

Gloucestershire SEND Commissioning Strategy

2019-2024



Gloucestershire
COUNTY COUNCIL

Context

This strategy sets out our assessment of the needs of children and young people in Gloucestershire with SEND and how we aim to meet them.

We know that children with additional needs do not always make the progress they should. The number of children with Education Health and Care Plans has increased rapidly over the last four years and whilst intervention work is underway permanent exclusions from school remain worryingly high. The high needs budget is overspending. We need to re-shape provision to meet needs effectively now and over the next five years and to make more effective use of our resources.

The strategy reflects:

- the requirements placed on local authorities and schools by the Children and Families Act 2014 and the SEND Code of Practice 0-25 (2015)
- The Joint Strategy for Children and Young People with Additional Needs (JAND), including Special Educational Needs & Disabilities (SEND) 2018 – 2021 agreed with partner agencies
- the High Needs Strategy agreed by Cabinet in January 2019

The strategic aims are to develop:

- an inclusive education system characterised by effective early intervention and supported by a skilled workforce able to access specialist support when it is needed
- high quality specialist provision available locally for those that need it
- a sustainable budget



Where are we now

Gloucestershire is situated on the northern edge of the South West region. In 2017, the resident population of Gloucestershire was estimated at 628,139 people. This represents an increase of around 42,720 people, or 7.3%, since 2007. In 2017, it was estimated there were 141,353 Children and Young People (CYP) aged between 0 and 19 living in Gloucestershire. Over the next ten years, Gloucestershire's 0 to 19 year old population is projected to increase by around 10,000 people or 7.1%, to around 151,400 in 2027. As of November 2019, 3,867 of Gloucestershire's children and young people (aged 0-25) had an EHCP. Of these 765 are aged 16 – 19 and 97 are aged 20 – 25. The number of children in care in Gloucestershire has shown a general increase over recent years. The number of children in care stood at 728 at the end of October 2019. There have been fluctuating levels of Children in Care (CiC) placement stability, with 8.4% (59 of 703) children having had three or more placements in the preceding 12 months (as at July 2018). The number of children in care per 10,000 of under-19 population as at July 2018 is 56.

Outcomes for some of the most vulnerable children and young people who have additional needs are persistently poor and the attainment gap between them and their peers continues to be too wide. In 2018 only 42% of disadvantaged pupils achieved the expected standard or above for reading, writing and Maths in Key Stage 2 (end of primary school) against 70% of other pupils and 20.5% of disadvantaged pupils achieved a strong pass (9-5) in both English and Maths at Key Stage 4 (end of secondary school) against 52.8% of other pupils.¹

Table 1: Numbers and proportions of EHCPs in each provision type November 2019.

Provision type	Current number of C&YP with an EHCP	Percentage
EY Settings	25	0.6%
Maintained Mainstream Schools / Academies	1,680	43.4%
Maintained Special Schools / Academies	1,171	30.3%
NMS / Independent Schools	207	5.4%
Alternative Provision Schools	39	1.0%
Elective Home Education	42	1.1%
General FE / Training Providers	438	11.3%
Special Post 16 Institutions (SPIs)	55	1.4%
Social Care Setting	2	0.1%
Awaiting Provision / No registered base	208	5.4%
Total	3,867	

Gloucestershire has a higher rate of children excluded from school than the national average – in the 2017/18 academic year 0.14% of the school population in Gloucestershire (123 children) was permanently excluded from school compared to 0.10% nationally. 49% of these were children with SEND which is a slight decrease from previous year². Primary PEX peaked in 2015/16 according to published data, and locally held data suggests a significant decrease in all PEX in 2018/19. Of particular concern is the rise in children of primary school age who are being ‘held’ in primary schools and the number children and young people who are removed from school by their families to home educate as they feel a school cannot provide the support they need. The high numbers of exclusions are also causing pressure on the current APS provision in county. It is becoming challenging for the local authority to meet the statutory requirement of providing full time education from the 6th day of permanent exclusion and successful transition to mainstream provision from the APS provision is slow and often unsuccessful. The lack of specialist SEMH provision in county also affects APS numbers of CYP with identified SEND needs and an EHCP.

The number of pupils in state-funded schools and academies identified as having additional needs without an EHCP (SEN Support) continued to increase this year, rising from 12,016 in 2018 to 12,372 in 2019³. The number of children and young people with SEND who require an EHCP to provide enhanced support to meet their needs also continues to increase, rising from 3,290 in January 2018 to 3,866 in November 2019⁴. The reason for this is unclear but suggests that more should be done early on to identify children and young people with lower level additional needs in an attempt to prevent these escalating. This work is being developed by the Early Years team in identifying needs and improving outcomes as well as embedding transition plans so that intervention work continues into primary school placements. The High Needs Strategy planned implementation phase will develop additional resource for primary schools.

Table 2: Out of County/INMSS Placements and Cost

Financial year	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20 ⁵
Number of pupils	110	133	169	166	166	236
Independent	94	86	110	116	116	191
Joint funded	16	47	59	50	50	45
Budget	£5,693,629	£6,255,836	£7,199,691	£8,199,691	£8,599,691	£9,890,000
Actual cost	£6,154,893	£6,446,190	£8,189,816	£8,923,761	£9,091,594	£11,790,000
Budget overspend	£461,264	£190,354	£990,125	£724,070	£491,903	£1,900,000

The number of children with complex needs has been increasing year on year and for a small number of these children and young people the complexity of their care, education and health needs requires specialist support outside of the county or in independent provision. Over the past two years the number and cost of these placements has increased. Work on developing more cost effective in county independent provision as well as more person centred outcome related provision particularly for post 16 placements in FE colleges has begun and continues to develop in line with the Post 16 banding pilot. The joint commissioning of out of county independent placements will be reviewed to ensure that these placements are cost effective and outcomes based.

¹ See LAIT for figures for KS2 (<https://www.gov.uk/government/publications/local-authority-interactive-tool-lait>) and Gov.uk Characteristics local authority tables for KS4.

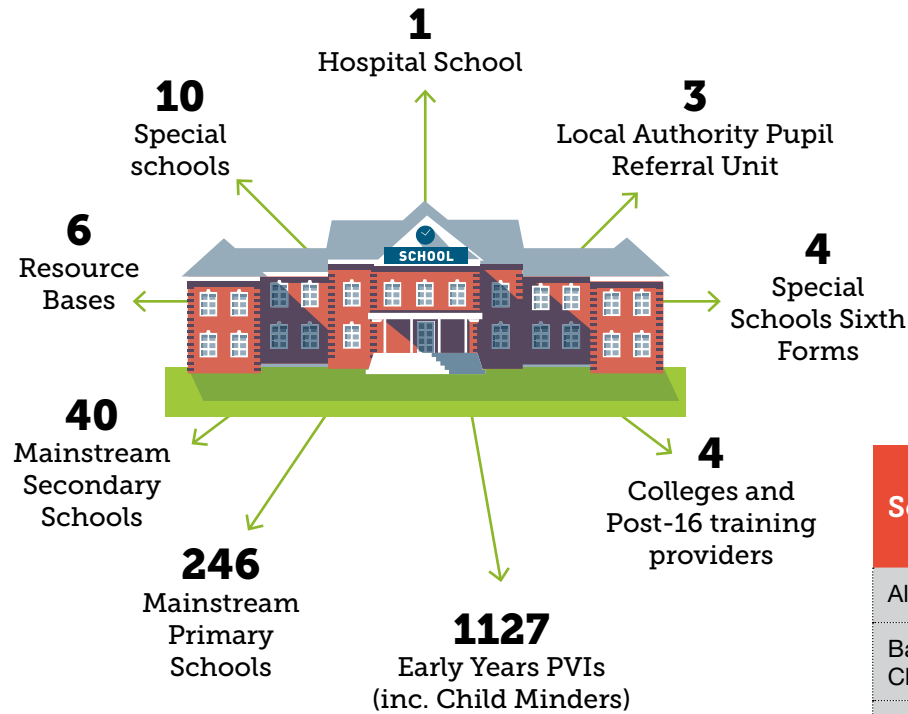
² See DfE: Permanent and fixed period exclusions in England (<https://www.gov.uk/government/collections/statistics-exclusions>).

³ Figures are based on data from the January School Census and relate to pupils on SEN Support in state-funded schools and academies in Gloucestershire (see: DfE: Special educational needs in England: January 2019, <https://www.gov.uk/government/statistics/special-educational-needs-in-england-january-2019>).

⁴ Figures relate to children and young people (aged 0-25) with an Education, Health and Care plan (EHCP) maintained by Gloucestershire County Council. Source: Capita One.

⁵ Note: 2019/20 figures are current year to date figures. There are still a number of referrals with Specialist Commissioning which will impact the year end figures which are not included within the numbers provided. Expected number of placements to hit the budget before year end is 31 at a projected cost of £410,727. This would bring the projected numbers to 267 placements (222/45), £11,668,927 giving an overspend of £1,868,928.

Overall Special Education Needs - Gloucestershire Provision



82.8% of state-funded schools in Gloucestershire are Good or Outstanding

91.6% of state-funded Special Schools are Good or Outstanding

The role of the Local Authority is to ensure sufficiency of places for all children including those with SEND within the maintained sector and our regional academies. In order to do this maintained special schools and academies are provided with commissioning briefs from the local authority. These clearly detail the types of need to be provided for, numbers of places being commissioned and admissions procedures for each school. There are occasions when it is necessary to commission services from external providers in order to support education delivery. In the context of continued rising demand, we will need to consider changes to our processes for deciding special school places to meet the increase in demand. We will continue with our strategy to formalise our partnership with independent providers to deliver a best value approach to low incidence high cost needs where there is a need for this provision.

Table 3: Numbers of commissioned special school placements as at November 2019:

School	Primary need	Age range	Commissioned places	Current placements (Nov 2019)
Alderman Knight School	C&L	4-19yrs	125	173
Battledown Centre for Children & Families		2-7yrs	40	41
Belmont School	C&L	4-16yrs	110	142
Bettridge School	C&L	2-19yrs	134	148
Heart of the Forest Community Special School	C&L	3-19yrs	100	109
Milestone School	C&L	2-16yrs	306	325
Paternoster School	C&L	2-16yrs	50	48
Peak Academy	SEMH	11-16yrs	60	70
The Ridge	SEMH	5-11yrs	40	49
Shrubberies School	C&L	2-19yrs	110	127
Total			1075	1232

What the data is telling us

An in-depth assessment of CYP with Education, Health and Care Plans (EHCP) has been carried out. The analysis sets out the following:

- Current numbers of CYP with an EHCP
- Breakdown of needs and phases of education
- Breakdown of primary needs against locality (in county)
- Breakdown of primary needs against places in maintained special school/academies (in county)
- Number of CYP in out of county placements by category of primary need
- The forecast of the total number of CYP with an EHCP
- Is summarised in Appendices 1 and 2

The factors to consider when analysing any potential shortfall in specialist placements must include the current levels of under provision within county and the significant reliance on independent non maintained educational provision to meet certain types of primary need. It must be noted that there will always be a need for a small number of places with external providers either for safeguarding reasons or where those needs are so complex it is not reasonable to expect needs to be met within the maintained special school sector.

As the Local Authority is attempting to reduce the number of places that are being made out of county and/or in INMSS provision, additional places will need to be created locally for SEMH needs as these are evidenced as being unable to be met within our current commissioned special school places. The figures which indicate the projected growth in the number of EHCP's being issued over the next few years, inform us of the continually rising needs and the requirement for additional resources.



The trend of an increasing year on year expenditure on INMSS placements would be indicative of both rising demand and a lack of growth within county therefore these CYP who cannot be placed locally near to their homes and communities should be the focus of future planning, particularly as in county placements could have the potential to be more cost effective. Our maintained special schools are oversubscribed and are being asked to consider consults for CYP with EHCPs that take some of them considerably over commissioned numbers. Further investigation needs to be carried out to determine where needs could be met in a mainstream environment, and to examine if the outcomes for these students are the same or different depending on whether or not they have accessed specialist provision. There will be a need for mainstream to be supported by a core offer of intervention, resource and training to support a more inclusive culture as well as a review of capacity and commissioned numbers for special schools.

- Gloucestershire County Council has increased the number of in and out of county placements in the independent school sector since 2014.
- SEMH needs have been shown to be the presenting need with most in-county provision shortfall (we do not have sufficient places in county). This means that a disproportionate number of CYP are going out of county or into independent provision for their education at a substantial cost to the High Needs Budget.
- Maintained special schools are oversubscribed and consideration needs to be given to commissioning more places in line with current numbers and capacities as well as developing a more inclusive mainstream culture.
- There has been a substantial rise in the number of CYP who require support through an EHCP. Current forecasting indicates this will continue to rise.
- Current APS provision is not meeting the statutory needs of the local authority or the commissioning requirements.
- Cost effective outcome based post 16 provision in FE colleges needs to be further developed.

Where do we need to be?

- Blurring lines between mainstream and specialist, including bespoke packages of support in order to maintain placements.
- Early Years children with additional needs including SEND should be included in universal settings with specialist input and assessment for complex children.
- LINC/hubs and mainstream inclusion developed and embedded in maintained schools and academies so that CYP are able to attend local schools whilst receiving appropriate interventions and support in order to achieve quality outcomes.
- C&I Centres/Resource Bases that reflect local demand, where outcomes are effective for CYP and that represent value for money.
- Special schools to focus on meeting more defined and complex needs (reflective of locality need and effective use of resources).
- Inclusion supported by LINC at primary level and devolved funding at secondary level.
- A new SEMH Free School in place to reduce costly OOC/INMSS placements.
- A Post 16 SEND offer delivered primarily by existing FE colleges providing increased flexibility with a focus on pathways to employment, independence and further education. This will provide CYP with an inclusive offer delivered in mainstream settings and will remove the need for post 16 expansion in existing special schools.
- Use of independent sector where necessary underpinned by robust commissioning and monitoring processes.
- A countywide vision for APS which is needs lead, underpinned by the FAP process and robust commissioning briefs and includes partnership work with third sector organisations.

How do we get there?

The local authority views this as a continual journey which will respond to increasing inclusion across all sectors and focus on the vision and principles outlined in the JAND and High Needs Strategies. The outline delivery plan focusses on two main priorities:

1. **Provision** and 2. **Monitoring and Managing Spend.**

Key themes running through each of the priorities

'Children and young people with additional needs including SEND to learn and succeed in local schools that understand, respond and meet their needs in a flexible way.'

Gloucestershire Looking to the Future 2019 – 2022 DRAFT

'Effective and efficient use of resources will guide decision making based on analysis of need, allocation of those resources, and evaluation against agreed outcomes.'

Gloucestershire Joint Strategy for C & YP with additional needs 2018 - 2021

Priority 1: Provision

What we need to achieve?	How we are going to do it?	By when?
Mapping provision, needs and gap analysis	1. Special School places document	January 2019
Post 16 Strategic Plan	1. Promotion 2. Implementation	Ongoing
Commissioning briefs for special schools and APS	1. Develop and co-produce commissioning briefs with Special School Heads to reflect the current provision in each school 2. Review briefs annually to ensure that they reflect current SEND needs within county and the provision that the local authority requires to meet these needs	March 2019 Annually
Early Years transition and pathways	1. Develop countywide assessment strategy	tba
Development of 3rd sector provision	1. Market analysis 2. Provider catalogue 3. Quality assurance	November 2019
High Needs Strategy and development of a 'mainstream plus' offer	1. LINC/HUB model implemented	January 2020
Improvement of local SEMH offer	1. Approval to commission new 75 place SEMH Special Free School 2. Sponsor identified 3. Delivery plan	October 2019 January 2020
Development of APS vision for county	1. Commissioning brief developed 2. Independent review of existing provision 3. Pilot with Young Gloucestershire 4. Overarching vision developed	November 2018
C & I Centres/ Resource Bases	1. Review and evaluation of provision 2. Review service level agreements 3. Sufficiency	January 2020

Priority 2: Monitoring and Managing Spend

What we need to achieve?	How we are going to do it?	By when?
Reduce independent placements and costs	<ol style="list-style-type: none"> 1. Monitor current placements 2. Attend annual reviews 3. Post 16 transitions to FE 	Ongoing
Review joint funding arrangements and commissioning processes	<ol style="list-style-type: none"> 1. Review current process 2. EHCP casework to be involved in applications 	
DPS	<ol style="list-style-type: none"> 1. Join West Sussex DPS 	March 2019
Post 16 Banding	<ol style="list-style-type: none"> 1. Evaluate Post 16 banding pilot 2. Roll out banding to all FE providers 	June 2019 September 2019
Banding for special schools and mainstreams	<ol style="list-style-type: none"> 1. Review current banding process for special schools 2. Design and implement new banding in line with the RAS 	January 2019 September 2019
Review and quality assure Post 16 high needs placements	<ol style="list-style-type: none"> 1. Review current placements and spend 2. Monitoring visits 3. Work with casework and adult social care to transition CYP 	

Monitoring and Review

- Attendance of JAND
- Regular reporting around delivery plan to Education SLT
- Annual reporting to HoS for CwAN (as Chair of JAN Mgmt) for inclusion of progress within annual review of JAN strategy.

Appendix 1: INMSS placements and spend

Table 4 shows a comparison with neighbouring counties of the numbers of children and young people in an INMSS by academic year:

Local Authority	2014/15	2015/16	2016/17	2017/18
B&NES	60	72	76	77
Bristol	88	99	78	74
Dorset	124	187	121	188
Gloucestershire	111	133	169	165
North Somerset	68	71	82	95
South Gloucestershire	86	94	106	
Wiltshire	129	133	134	

Table 5 shows a comparison with neighbouring counties of the total spend on INMSS placements by academic year (£ millions) of children and young people in an INMSS by academic year:

Local Authority	2014/15	2015/16	2016/17	2017/18
B&NES	3.1	3.7	5.0	5.6
Bristol	4.7	5.0	5.3	4.8
Dorset	n/a	11.8	10.1	14.0
Gloucestershire	6.2	6.4	7.8	8.5
North Somerset	2.3	2.4	3.0	3.7
South Gloucestershire	6.4	7.1	8.0	
Wiltshire	6.5	8.0	7.6	

This data shows that since the SEND reforms were introduced in 2014, Gloucestershire has experienced a 48% increase to in INMSS placements made. This has resulted in an increase spend in Gloucestershire of 37% on these placements.

Table 6 shows the distribution of Primary Need by National Curriculum Year in INMSS as at September 2019.⁶

National Curriculum Year	ASD	HI	MLD	PD	PMLD	SEMH	SLCN	SLD	SPLD	VI	Total
0				1	1						2
1							1	1			2
2							1				1
3				2							2
4	2				1	1		2			6
5	1			1	2	1		1			6
6						3	1		1		5
7	1		5			5		1			12
8	3		3	2		21	2	3			34
9	5	1	1			18	3		1		29
10	8		1	2	1	25	2				39
11	6		8	1		31	2	2			50
12	3		2		2	8	1	2			18
13	1			1	2	5	1	2		1	13
14			1			2					3
Total	30	1	21	10	9	120	14	14	2	1	222

This data shows that by far the highest category of need being catered for in INMSS is Social Emotional Mental Health (SEMH) and that these are heavily weighted in the secondary sector.

⁶ Based on the need recorded in the OOC Commissioning Spreadsheet. This may differ to the need recorded in the child / young person's EHCP. Figures include a small number of pupils who do not have an EHCP.

Appendix 2: Specialist SEND provision in Gloucestershire

Table 7(a) shows children and young people (aged 0-25) with an EHCP by Primary Need and Locality as at November 2019 (based on the need recorded in the C&YP's EHCP).

Locality Area ⁷	ASD	HI	MLD	MSI	OTH	PD	PMLD	SEMH	SLCN	SLD	SPLD	VI	Total
Cheltenham	151	7	210	1		45	11	125	82	21	14	4	671
Cotswold	72	6	114			28	6	70	54	22	12	2	386
Forest	96	8	149			41	12	97	86	30	15	4	538
Gloucester North	52	3	94			26	7	76	74	19	4	4	359
Gloucester South	144	6	185	1		38	17	136	130	40	14	8	719
Stroud	136	9	159	1	2	40	11	111	87	20	14	3	593
Tewkesbury	110	9	150	2		30	13	107	93	17	6	4	541
Out of county	10		3		1	1	1	37	45	2	1		60
Total	771	48	1064	5	3	249	78	759	610	171	80	29	3867

Table 7(a) shows that the highest numbers of CYP with an EHCP are recorded in Gloucester South (719) with the lowest numbers in the Cotswolds (386). There are currently 60 CYP from out of county. The predominant primary need in Gloucestershire is Moderate Learning Difficulties (MLD), followed by ASD and SEMH⁸

Table 7(b) shows Pupils on roll at state-funded schools and academies in Gloucestershire with an Education, Health and Care Plan as at January 2019, by Primary Need (based on the need designated by the school in the January School Census) and locality.

Locality	ASD	HI	MLD	MSI	OTH	PD	PMLD	SEMH	SLCN	SLD	SPLD	VI	Total
Cheltenham	71	6	123	1	9	18	27	71	54	73	14	4	471
Cotswold	39	2	38	2	12	19	5	33	29	42	12	4	237
Forest	47	4	41	1	10	17	25	63	51	71	17	4	351
Gloucester North	57	6	35	1	7	14	12	32	27	60	8	2	261
Gloucester South	86	4	61		14	23	28	65	79	124	17	6	507
Stroud	76	5	38	2	14	16	14	71	64	97	14	4	415
Tewkesbury	84	7	54	4	23	18	17	55	48	56	10	2	378
Out of county	38	2	8	1	6	11	4	26	7	27	3		133
Total	498	36	398	12	95	136	132	416	359	550	95	26	2753

⁷ Locality is based on the child / young person's home postcode.

⁸ Based on the need recorded in the child / young person's EHCP.

Appendix 2: cont

Table 8(a) shows children and young people with an EHCP (aged 0-25) by primary need and age range, as at November 2019⁹

Age Range	ASD	HI	MLD	MSI	OTH	PD	PMLD	SEMH	SLCN	SLD	SPLD	VI	Total
1. Under 5	40	6	18		1	14	8	2	43	1	1		134
2. Aged 5 to 10	326	19	404	2		86	31	249	279	42	20	9	1467
3. Aged 11 to 15	251	15	413	3	2	76	23	335	184	64	28	10	1404
4. Aged 16 to 25	154	8	229	0	0	73	16	173	104	64	31	10	862
Grand Total	771	48	1064	5	3	249	78	759	610	171	80	29	3867

The data in table 8(a) provides a breakdown by primary need and age range of all CYP (aged 0-25) with an EHCP. Of those pupils with an EHCP, the majority are of Primary School age (1,467) as opposed to Secondary school age (1,404). We currently have 862 in Post 16 provision. It also shows us again that the most prevalent need for CYP across the age categories is MLD.

Table 8(b) shows pupils on roll at state-funded schools and academies in Gloucestershire with an Education, Health and Care Plan as at January 2019, by Primary Need (based on the need designated by the school in the January School Census) and Phase.

Phase	ASD	HI	MLD	MSI	OTH	PD	PMLD	SEMH	SLCN	SLD	SPLD	VI	Total
Primary School	163	17	149	6	60	80	17	164	245	38	44	11	994
Secondary School	108	15	141	1	21	53	1	121	78	8	43	10	600
Special School	227	4	108	5	14	3	114	131	36	504	8	5	1159
Total	498	36	398	12	95	136	132	416	359	550	95	26	2753

Table 9 shows the primary needs of pupils attending Gloucestershire Special Schools as at January 2019.

Primary Needs													
School:	ASD	HI	MLD	MSI	OTH	PD	PMLD	SEMH	SLCN	SLD	SPLD	VI	Total
Alderman Knight School	83	2	16	5	9			27	5	11		3	161
Battledown Centre for Children & Families	12						1			22			35
Belmont School	24	1	75		3			5	11	8			127
Bettridge School	1		5				38			96	3		143
Green Field Academy								3					3
Heart of the Forest Special School	3				1		22		1	70	1		98
Paternoster School	4						7	1	1	35	1		49
Shrubberies School			4				7			113			124
The Milestone School	101		3		1	3	40	1	13	155	2	1	320
The Peak Academy			2					57	4		1		64
The Ridge Academy	1	1	3					41	1			1	48
Total	229	4	108	5	14	3	115	135	36	510	8	5	1172

The data indicates that Gloucestershire Special Schools are supporting a high proportion of CYP with Severe Learning Difficulties followed by Autistic Spectrum Disorder (ASD).

Appendix 3: Acronyms

APS	Alternative Provision School
B&NES	Bath and North East Somerset
CiC	Children in Care
CYP	Children and Young People
DPS	Dynamic Purchasing System
EHCP	Education Health Care Plan
EY	Early Years
FAP	Fair Access Protocol
FE	Further Education
INMSS	Independent Non-Maintained Special Schools
JAND	The Joint Strategy for Children and Young People with Additional Needs
LinC/HUBs	Learning Inclusion Centres
OOC	Out Of County
SEND	Special Educational Need and Disability
RAS	Resource Allocation System
ASD	Autistic Spectrum Disorder
HI	Hearing Impairment
MLD	Moderate Learning Difficulty
MSI	Multi-Sensory Impairment
OTH	Other
PD	Physical Disability
PMLD	Profound and Multiple Learning Difficulty
SEMH	Social, Emotional, Mental Health
SLCN	Speech, Language and Communication Needs
SLD	Severe Learning Difficulty
SPLD	Specific Learning Difficulty
VI	Visual Impairment

Dated:
January 2020



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