

## **Brent Children's Trust**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

### 3. Partnership focus on outcomes and impact

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

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

#### 4. Key areas requiring action

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

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

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

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

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

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

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

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

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

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

