previously areas of strength, particularly:
 - The Sutton Information Advice and Support Service
 - The Local Offer
 - As a local area, we need to clarify the roles and responsibilities of different agencies and to strengthen the governance of the requirements of the Children and Families Act 2014.

1.7. We have taken the necessary time to reflect on the issues identified above and have started to take action to improve following the Ofsted and CQC findings. However, it is important that underpinning these actions is an agreed and collective vision for how we want to move forward across the local area.

2. OUR VISION

2.1. Coming together as a local area through our SEND Implementation Group, we have reviewed the work undertaken on our SEND strategy and reconfirmed our collective Vision:

“We are collectively ambitious for our children and young people. Together we want to provide them with the best chances to achieve the best outcomes in life whatever their starting point, and prepare them effectively for adulthood.”

2.2. The local area will be driven by this Vision for children and young people and has used this to guide the creation of the Written Statement of Action. This is a development of the Vision set out in our Draft SEND Strategy which was endorsed by elected members in January 2018, just prior to the SEND Area Inspection. Some initial actions have been completed as part of this strategy, but further work is now required to develop the strategy and align it with the work set out in this Written Statement of Action: both are critical in achieving our vision. In collaboration with key partners including the CCG, education settings across all phases, the Local Authority, young people, parents/carers and the voluntary sector, we intend to have reviewed and expanded the SEND strategy by April 2019 in line with the work required by the Written Statement of Action.

3. KEY OBJECTIVES

3.1. In order to achieve our vision, partners have identified seven overarching objectives, and priorities to achieve them, in order to drive improvement. Some of these objectives go beyond the written statement of action and will underpin our intentions to improve our SEND offer across the local area. At the heart of this is a determination to change culture and practice, to listen to children and young people with SEND and their families, and to ensure that they are able to participate as fully as possible. Local leaders understand the urgent need to make a difference to families, children and young people. We recognise that continuing to develop, equip and enable professionals to work more effectively with families and young people, in line with the requirements of the Children and Families Act 2014, is key to improvement.

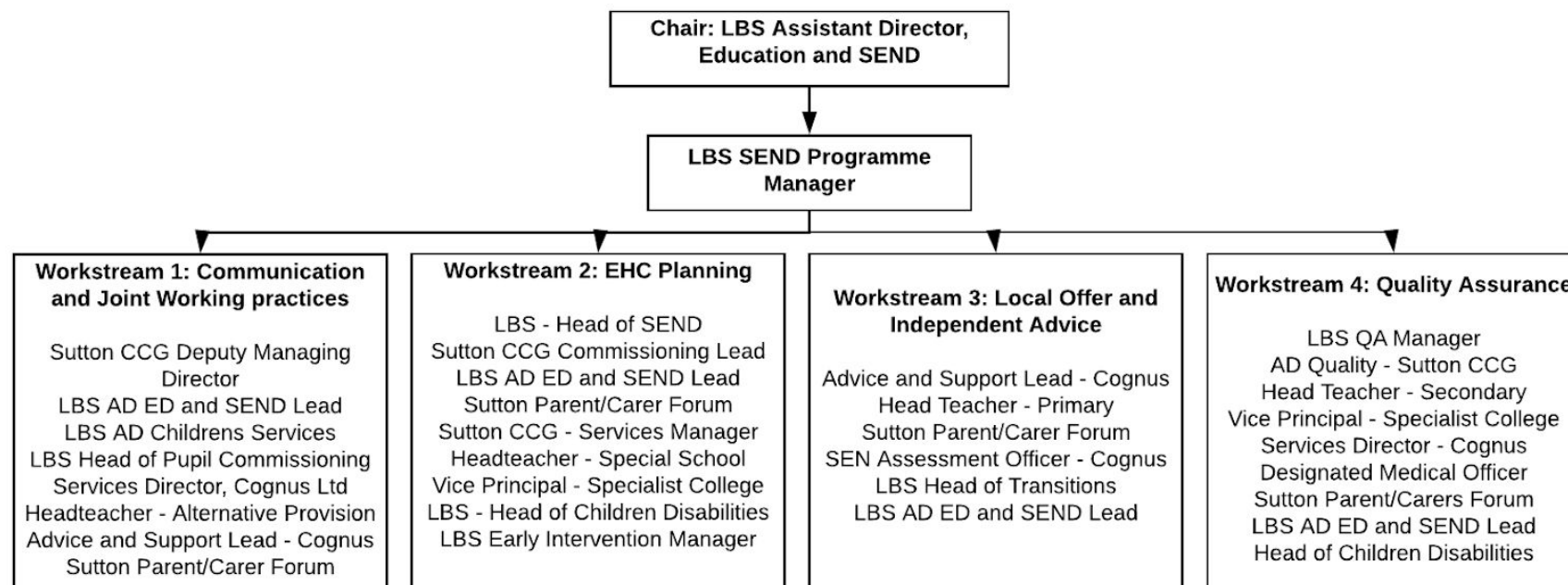
<i>In Sutton, we are collectively ambitious for our children and young people. Together we want to provide them with the best chances to achieve the best outcomes in life whatever their starting point, and prepare them effectively for adulthood.</i>	
KEY OBJECTIVES	KEY PRIORITIES
Objective 1 - Co-production and Effective Communication: parents/carers, families, young people, education settings, health, social care, private, voluntary and independent sector and local authority and Cognus services collaborating to resolve issues, meet needs and create a pathway to adulthood	<ul style="list-style-type: none"> ● Develop clear and coherent pathways to and through services, and communicate these effectively to the community ● Create a continuum of inclusion to meet needs effectively at the earliest point
Objective 2 -Working to meet needs at the earliest point and reducing the likelihood of further intervention at a later point	<ul style="list-style-type: none"> ● Support families and young people, through outcomes

Objective 3 - Keeping aspirations high for all our children and young people and improving outcomes	based commissioning, so that they are able to make informed choices
Objective 4 - Listening to the voice of children and young people and parents/carers	<ul style="list-style-type: none"> ● Work with schools and educational settings to ensure effective use of reasonable adjustments, best endeavours and the 'assess, plan, do, review' approach
Objective 5 - Wherever possible, ensuring children, young people and young adults are supported and sustained in local settings , and within their local community	<ul style="list-style-type: none"> ● Strengthen our understanding and use of relevant legislation including the Children and Families Act 2014, the SEND Code of Practice 2015, The Equality Act 2010 and The Care Act 2014 throughout all services and settings, to inform our practice and to promote access and opportunity
Objective 6 - Supporting Sutton education settings and schools to meet the needs of all their children and young people, and ensuring that these settings consistently provide good value for money .	<ul style="list-style-type: none"> ● Enhance and shape our views on the power of diversity, equality and social inclusion
Objective 7 - Creating a more inclusive, positive and celebratory model of disability and difference	

4. OUR WRITTEN STATEMENT OF ACTION

- 4.1. Our Written Statement of Action sets out how the local area will address the three key weaknesses raised in the inspection and sustain improvement for children and families at scale and pace. It defines roles and responsibilities and shows clear lines of accountability. The Statement was developed through a strong partnership with senior leaders across the area, through a multi-agency, multi-professional approach, committing resources and leadership direction. These include education settings, the voluntary and community sector, family and young people representatives and statutory services. Collectively this group has formed the 'SEND Implementation Group' as set out in the diagram below. There are four workstreams linked to the main areas of weakness identified by Ofsted together with an additional workstream on Quality Assurance which underpins much of the work required in the Written Statement of Action.

5. SEND IMPLEMENTATION GROUP



6. ACTIONS UNDERTAKEN SINCE THE INSPECTION LETTER WAS PUBLISHED ON 23 MARCH 2018

- 6.1. For each of the areas of weakness, we have already completed a range of actions. These are outlined below.
- 6.2. **Area 1:** 'A lack of coherence and joint working between local area leaders, agencies and schools, which is resulting in poor communication, inconsistent opportunities for social inclusion and a high number of exclusions, especially at primary school level'

Leadership

- In response to concerns about leadership capacity

- the **Local Authority** appointed a permanent **Assistant Director for Education and SEND** to drive through the LA's SEND Change Programme and to provide a single strategic lead within the Local Authority.
- the **CCG** appointed a substantive **Deputy Managing Director** with the responsibility for leading health engagement and participation in delivering the SEND Change Programme.
- the **Local Authority** recruited a **SEND Programme Manager**, who has significant experience of change management in SEND to support the Implementation Group and to ensure focus and rigour in the SEND improvement programme including the Written Statement of Action
- In order to strengthen governance and improve communications, the Local Area set up an Implementation Group and developed **three multi-agency workstreams** to address each area of weakness identified by Ofsted and ensure joined up working across the partnership to achieve the shared Vision; and
- Developed a **fourth workstream** to address overarching issues, specifically those of **Quality Assurance and Performance Management** to ensure we develop, consolidate and maintain consistently high standards
- We initiated a **review of the Designated Medical Officer role** and how to make this effective in line with the requirements of the Children and Families Act 2014, in order for the Local Area partnership to have a strong common understanding and better informed decision making

Joint Working - we have

- Established a **Vision** for the Local Area with regards to SEND providing a shared common aim for all partners that will provide the basis for decision making
- Established **joint governance** of the Written Statement of Action with Local Authority and CCG strategic leaders, ensuring robust leadership at a senior level within the area
- Commenced delivery of the planned **integrated identification and early support service** for children with Social Communication needs potentially linked to Autism, improving access to earlier support for children and young people. This support will improve the appropriateness of requests for Education Health and Care Needs Assessments (EHCNAs) as well as the evidence that supports them. It should also reduce the likelihood of a request as the needs can be met appropriately in other ways

6.3. **Area 2: 'Poor oversight of quality and impact of EHC Plans in meeting the needs of children and young people'**

Education, Health and Care Plans (EHC Plans) - we have

- **Completed the conversions** of all statements to EHC Plans within timescale

- Implemented the plan to increase leadership capacity, drive change and improve quality for families and stakeholders through the recruitment of a **dedicated Team Manager within the SEND team.**
- Developed and introduced a **new draft EHC Plan Quality Assurance template** co-produced with Sutton Parents Forum and education leaders using the Department for Education guidance to promote better quality EHC plans. SEND case officers now cross moderate colleagues' draft EHC plans before issue; further developments will be considered and agreed in the Autumn term
- Increased the **frequency and quality of liaison** between professionals assessing need, families and SEND case officers in order to more effectively co-produce an outcomes-focussed and person-centred EHC Plan
- Put in place a robust plan for **case officers to contact and interact** with parents/carers and families throughout the assessment process, this will lead to increased co-production and a more person-centred Plan.
- Ensured that Case Officers **contact parents/carers, young people and education settings at the end of each EHC Needs Assessment to secure feedback** on the quality of communication and interaction that they have experienced from the SEND service. Feedback provided will shape the way in which we improve the development of SMART outcomes, how we interact with parents and carers and young people about the process and the decisions, and help us to develop a more person-centred service
- Completed an initial review of the **training needs** for those contributing to EHC Needs Assessments
- Reviewed and **invested c£500k into a community paediatric service** to secure delivery of a statutorily compliant service with the capacity to provide a sufficient level of clinical scrutiny to the education, health and care planning process
- The CCG has agreed with its community provider for 2018/19 that **improving the input into the SEND process by health therapy services** is a Commissioning for Quality and Innovation Standards (CQUINS) requirement, leading to more comprehensive and outcome focussed Plans.

6.4. **Area 3: 'Inequality of opportunity for families, which has arisen from a serious decline in the availability of an effective independent advice service in Sutton.'**

We have -

- **Increased the SIASS staffing** to 1.4 full time equivalent (fte) and **in partnership with the Parent Carer forum** we have already appointed 0.6 FTE
- Initiated a transformational **Business Plan for SIASS** to align with quality standards to provide a more effective service to families

7. ACTIONS TO BE TAKEN TO ADDRESS THE KEY AREAS FOR DEVELOPMENT FROM THE INSPECTION:

- 7.1. Whilst we have made good progress on some actions there is a lot of work still to do. The following section sets out the detailed actions we wish to undertake to address the three areas of significant weakness identified in the Inspection letter. All these actions will be delivered taking into account the Sutton Plan's vision (*Quality of Life and Opportunities for All*) and considering an Outcome Based Commissioning approach, with a focus on ***making informed choices*** and ***living well independently***.

Lead Abbreviations:

AD E&SEND:	London Borough of Sutton Assistant Director Education and SEND
LC CCG:	Lead Commissioner Clinical Commissioning Group
LC LBS:	Lead Commissioner London Borough of Sutton
DMD CCG:	Sutton's Clinical Commissioning Group Deputy Managing Director
AD CSC:	London Borough of Sutton Assistant Director of Children Social Care
AD ASC:	London Borough of Sutton Assistant Director Adult Services
HoSEND:	London Borough of Sutton Head of SEND Service
SEND PM:	SEND Programme Manager
CSD:	Cognus' Services Director
HoPBC:	London Borough of Sutton Head of Pupil Based Commissioning
PQA Manager:	London Borough of Sutton Participation and QA Manager
ADQN:	Sutton's Clinical Commissioning Group Assistant Director of Quality and Nursing
CLD:	London Borough of Sutton's Children Services Learning and Development
HoSAS:	Cognus Head of Service Advice and Support

1.	<i>“Lack of coherence and joint working between local area leaders, agencies and schools, which is resulting in poor communication, inconsistent opportunities for social inclusion and a high number of exclusions, especially at primary school level”</i>			
	Action to be Taken	Lead(s)	Timescales / key dates	Success Criteria/Evaluation Framework
Ensure clarity of roles and responsibilities and communications processes to provide a joined-up and collaborative approach for children and young people with SEND and their families				
1.1	Reinforce our Vision and co-produce an agreed way of working to ensure the spirit and the letter of the Children and Families Act 2014 is embedded in the local area’s work	AD E& SEND	Initial Meetings: Joint SENCO Meeting: 26 June 2018 Primary and Secondary Heads’ Forum: 5 July 2018 SEND Workshops; Commencing September 2018 -	<ul style="list-style-type: none"> ● Stakeholders (as represented in the Implementation Group) understand the Vision and ensure their practice is in line with this and the Children and Families Act. ● Parents/carers and young people, have an increased confidence in the LA and CCG’s understanding and execution of the Children and Families Act 2014 <p>This will be measured through</p> <ul style="list-style-type: none"> ● A compulsory bi-annual questionnaire to members of the SEND Implementation Group. ● Responses received through the regular Sutton Parent Carers Forum questionnaire which will report into the SEND Implementation Group. <p>The first survey / questionnaire will be undertaken in the Autumn 2018 to baseline. 70% of all professionals surveyed by Autumn 2019 will be able to demonstrate knowledge and understanding of the Vision, the key tenets of the Children and Families Act and how this relates to their work.</p>

1.2	Review joint commissioning arrangements and establish a Joint Commissioning Strategy across the partnership. This will be in line with Sutton's Outcome Based Commissioning principles.	LC CCG; LC LBS	The Local Area has a clear Joint Commissioning Strategy for 2019 to 2020 by December 2018	The Joint Commissioning Strategy and relevant activities co-produced and agreed by relevant services
1.3	CCG to review and improve the effectiveness of the DMO role to ensure compliance with the Children and Families Act 2014	DMD CCG	By September 2018 the Local Area will have an effective DMO that will develop, contribute to and consolidate the compliance of Health colleagues with the CFA 2014 and the SEND Code of Practice 2015.	<p>This will be demonstrated through</p> <ul style="list-style-type: none"> • 100% compliance with timescales for provision of advice (with permitted exemptions) by December 2018 • The inclusion of relevant, accessible information and person-centred outcomes in all professional advice by April 2019 • Feedback on the health advice from young people and families following each EHCNA process <p>It will also be measured through</p> <ul style="list-style-type: none"> • a survey of health professionals to review their understanding of the purpose and their practice in contributing to an EHC Needs Assessment.
1.4	Devise, develop and enact joint working protocols between Education, Health and Care.	AD E& SEND; AD CSC; AD ASC; DMD CCG	By November 2018 joint working protocols will be in place.	<p>Professionals will demonstrate</p> <ul style="list-style-type: none"> • A more accurate understanding of their single and joint responsibilities and duties regarding SEND through the quality of their contributions to preventative work; to EHC Needs Assessments; and to the accessibility and inclusivity of the Local Offer. <p>This will be measured by</p>

				<ul style="list-style-type: none"> • A reduction in EHC Needs Assessment requests (ie because of the effectiveness of prior involvement of professionals) by April 2019 • The timeliness of person-centred advice for an EHC Needs Assessment by April 2019 • The accuracy and relevance of information on the Local Offer by December 2018.
1.5	<p>Co-design with parents and agree the processes for</p> <ul style="list-style-type: none"> • Involving families in SEND processes and assessment practices • Gathering parents/carers and young people's feedback on a range of SEND-related areas 	HoSEND; HoSAS; Sutton Parent Forum	By September 2018 the Local Area will have agreed with the SPF how parents will be involved in SEND processes / assessment practices.	<p>This will be demonstrated by</p> <ul style="list-style-type: none"> • Feedback from families and young people demonstrates an increase in satisfaction regarding their involvement in assessments by April 2019
1.6	<p>Develop an improvement plan for communicating SEND activity and the local offer. This plan will:</p> <ul style="list-style-type: none"> • improve consistency between partners (LA, CCG, schools etc) in how they engage with local families, children and young people, ensuring that for local people information is provided in a simple to access and appropriate format, relevant to them • increase the frequency of routine communications to both local people and partners who are interested in SEND information • increase the accuracy of information - making sure that an agreed 	Local Authority and CCG Communication Leads with the Lead Local Offer Officer (see 3.7)	<p>Development of Task and Finish group in Sept 2018</p> <p>Creation and execution of a jointly-owned Communications Strategy by March 2019</p>	<p>This will be demonstrated by</p> <ul style="list-style-type: none"> • A consistent approach to communication between stakeholders by December 2018 • Processes to ensure accurate and up to date information on the Local Offer website established by December 2018 • Greater satisfaction from parents/carers and young people regarding their knowledge and understanding of developments in the local offer for SEND as assessed through a questionnaire or feedback to the Local Offer website, by April 2019 • A timely response to feedback and resolution of issues by December 2019 <p>This will be measured through</p>

	<p>process exists to ensure the local offer website is kept up to date</p> <ul style="list-style-type: none"> • develop a process for actively seeking feedback both from individuals and from local stakeholder groups - sharing the findings • increase engagement with local people face to face, by making the most of local events • develop a process - and set standards - to improve responses to SEND enquiries from local people, for example improving response times and improving the quality of responses 			<ul style="list-style-type: none"> • Feedback from the Sutton Parent Carer Forum and the Local Offer Website (see Sect 3 below)
Improve the consistency of opportunities for social inclusion and reduce the number of exclusions				
1.7	<p>Support education settings to address needs more effectively and earlier through:</p> <ul style="list-style-type: none"> • Supporting access to high quality advice and support about how to include and retain students with SEND • Enabling more mainstream settings to use outreach support for children with SEND, particularly SEMH and ASD, at an earlier stage, eg through using the Integrated Identification and Early Support Service for children with social communication difficulties and using the strengths and skills in our specialist settings 	<p>LC CCG; AD E& SEND; AD CSC</p>	<p>By April 2019, the Local Area will have developed a range of support and outreach mechanisms to support inclusion.</p>	<p>This will be measured by:</p> <ul style="list-style-type: none"> • The percentage of children with SEND who are fixed-term excluded will reduce to equal to or below the national average (from current 26% to 19% by 2019 and 12.5% by September 2020) • The number of children with EHC Plans educated in mainstream settings will increase to equal to or above the national average (from current 33% to 45%) by September 2021

	<p>and Alternative Provision for outreach</p> <ul style="list-style-type: none"> • LA/Cognus attendance and brokering of interim Annual Reviews and TAC meetings designed to promote multi agency support and keep students in an effective continuum of provision • Revisiting the terms of reference and promoting best inclusive practice at Vulnerable Pupil Panels • Working holistically with families to address issues both at home and in education settings 			
Improve opportunities for education settings, health and social care to be jointly involved in SEND decision making practices				
1.8	<p>Review terms of reference and practice of SEND Panel meetings to ensure an informed, effective and holistic decision-making process through:</p> <ul style="list-style-type: none"> • Ensuring mainstream and special education settings, social care and health representatives and other agencies attend consistently and advise the LA effectively from their professional perspective. • Supporting panel attendees to feedback improvement suggestions regarding assessment or advice from their professional domain • Increasing the attendance and contribution of the DMO to strengthen CCG input to the decision making process 	AD E& SEND	A review of the SEND panel processes will be complete by September 2018	<p>This will be demonstrated by:</p> <ul style="list-style-type: none"> • Decision making is appropriately supported through a multi-agency approach by October 2018 • Outcomes for children and young people with SEND are holistic and person-centred by April 2019 • There is a reduction in the requests for appeals to SENDIST because the decision-making is more clearly evidenced and parents/carers are therefore more confident in the decision-making process (ie that the needs of their child have been fully considered) by April 2019 • There is a reduction in appeals upheld by April 2019

	<ul style="list-style-type: none"> Clarifying the decision-making relationship between the SEND Panel and Joint Placement Panel in order to minimise delays for children and young people to access necessary provision. 			
1.9	<p>Establish the processes and offers to ensure that Year 5, Year 9 and Year 11 learners are supported to remain in, or transition back to, local settings where appropriate in Y6, Y11 and Y12 through:</p> <ul style="list-style-type: none"> Discussion and exploration of local provision with parent/carers (eg open days) Autumn term Panel meetings, including London Borough of Sutton (LBS) special provision and mainstream headteachers / SENCOs, Health and Social Care representatives to review out-borough or independent / non-maintained placements and Identify provision and packages to meet needs locally on transition Opportunities to commission differently / locally taken up 	AD E& SEND; AD CSC; DMD CCG; HoSEND	Regular transition panel meetings in place by September 2018	<p>The annual review process at transition points is more rigorous and effective as demonstrated by:</p> <ul style="list-style-type: none"> More children and young people being educated locally by September 2020 There is more effective joint work between agencies to support families holistically by January 2019 Local settings work with families more effectively to meet needs and achieve outcomes by April 2019 An increase in the feedback from young people and families regarding transition points recording 'satisfied' or above by September 2019
Improve opportunities for effective joint working practices				
1.10	<p>Review the Joint Placement Panel and other forums for joint decision-making</p> <ul style="list-style-type: none"> Agree function and purpose 	LC CCG; AD E&SEND;	Review to be complete by October 2018	<p>This will be demonstrated by:</p> <ul style="list-style-type: none"> Decision making is appropriately advised through a multi-agency approach by November 2018

<ul style="list-style-type: none"> • Develop accurate TOR and membership • Agree criteria for bringing cases • Define decision making powers • Develop effective governance of decision making 	AD CSC		<ul style="list-style-type: none"> • Resource sharing between Health, Social Care and Education in consistent, fair and transparent by April 2019
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2. "Poor oversight of quality and impact of EHC Plans in meeting the needs of children and young people"				
	Action to be Taken	Lead(s)	Timescales/key dates	Success Criteria/Evaluation Framework
EHC Needs Assessment, EHC Plans, Annual Reviews and Monitoring of Outcomes Process Improvements				
2.1	Complete a review of customer journey and EHC Needs Assessment processes to identify difficulties and good practice and inform the development of <ul style="list-style-type: none"> • A clear, appropriate and easily-completed request for assessment documentation; • A streamlined and clear 20 week EHC Needs Assessment process; • Information available in family-friendly versions on the Local Offer website; • Clear letters that are easily understood whilst remaining lawfully compliant; • Alignment and links with Early Help Assessments where appropriate 	HoSEN; SEND PM; AD CSC	Review by September 2018 - process/ documentation in place by December 2018	Measured by <ul style="list-style-type: none"> • An increase in the number of Plans being issued within the required timescales each term until 80% meet the required timescale by April 2019 and where they are not meeting the timescale, this is for an appropriate, evidenced reason. • An increase per term in the number of families returning a positive "end of process" survey regarding the service by September 2019 • Of those returning an "end of process" survey, an increase in the number recording 'satisfied' or above by September 2019
2.2	Improve the quality of EHC Plans through:	HoSEND	Revised quality assurance processes	This will be measured by

	<ul style="list-style-type: none"> • Developing a suite of EHC Needs Assessment Request forms, Advice forms, EHC Plans templates and Annual Review forms that are congruent and user-friendly, whilst remaining lawfully compliant, through a task and finish group comprising LA, CCG, education settings and parent./carer/young people representatives. This will include comparing such documents from other boroughs and learning from best practice • Ensuring all Plan writers understand the essential components of an effective EHC Plans • Establishing a rigorous Working Document / Draft Plan review process using a co-produced quality assurance template based on legal compliance and qualitative KPIs • Feeding back development issues to case officers through 1:1 supervisions with team manager/appraisals and monthly team meetings in order to improve the quality of EHC Plans. • Developing a twice termly Senior Management Scrutiny Group to review a sample of 10 cases; This Group will include representation 		<p>will be operational by January 2019</p>	<ul style="list-style-type: none"> • An increase in the number of clearly written, jargon-free, person-centred and outcome focused EHC Plans which meet agreed quality standards each term until 90% reach the required quality standard by April 2019, • An increase in the number of families reporting satisfaction through “end of process” surveys in the process of the EHC Needs Assessment and of the content and layout of the EHC Plan where issued by April 2019 • An improvement in quality of documentation submitted for an Annual Review as demonstrated by clearer and more child/person-specific decisions being made by April 2019 • An increase in the numbers of Annual Reviews taking place at the right time, submitted to the SEND Service within timescales with a timely response to parents/carers regarding the decision by September 2019 • Increased clarity on roles and responsibilities as demonstrated by more effective responses to requests for advice and attendance at Panel/decision making by November 2018 • Commissioners providing quarterly assurance report to the SEND implementation group for commissioned health services.
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	<p>from Sutton Parent Forum and all partner agencies including schools and Health services</p> <ul style="list-style-type: none"> • Re-establishing a rigorous Annual Review processes in liaison with education settings and key partners to ensure appropriate monitoring of outcomes and progress of children and young people • Co-producing a protocol defining purpose, desired outcomes and professionals' roles and responsibilities in SEND processes. • Further development of Synergy to enable the measurement of longer term outcomes of EHC Plans (NEET, qualifications, attendance, exclusions, etc.) 			
2.3	<p>Develop a rolling programme of training for professionals who provide advice for EHC Needs Assessments to ensure the advice provided is person-centred and outcomes focused.</p>	HoSEND	<p>A training programme will be agreed by September 2018</p>	<p>This will be measured by</p> <ul style="list-style-type: none"> • An increase in the timely receipt of advice from professionals each term until 80% meet the required timescale by April 2019 • An increase in the advice meeting the agreed quality standards each term until 90% reach the required quality standard by April 2019 • An increase in the number of EHC Plans being issued within the required timescales each term until 80% meet the required timescale by April 2019 and where they are not meeting the timescale, this is for an appropriate, evidenced reason.

2.4	Support Case Officers to attain SEND Case Officer qualification, phased in line with normal business as usual requirements	HoSEND	Courses to start from September 2018	This will be demonstrated by <ul style="list-style-type: none"> • The percentage of Case Officers holding or working towards the nationally recognised SEND Officer qualification reaches 100%. • An increase per term in the number of families returning a positive “end of process” survey regarding the service by September 2019 • Of those returning an “end of process” surveys, an increase in the number recording ‘satisfied’ or above by September 2019
2.5	Improve the SEND case management system, Synergy, to <ul style="list-style-type: none"> • Promote more effective use of the system • Ensure effective data recording leading to more accurate <ul style="list-style-type: none"> ○ caseload management ○ data reporting ○ data analysis at an individual, team and area level 	CSD; HoPBC;	Synergy will be in place and fully functional by April 2019	This will be demonstrated by <ul style="list-style-type: none"> • 100% of Case Officers who have been working with the SEND Service for more than three months report that they are able to use the Synergy system effectively and efficiently by April 2019 • Improved caseload management and prioritisation of tasks by April 2019 • An agreed set of reports produced and accurate data shared monthly by April 2019 • Additional reports are available to inform pupil progress and planning by September 2019
Improve quality of outcomes through an overall Quality Assurance Framework of SEND processes				
2.6	Complete a SEND training / skills needs audit with key stakeholders (as represented on the Implementation Group and including PVI / Early Years’ settings where possible) to <ul style="list-style-type: none"> • Identify training needs accurately 	CSD; PQA Manager; ADQN; CLD	A skills and training audit will be in place by November 2018	<ul style="list-style-type: none"> • Leads from each partnership have contributed to the training needs assessment by September 2018 • The audit has been reviewed and approved by the SEN Implementation Group by October 2018

	<ul style="list-style-type: none"> • Inform the development of an annual training programme across the Local Area. • Drive the 'learning culture' of the Local Area 			<ul style="list-style-type: none"> • Appropriate training programmes have been sourced and funding arrangements agreed by November 2018 <p>The impact of the training will be measured by each service in September 2019 and will assess the increase in the understanding and practice of</p> <ul style="list-style-type: none"> • how SEND are identified, assessed, met and resolved • What early intervention looks like and how it is implemented • How interventions impact positively on SEND and reduce the need for more statutory interventions later • How to assess for and provide meaningful interventions or advice in a timely way
2.7	<p>Develop and implement Quality Assurance Strategy and Quality Assurance activities applicable to SEND services within the Sutton local area. This will include roles and responsibilities as well as required standards.</p>	<p>PQA Manager; AD E&SEND; AD CSC; AD ASC; ADQN</p>	<p>A Quality Assurance strategy will be in place by November 2018</p>	<ul style="list-style-type: none"> • The Quality Assurance Strategy and relevant activities co-produced and agreed by relevant services to include health services, education settings, providers from the private and voluntary sector, and parent/carers by November 2018 • All commissioned services and contributors to the EHC Needs Assessment process are able to demonstrate that they understand and meet the quality assurance standards, as evidenced through audits and as demonstrated through contributions to multi-agency meetings, the provision of appropriate and timely advice, the provision of appropriate services etc by April 2019

				<ul style="list-style-type: none"> Health Commissioners provide quarterly assurance report to the SEN Implementation Group for commissioned health services from September 2018.
2.8	<p>Develop a performance management framework for all services who contribute to achievement of our Vision, including:</p> <ul style="list-style-type: none"> A strategic performance management dashboard used to report to the LBS People Committee and the CCG Board. Performance KPIs for Cognus through robust contract management Performance KPIs for all providers under the local area commissioning arrangements Performance KPIs for all services within the CCG and the Local Authority 	CSD; PQA Manager; ADQN	A performance management framework will be in place by December 2018	<ul style="list-style-type: none"> Performance management information is reported to each group identified in Governance section on a monthly, quarterly or termly basis aligned to the meeting schedule of each group from September 2018. The performance management dashboard used to report to the CCG Board and LBS People Committee is published on the Local Offer website.

3. <i>“Inequality of opportunity for families, which has arisen from a serious decline in the availability of an effective independent advice service in Sutton”</i>				
	Action to be Taken	Lead(s)	Timescales/key dates	Success Criteria/Evaluation Framework
Improve our Sutton IASS				
3.1	Additional staffing to be recruited (1.4FTE in total) in collaboration with Sutton Parent Carers Forum which ensures increased and appropriate levels of support to families.	HoSAS	Additional staffing will be in place by end of July 2018	<p>This will be measured by:</p> <ul style="list-style-type: none"> ● Families and young people reporting increased satisfaction with and confidence in the SIASS service as a direct result of improved communication and access by December 2018 through a termly questionnaire for those who used the service. ● Parent/carer confidence levels reported as increasing on a termly basis
3.2	Deliver a co-produced Business Plan with stakeholders which sets clear service outcomes and KPIs matched explicitly to promoting service delivery to meet the needs of Sutton parents/carers and young people.	HoSAS	A business plan will be in place by August 2018 and will be implemented by April 2019	<p>This will be demonstrated by delivering by April 2019</p> <ul style="list-style-type: none"> ● A robust evaluation framework of the SIASS outcomes and KPIs to ensure that: <ul style="list-style-type: none"> - The information given is accurate, up to date and relevant - SIASS staff manage their caseload effectively and understand their role as professionals - Maximise SIASS staff attendance at meetings between families and settings - More families are using the service and understand the role of SIASS - A greater range of families are accessing the service

				<ul style="list-style-type: none"> - An increased number of young people/parents are reporting an increased level of satisfaction from the service
3.3	Ensure all staff working for SIASS are provided with appropriate and targeted training and that this is in collaboration with parental stakeholders and other LA SEND priority training. This will ensure that SIASS can effectively respond to the full range of parental and young people enquiries.	HoSAS	By November 2018 SIASS staff will be provided with training.	<p>This will be demonstrated by</p> <ul style="list-style-type: none"> • Feedback from families indicating a high level of satisfaction with the quality of information, advice and support received by April 2019 measured through a termly questionnaire for those who used the service
3.4	Conduct a full review of mediation/disagreement resolution services on an annual basis to ensure that they provide effective support for families	CSD; SEND PM	A review will be completed by December 2018	<p>This will be demonstrated by</p> <ul style="list-style-type: none"> • A revised and relevant contract for Mediation and Dispute Resolution services in place by January 2019 • Families reporting increased access to mediation/disagreement resolution processes by January 2019 through a “end of process” survey • Evidence of a high level of satisfaction with the quality of the services offered by April 2019, measured through “end of process” surveys • Fewer cases proceed to SENDIST by April 2019 • A decrease in complaints to the SEND Service by April 2019 • An increase in compliments to the SEND Service by April 2019

3.5	<p>Convene a half termly surgery for families organised by Sutton Parent Forum with representation from SIASS, SEND, Health, Social Care, EP, SPF in order to:</p> <ul style="list-style-type: none"> • Promote person-centered, high quality advice and support • Foster an ethos of co-production which will promote joint working partnerships 	<p>Sutton Parent Forum; CSD; AD E & SEND; DMD CCG; Head of Disabilities Service</p>	<p>Half termly surgeries will start from September 2018</p>	<p>This will be demonstrated by</p> <ul style="list-style-type: none"> • SIASS supporting families and young people more frequently and effectively than was the case August 2017-March 2018 • Families and young people reporting increased satisfaction with their involvement than was the case August 2017-March 2018 • Case studies from the surgery approach demonstrate improved relationships between LA professionals, SIASS and families and stakeholders
Improve our Local Offer and redesign our Local Offer Website				
3.6	<p>Increase the number of children able to access support within the Local Area, and consequently reinvest High Needs Block resources in the local area, by:</p> <ul style="list-style-type: none"> • Ensuring local mainstream and special settings receive appropriate support to meet the needs of children and young people with SEND through reviewing the provision, needs, expectations and funding, • Working with parents to develop their understanding of local maintained provision (and see 1.9) • Reviewing Independent and non-maintained (INM) placements in which Sutton pupils with SEND are placed with Educational Psychologists and Social Workers 	<p>CSD; PQA Manager; AD CSC</p>	<p>Changes will be implemented for the 2019/20 financial year</p>	<ul style="list-style-type: none"> • Appropriate provision and funding for top-ups/Element 3 are agreed by December 2019 (Schools Forum) • More children and young people educated locally where appropriate, and increasing from the current 85.1% to be in line with Outer London Average of 90.8%, by September 2020 • All placements have had agreed reviews completed in partnership with young people and parents by April 2019 • Annual reviews are completed with case officers and / or quality assured by case officer or an EP by April 2019 • More effective and robust commissioning of educational independent and non-maintained placements where these are needed, as demonstrated by a decrease from 9% of Sutton pupils being educated in NMI provision by September 2020

	<p>(latter if residential placements) to ensure outcomes are achieved efficiently and suitably;</p> <ul style="list-style-type: none"> • Where outcomes are not being achieved, take proactive steps to address this including developing the Local Offer (ie what is available in the local area) to meet needs more effectively • Use the South West London regional Commissioning Consortium to support the commissioning and quality assurance of INM provisions 			<ul style="list-style-type: none"> • 52 week placements and LAC arrangements are reviewed with social care staff by September 2019
3.7	<p>Appointment / identification of Lead Local Offer Officer to update and relaunch Local Offer website with key priorities of:</p> <ul style="list-style-type: none"> • Working with the LA and CCG communications leads to deliver the actions in the communications strategy as relevant to the Local Offer (see action 1.6) • Ensuring the content can be accessed easily by users • Providing clear, comprehensive and up to date information about the available provision and how to access it • Making provision more responsive to local needs by directly involving young people with SEND, parents, carers and service providers in the development and review 	HoSAS	A lead local offer officer will be in post by October 2018	<p>This will be demonstrated by</p> <ul style="list-style-type: none"> • Evidence of a higher volume of parents and young people using the Local Offer website by April 2019 • Feedback from website users confirming that the site is easy to access, engaging and contains the information that users need by April 2019, • Services being accessed more appropriately, sooner and with ease by residents

	<ul style="list-style-type: none"> Ensuring that parents, carers, young people and other stakeholders such as education settings understand the remit of the Local Offer and the purpose and function of the Local Offer Website within that 			
3.8	Extend and improve the reach of SIASS and Local Offer website by communicating the changes and developments to stakeholders using a range of media including attendance at key forums and events and a presence on social media	HoSAS; AD E& SEND	A refreshed Local Offer website will be in place by January 2019	<p>This will be demonstrated by</p> <ul style="list-style-type: none"> Stakeholders reporting increased awareness of the Local Offer and SIASS as measured through a professionals' questionnaire every 6 months by April 2019 Providers and stakeholders demonstrating an improved knowledge of how to access and/or signpost these services by February 2019
3.9	Produce a "You said, we did " document which evidences and emphasises the impact of feedback from families on the Local Offer, SIASS and issues arising from surgeries and case studies	HoSAS	First 'You said we did' in place by December 2018, then annually produced	<p>This will be demonstrated by</p> <ul style="list-style-type: none"> Families reporting increased confidence and engagement with SIASS and Local Offer website through a termly questionnaire by April 2019 . Parents, carers and young people reporting through feedback forms at the end of parent/carer events and consultation documentation that their views are valued and can influence policy and practice by December 2018

8. GOVERNANCE

- 8.1. The Written Statement of Action will be overseen by the following Governance arrangements:
- 8.2. Lead officers - The lead officer responsible for the strategic implementation of the Written Statement of Action is the Assistant Director for Education and SEND (LBS) who chairs the multi agency SEND Implementation Group (see above). The Deputy Managing Director Sutton CCG is responsible for ensuring health commissioners and providers actively contribute to the SEND Implementation Group and acts as the first point of escalation in respect of health matters. The Implementation Group is collectively responsible for the delivery of the Written Statement of Action. The Implementation Group and the AD Education and SEND are supported in operational matters by the SEND Programme Manager.
- 8.3. Operational Governance - the Implementation Group works on the day to day actions in the plan through the identified workstreams. The SEND Programme Manager meets on a regular basis with the leads of each of the identified workstreams to ensure actions have progressed within timescales. The SEND Programme Manager produces monthly progress status reports and reports to the Assistant Director for Education and SEND. Reports from the Assistant Director for Education and SEND will be provided to the Local Authority Major Change Board (monthly) and the Quality Committee of Sutton CCG (monthly).
- 8.4. Whilst the Local Authority and the Sutton Clinical Commissioning Group is ultimately accountable for the Joint Written Statement of Action, much of the Joint Written Statement of Action will be implemented by Cognus Limited. Cognus is a local authority controlled trading company which delivers the majority of the LA's statutory and non statutory school support services - including the SEND service. This relationship is governed by a commissioning agreement and effective contract management between the company and the Local Authority (the Assistant Director for Education and SEND being the lead client representative). A number of Cognus employees are part of the Implementation Group and lead on the 4 workstreams and the company's Board of Directors will provide clear monitoring of progress to ensure that the clients requirements are met.
- 8.5. Strategic Governance - strategic oversight and overall accountability for the Written Statement of Action is provided by the below:
- A. LBS Elected Members - LBS People Committee (quarterly)
 - B. CCG Quality Committee (quarterly)
 - C. CCG Governing Body (quarterly)

Governance of Sutton WSOA

