Suffolk County Council

NHS West Suffolk Clinical Commissioning Group

NHS Great Yarmouth and Waveney Clinical Commissioning Group

HealthEast

NHS Ipswich and East Suffolk Clinical Commissioning Group

SEND PROGAMME RISK REGISTER 2021/23 Update

		Probability				
		1: Rare	**2: Unlikely**	**3: Possible**	**4: Likely**	**5: Almost Certain**
Impact	**5: Catastrophic**	5	10	15	20	25
	4: Major	4	8	12	16	20
	3: Moderate	3	6	9	12	15
	2: Minor	2	4	6	8	10
	1: Negligible	1	2	3	4	5

Probability and impact matrix

Risk score (in bold in the following table) is impact x probability

Reviewed: July 2022

Next Review Due: December 2022

#	Description	Owner	Pre Mitigation Prob	Pre Mitigation Imp.	Response/Mitigation	Post Mitigation Prob	Post Mitigation Imp.	Current Position	RAG now
Working Together									
1	**Communication and engagement** is ineffective and as a result, managers, practitioners, service users and stakeholders are not sufficiently informed, and involved in the changes we need to make.	Ros Somerville Lianne Nunn	3	4 **12**	• Communications is established as a Priority Workstream. (done) • Co-production of comms with all partners for key messaging. (on-going) • Routine practice of developing a key message from every strategic SEND meeting. (not yet consistent) • Introduce a routine feedback loop for service users after each involvement with services to provide regular feedback. (not yet consistent) • Ensure that all involved in delivering services are clear about future plans and are able to communicate them to parents and carers. (on-going) • Access to information for digitally excluded (print on request) • Access to information where English is not first language (Language Line, Translations, Google Translate) • Embed learning from complaints, mediations and Tribunals and LGO decisions • Recruit to a Communication & Engagement Officer, to lead communications across Inclusion with all partners and stakeholders • Partnership meetings are planned and well attended by Health & Social Care, to share information, updates and solve issues	2	4 **8**	• SEND Local Offer regularly updated (on-going) • SEND Parent/carer Newsletter Local Offer News | Issue 1 | February 2022 • Activities Unlimited News and newsletter (on-going) • Inclusion News issued for practitioners (on-going) • Intended publication of SEND Strategy 2021-23 delayed because of Independent Review (Sep 21), this will remained as un published as we were towards the wider SEND review. • Regular updates on SEND Independent Review (on-going) • New Parent Carer Forum (Nov 21) • 'Time to Listen' sessions have been set up for senior leaders to regularly hear directly from parents/carers – Ongoing • Senior Leaders attend SPCF Open Forum events to meet and talk to parents • Senior Leaders attend schools to meet and talk to Young People and hear their thoughts and views • New complaints management form implemented to support improved analysis of complaints, due to be launched Sept-22 • See SEND Priority 1 milestones and action planning for report for more detailed update	

								• New Communications & Engagement Officer due to start September 2022 • Partnerships meetings are well attended • SEND Programme Managers is regularly requested to attend team meetings to share updates. • Open letter from Inclusion Assistant Director to all stakeholders to share progress and next steps • SEND Roadshow due to commence in Autumn 2022 with Inclusion Leadership ½ termly meeting with school leaders.	
2	Failure to undertake **co-production** effectively across the SEND system, including children and young people leading to poorly designed services and provision and continued CYP and parental frustration.	Ros Somerville Lianne Nunn	3	4 **12**	• Embed co-production across the SEND strategy and action plan (done) • Embed co-production into recruitment and induction (on-going) • Develop Family Services Staff co-production and Person-Centred Planning skills • Active engagement with Suffolk Parent Carer Forum (on-going) • Active engagement with Young Person's Network • You said, We did to be re-invigorated (on-going) • Ensure all staff are aware of the Ideal Worker	2	4 **8**	• Co-production training forms a key element of Integrated Plan following the Independent Review completed • Young people on interview panels for senior roles wherever possible Young people have been involved in recruitment panels where this has not been possible we have included questions from the YP. • New Parent Carer Forum commenced Nov-21 SPCF • Active Young Persons' network (on-going) • You said, we did on-going, but more need to better focus on impact on day-to-day experience and outcomes for families • Coproduction training for Senior Leaders and SPCF in (completed Feb-22 • All job descriptions from March 2022 include reference to Ideal Worker	

								• You said we did for schools following DfE survey in December 2022. You said we did, School Survey response • New Signs of Inclusion training supports colleagues to train to have strength based conversations which empowers workers to co-produce with confidence • Mapping of co-production and YP stakeholder groups underway in Norfolk and Waveney to create library of 'resources' and reduce duplication. System wide insight and engagement group in place. • SPCF and NWICB met to agree scope of partnership working with invitations to thematic stakeholder groups extended • Co-production of NDD information packs for Waveney parents and professionals in final stages of completion. Awaiting final review by SCC officers	
Resources									
3	Delays to **new Special Schools / Specialist SEND Units** due to open Sept 22/23 mean there may not be a sufficiency of specialist placements	Gemma Morgan	3	4 **12**	• Close monitoring of progress of plans for additional 870 specialist education places over a 5-year period to 2024 (on-going) • Communication with affected families on progress of new units (on-going)	3	3 **9**	• Some delays from sourcing materials due to Covid and also planning issues • See Programme Board SRO report for detailed updates • Contingency plans put in place by provider development and supporting schools	

4	**Increased demand**, including from the impact of Covid, may prevent or limit the ability of services to deliver the right service from the right people at the right time (Specific risk for SALT and OT at Risk 15)	Ros Somerville Lianne Nunn	5	5 **25**	• Reconfigure Specialist Education Services (done) • Transformation of Mental Health Services (in progress) • Effective early identification and intervention, and Graduated Response approach across education, health, mental health and care, to reduce the risk of escalation of needs • Co-production with parents to show how needs can be met in mainstream provision • Work with schools to develop inclusive practice and to make adjustments to meet needs in mainstream provision • Effective management of waiting lists • SEND Sufficiency Plan to be reviewed to understand mismatch between demand and supply (by Summer 2022) • Capacity review of Family Services • Trial Valuing SEND as a tool for schools to use to assess the needs of CYP, to ascertain if needs can be met in mainstream provision	4	4 **16**	• Continued escalation in requests for EHC Needs Assessments and Plans with periodic peaks during the year. An additional investment of reserves £350K in 2021/22 and a further £1.1m has been invested to create focus statutory posts, and increase capacity is due to be invested 2022/23 to support the review of systems and processes for the core assessment to increase caseworker support. • Significant demand pressures on health and mental health services exacerbated by Covid • Currently completing wider trial of valuing SEND which is a tool for schools to use with CYPF to identify CYP needs and if this can be met in current mainstream school • As identified in the capacity review Family Services are currently understaffed by at least 30 officers, an additional £1.1 has been agreed, however this is may not be enough to respond to the new ways of working and the upcoming SEND Review of the Code of Practice. • Spring 22 trial of Valuing SEND in 4 schools • Summer 22 extension of Valuing SEND trial in more schools. • NWICB leading 4 year integration programme that includes additional posts for OT services	

								• NWICB £1m waiting list initiative for NDD assessments is live • Funding for additional posts to address Waveney EHCP SLT provision agreed June 2022	
5	**Budget constraints** may prevent or limit the ability of services to deliver outcomes from the SEND Strategy	Ros Somerville Lianne Nunn	4	4 **16**	• Redesign High Needs Funding for schools to make fairer and more transparent (done) • Agree deficit reduction plan with Schools Forum (done) • Lobby government for fairer funding for Suffolk • Management of SEND capital programme, which has overspent for phase 1 at £4.6m and requires increase investment of £11.3m to complete the next phase, requested to cabinet (Jun-22) • Request to Cabinet to invest in phase 2 of capital programme, request for • Close scrutiny of spend from the High Needs Block • Flowdown of funding from NHS for mental health investment	3	4 **12**	• Potential £3m HNF overspend this year in 2021/22 • SEND Capital Board meet monthly and maintain tight scrutiny of the delivery of the SEND Capital Programme. Health are involved in this Board • To deliver more substantially on the objective to widen respite offer is a cost pressure that is not currently budgeted for. • Completed capacity analysis has indicated that Family Services need a invest of at least 30 more officers, wider review of how SCC respond to statutory duties, has provided intelligence that a different way of working would be more beneficial to CYP at risk of exclusion or on part time timetables. • Additional reserves £350K invested for 2021/22 and £1.1 for 2022/23.	
6	While High Needs Funding policy allows **HNF without an EHCP**, potential concern that this means it is not tracked	Ros Somerville	**3**	**2** **6**	• To consider whether policy changes needed	2	2 4	• Data from Gemma Morgan indicates 1650 children with no EHCPs receive HNF and up to 739 with an EHCP may not be receiving HNF. All schools submit a return to HNF to monitor funding. • Cabinet agreed to increase capital funding for the SEND Capital programme to cover overspend and increase funding for phase 2.	

7	**Capacity of all core partners to be able to commit required resources** to meeting the milestones in the SEND strategy	Ros Somerville / Lianne Nunn	4	4 **16**	• Appoint SEND Programme Manager (done) • Identify a strategic partner to support SEND Family Services (done) • Review capacity to meet needs in services • Undertaking a review of all objectives across SEND Strategy to ensure we are focusing on the right objectives at the right time to provide support, and outcomes for CYP • Invest in improving systems and processes	3	4 **12**	• £6.4 total investment across mental health and emotional wellbeing, including, All Age eating disorders, Crisis, Parent/Carer Helpline, Family support offer, MHSTs, MH nurses in acute hospitals and Kooth • Covid pressures affecting all services (Mar 20 onwards) • SEND Reform Grant has supported some additional capacity – but limited remaining • Mental Health Demand and Capacity Review underway (Summer 21) • Significant pressure on Health Services resources due to the aftermath and backlog caused by C-19 (June-22) • Significant pressure on schools including teacher recruitment (May-22) • SEND Family Services capacity reported that Family Services were under resourced by at least 30 officers, additional £1.1 has been invested to go some way to increase officers. (June-22) • Family Services capacity is still to be effectively increased, with recruiting starting for wider member in July-22 which will require induction and training • Liquid logic programme has started to move the process of EHCP to Liquidlogic to provide a casework management system.	

Services									
8	Continued progress in improving the **experience of families and young people, and impact, in relation to statutory assessments and specialist placements** to ensure needs are met in a timely way	Ros Somerville	5	5 **25**	• Strengthen QA arrangements system wide • Develop an Outcomes based on CYP 'I Statements' • Delivery of SEND Priority 2, including redesign of Decision-Making Panels process and the Phase Transfer Process • Ensure service delivery is compliant with statutory requirements • Strengthen training of staff around statutory requirements, person-centred planning and strengths-based conversations • Appoint DSCO to more fully involve social care services with EHC Needs assessments and Plans • Review Capita/EMS database to improve functionality (done) • Review electronic information sharing arrangements so they aid informed Panel decision making	3	3 9	• Work is in progress to improve how decisions are made at SEND panels to improve families experience for a timely and appropriate response. • Very significant improvements in EHC Needs Assessments and Plan timeliness (2020/21) • SEND Training Brochure produced (May 21) • 3 QA cycles completed in SEND Family Services (Nov 21) • Development of new Outcomes Framework has been hampered by limited resources • Improved weekly reporting from Capita/EMS supports managing casework, however vacancies have meant slower workflow. (Nov 21) • Specific draft plan, as part of Priority 2, to address Decision Making Panel Changes, but limited resources to develop at the pace needed. (Aug 21)' • SEND Decision Making and the Law' training started for all SEND staff with 120 staff attending the first session. (Nov 21) • A specialist SEND lawyer has been recruited (Oct 21) • A Designated Social Care Officer has been appointed to start Jan 22	

								• See SEND Priority 2 milestones and action planning for report for more detailed update	
9	Completion of **Speech Language and Communication Needs (SLCN) redesign** does not deliver effective and appropriately targeted services.	Garry Joyce Rebecca Hulme	3	3 **9**	<u>East & West Suffolk</u> • Implementation of Year 1 and 2 plans (done) <u>Waveney</u> • Implementation of plans (done) • SCC to review equity of funding compared to the remainder of Suffolk	2	3 **6**	<u>East & West Suffolk</u> • Increase in early intervention work, for example Speechlink in schools has been beneficial for referrals. There has been an increase in access to therapies but there are on-going waits. The challenges of C19 have meant we have not been able to operate the redesign as intended. • Further review work on SLCN for special school and special units and EHCP provision will be required <u>Waveney</u> - SLCN redesign completed and was implemented from April 2021, however the overlay of C-19 is delaying the impact that children and families will feel. There have been similar C-19 challenges to elsewhere in Suffolk. Families have - The backlog plan has been well received and the provider is making a positive impact across. Challenges around communicating specific patient waits are being worked through.	
10	Failure to deliver **mental health transformation**	Jaime Hawkins	5	5 **25**	<u>East & West Suffolk</u> • 10 year Mental Health Transformation Programme	4	3 **12**	<u>East & West Suffolk & Waveney</u> • High level model agreed based on Thrive Framework.	

	will result in needs not being met				Waveney • Redesign similarly happening.			• Demand and capacity work is now complete. CCGs/NSFT working together on implications for resourcing. • The Self Harm pilot at Ipswich Hospital is underway (E&W Only) • CHRIS Crisis Response service is in place from Feb-22. • Partnership approach being taken to support development and minimise any duplication with Complex Case Panel • MHSTs existing waves being embedded, new sites rolled out from July 21. Primary and secondary programmes being developed using the learning from pilots across the County – Implemented from Sept 21. • See Mental Health Programme Board reports for detailed updates • Mental Health CYP Senior Nurse appointed to James Paget Hospital to support crisis response and inpatient May 2022 • Eating Disorder Day Unit opened in June 2022 • NDD MH offer in design phase for 2022/23 for NW. Alternative pathway for those with autism/ADHD expected to ease access to tailored MH support •	
11	Risk that existing **ASD and ADHD pathways**	Garry Joyce	4	5	East & West Suffolk	3	4	East & West Suffolk	

	and provision is not effective in meeting rising levels of demand and complexity across the system			**20**	• Recovery Plans for ASD and ADHD • New Neurodevelopmental offer Waveney		**12**	Improvements to East and West Suffolk Neurodevelopmental Pathway | Community Directory - Impact of Covid means waiting times remain longer than target - Positive impact of Barnados involvement Waveney - Impact of Covid means waiting times remain longer than target - Diagnosis working effectively, however, challenges with provision. - (Nov 21) Pathway waits continue to be a challenge as with other services. Pathway reporting has been agreed with JPUH and should flow automatically after January 2022. The team are preparing new letters for families to provide updates regarding school observations. It appears families don't understand the impact of school restrictions during COVID and these being completed. - Existing capacity won't meet increasing levels of demand - Waiting list initiative expected to go live Oct 2022 - Plans to improve support for those without and without diagnosis active including, sensory support, MH services and training for the system -	

12	**Variable Inclusion practice in schools** results in higher than expected Permanent and Fixed Term exclusion	Ros Somerville	4	4 **16**	• Redesign of Specialist Education Services to provide a whole school approach • PEX Deep Dive (done) • Investment in Inclusion Quality Mark • Creation of new Education Access Team to support CYP that are at risk of exclusion and/or are on part time timetables.	3	4 **12**	• Redesign of Specialist Education Services completed (Summer 21) • PEX Deep Dive undertaken and actions plan in delivery. (Summer 21) • 2020/21 KPI data shows fall in PEX compared to previous year, but rise in Fixed Term Exclusions including for pupils with EHCPs and SEN Support Sep/Oct 21 data indicated on-going fall in PEX, however more exclusions in more recent data (Nov 21) Good take up by schools of early interventions, including Solution Circles, Keys to Inclusion and the new Inclusion Support Meetings, in this new academic year (Nov 21). • 34 Schools have signed up to the Inclusion Quality Mark, with 2 schools completing • A programme to roll out the sign up of schools to ensure as many schools in Suffolk is underway with a peer model of support • Recruitment to a new team Education Access Officers, who will lead in working with schools and children and young people for inclusive practice and to reduce exclusions and part time timetables.	
13	Failure to meet **Phase Transfer deadlines** (statutory timescales 15 Feb 22 and 31 March 22) mean Families and services do not have time to plan and	Ros Somerville	4	4 **16**	• Issue Annual Review Letters in a timely way (done, Oct 21) • Ensure receipt of Annual Reviews • Review processes for Specialist School Placements for November-March 2021	3	4 **12**	• Phase transfers for children transitioning into primary or secondary school in September 2022 improved from 22% (15 February 2021) to 82% (15 February 2022).	

	implement transition in cases							• Phase transfer for post 16, this year 32% were completed on time, this is inline with the 2021 level.	
14	That EHC plans are not forward thinking enough to focus on the needs, aspirations and independence as CYP move towards adulthood		4	4 **16**	• Ensure that all providers are routinely using the new transitions guide to support CYP and their families to plan for transition (on-going) • Introduce a new Moving Into Adulthood Plan (MIAP) as part of the EHC annual review from age 13 years from Sept 2019 (done) • Access to further funding will explore resourcing a moving in adulthood team/worker to focus and move this work forward	3	4 **12**	• See SEND Priority 4 milestones and action planning for report for more detailed update	
15	SALT and OT provision is not readily available to be commissioned as required.	Ros Somerville & Lianne Nunn			• A priority meeting has been convened with key stakeholders to review SALT & OT provision across Suffolk • Review training and qualification routes for Educational Psychologists, Speech and Language Therapists and Occupational Therapists			• A central commission route being sought through NHS and private providers. • Currently looking at training and qualifications offered by the University of Suffolk for SEND • Researching if Suffolk can provide a apprenticeship programme for SALT/OT'S <u>Waveney</u> • Funding agreed between SCC and the SLT provider Cambridge Community Services to ensure provision in Waveney meets the needs of the CYP with an EHCP • Norfolk and Waveney ICB have invested in CCS to deliver a backlog	

								recovery plan across Norfolk and Waveney • CCS are moving towards delivery of the Balanced System ® to improve outcomes for CYP • CCS have built links with the University Of East Anglia to recruit leavers and further support their training and education • CCS are part of a regional apprenticeship scheme for SLT's, with candidates starting in September 2022 • Occupational Therapy transformation programme underway for NW.	