

City of London

SEND PEER REVIEW

June 2024



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for children**



*LONDON BOROUGH OF
RICHMOND UPON THAMES*

Executive Summary

The smallness of the City of London Corporation is a real strength in relation to the services it provides for children and young people with special educational needs and disabilities (SEND). There is a strong multi-professional partnership across education, health and social care that works well to achieve the best possible outcomes for them. Professionals know children and young people extremely well and work with them and their families to develop effective plans to secure the provision that they need. As a result, children and young people typically have positive experiences and their educational and wider outcomes are strong.

The smallness of the City is also a challenge. The large majority of the services and support that children and young people with SEND need are located outside the City's boundaries. The local offer is therefore complex and can be difficult to navigate for parents, carers and some professionals. This is particularly the case for health services where there children and young people with SEND receive support from different health providers in different local areas and sometimes across different Integrated Care Boards.

Recommendations

1. Accelerate plans for the development of a neighbourhood health model so that children and young people with SEND can access the health services they need in their local area - **North East London ICB**.
2. Review the governance arrangements for SEND to minimise duplication and provide assurance that there is a clear focus on delivering the priorities in the SEND Strategy - **Local Partnership**.
3. Develop a clear definition of co-production across the local partnership and agree a small number of priorities for co-production with parents and carers **and** children and young people - **Local Partnership**.
4. Consider options to develop the cross-border commissioning of services to improve the SEND Local Offer, and particularly to increase the local availability of health services and specialist school places - **Local Partnership**.
5. Review the Local Offer website to update its content so that it includes the information that children, young people and families say they need, and to make it more easily navigable and searchable - **City of London Corporation**.
6. Finalise the strategy for alternative education provision - **City of London Corporation**.

7. Review SENDIASS to ensure it has the capacity to meet the needs of families in the City and is able to offer them the information and advice they need in a timely way, and consider options for the provision of advocacy services for parents- **City of London Corporation.**
8. Consider options to improve the timeliness of direct payments - **City of London Corporation.**
9. Develop a multi-agency quality assurance framework for SEND - **Local Partnership.**
10. Update the self-evaluation to fully reflect the strengths of the local partnership and explains how partners are working together to address challenges and areas for development - **Local Partnership.**

Peer Review

Peer Reviewers

Ian Dodds	Executive Director of Children's Services	LB Richmond upon Thames
Charis Penfold	Director of Education Services	Achieving for Children
Chike Nnalue	Associate Director for SEND	Achieving for Children
Catherine Marks	SEND Service Manager	Achieving for Children
Alison Stewart	Designated Clinical Officer for SEND	NHS South West London ICB
Diane Sanderson	Designated Social Care Officer for SEND	Achieving for Children
Megan Francis-Falkner	SEND Project Officer	Achieving for Children

Approach and Scope

It is important to remember that a peer review is not an inspection; peer reviewers act as critical friends by challenging a local authority and its partners in the local area to assess their strengths and identify their own areas for development. This peer review of SEND services involved reviewing data and documents provided by the City of London Corporation, sampling a small number of Education, Health and Care (EHC) Plans, and interviewing stakeholders involved in the local area SEND system, including meeting with parents, carers, children and young people. The stakeholders interviewed provided useful information and insight. At the request of the Local Partnership, the peer review was focused on preparation for the local area SEND inspection. We have therefore used the [Area SEND Inspection Framework and Handbook](#) (Ofsted and CQC, 2023) to structure our peer review activities, as well as the main findings and recommendations in this report.

Document and data review

The following documents were reviewed as part of the peer review:

Strategies and Plans

- Corporate Plan, 2024-2029
- Children and Young People's Plan, 2022-2025
- SEND Strategy, 2020-2024
- Short Breaks Strategy

Governance

- SEND governance and organisational charts
- Terms of reference for panels and boards
- Minutes of the safeguarding sub-committee

Document and data review continued

The following documents were reviewed as part of the peer review:

Guidance

- Education, Health and Care Needs Assessment Guidance
- SEND Ranges and Provision Mapping
- Alternative Provision Position Statement
- Early Years Inclusion Fund Guidance
- Steps to Adulthood Guidance

Quality Assurance

- Self-Evaluation, March 2024
- SEND Performance Dashboard, March 2024

Case Tracking

Case tracking was completed for six individual children. These cases were selected from all EHC Plans supported by the City of London Corporation. The following documents were reviewed in each case (where relevant):

- Case summary
- Professional advice submitted for the child's EHC needs assessment
- EHC Plan
- EHC Annual Review
- Social care assessments, plans and reviews
- Multi-agency audit

As part of the case tracking, conversations were also held with professionals involved in the case. The parent(s) or carer(s) of the child or young person were also contacted in order to understand their views and experiences.

Interviews

Meetings were held with the following groups of stakeholders:

- Strategic leaders responsible for SEND in the local area
- Education representatives from early years, school and post-16 settings
- Representatives from education, health and social care involved in transitions
- Parent-carers, including representatives from the City Parent-Carer Forum
- Representatives from health providers and the NEL ICB

Findings

Children, young people and their families participate in decision-making about their individual plans and support - STRENGTHS

Professionals know children and young people well and place them at the centre of their thinking and actions. Children, young people and their families are encouraged and supported to participate in decision-making about their EHC Plans and discussions about their futures. This includes children in need and children looked after by the City of London. The SEND caseworker knows children extremely well and works well with professionals to make sure that children's plans and support packages reflect their views and aspirations. The caseworker engages with families in an open and honest manner, and delivers on agreed actions in a timely way. As a result, there is a trusting relationship between families and the service, and any concerns or issues are resolved quickly.

Children's and young people's views are extensively represented in the advice provided for EHC needs assessments. Person-centred meetings are held to consider the advice in needs assessments and draft EHC Plans. There is good evidence that children's and young people's voices are included in discussions and decision-making about their individual plans and support. This includes children and young people attending meetings in person, sharing their views prior to the meeting, or making recordings to share with the meeting. Children and young people have access to advocates if needed, and information is presented in accessible and age-appropriate formats.

Children, young people and their families participate in decision-making about their individual plans and support - AREAS FOR DEVELOPMENT

Parents and carers would benefit from being able to access an advocacy service, particularly for any challenging meetings about their children's plans and support. This was particularly noted for parents and carers whose first language is not English. In inspection, you may wish to have examples of how you have supported parents whose first language is not English to access and understand their children's plans and provision.

Children and young people's needs are identified accurately and assessed in a timely and effective way - STRENGTHS

Support for children in the early years is a considerable strength with a good local offer in place for families in the City. There is effective identification of children with additional needs by health visiting services through the five mandated contacts. This enables effective signposting to services, the provision of support, and referrals for assessments where needed. The children's centre provides strong multi-agency support to children with additional needs and their parents or carers from the outset. This includes innovative speech, language and communication support, such as Verbo and Talk In Walk In sessions.

Professionals engage in early assessment activities with children and young people which provides a very good understanding of children's needs and the provision of support before a formal EHC needs assessment is completed. When a needs assessment is required, the provision of advice is generally of high quality, timely and effectively utilises the knowledge gained through any early assessment(s). As a result, EHC needs assessments are completed in a timely and effective way and **all** EHC Plans are completed within the statutory timescale. The quality of EHC Plans is good. There has been a sharp increase in the number of requests for needs assessments in recent months; however, this has been planned well and resources have been allocated to address the increasing workload.

Children and young people's needs are identified accurately and assessed in a timely and effective way - STRENGTHS continued

The City SEND Ranges provide a useful and effective framework for staff in early years and education settings to support the early identification of children's needs, provide advice on adaptations, and guidance on assessment.

Diagnoses are not needed for an EHC needs assessment. Children and young people do not wait too long for their needs to be assessed in high-demand services such as CAMHS or speech and language therapy. In part this is because a relatively large number of families choose to use private therapists for these assessments. There are waits for neurodevelopmental assessments; however, support is provided for those children and young people who are waiting. Specific pre-diagnostic support is offered to families waiting for Autistic Spectrum Disorder (ASD) and Attention Deficit Hyperactivity Disorder (ADHD) assessments.

Children and young people's needs are identified accurately and assessed in a timely and effective way - STRENGTHS continued

Planning and decision-making panels for individual children are effective and ensure timely assessment and the provision of support. The SEND Panel is responsible for decision making on EHC needs assessments, plans and annual reviews. These processes are effective. The Transitions Panel tracks, plans and supports the transition of young people into post-16 provision. There are also a number of operational partnership groups, such as the SENCO Network and Vulnerable Children Group, which support identification, assessment and planning.

Children and young people receive the right help and support at the right time - STRENGTHS

EHC Plans are effective at providing the support that children and young people need. Annual Reviews are timely and effective. The SEND caseworker and Educational Psychologist attend all Annual Reviews and amendments to plans are made in a timely manner, meaning that changing needs are responded to effectively. Early Annual Reviews are held where needed.

There is a strong multi-agency support offer for children through schools for children with an EHC Plan and those receiving SEND Support. The very large majority of children and young people attend education settings that meet their individual needs. Multi-agency support in schools includes therapies and a Mental Health Support Team (MHST). The local area provides training for school-based staff and other professionals so that they have the skills they need to support children and young people with SEND. There were examples of effective training provided by the educational psychology service and the Virtual School's DESTY emotional resilience programme.

Children and young people receive the right help and support at the right time **- STRENGTHS continued**

It is recognised that providing the right help and support at the right time for children and young people receiving SEND Support is more challenging because they attend a number of schools across a wide geographical area outside of the City. A tracker has been put in place to monitor the support and progress for children and young people receiving SEND Support. It is not clear whether this tracker is proving to be an effective tool and you may wish to review this.

There is good evidence that EHC Plans are effective and making a positive difference to children and young people. Educational and wider outcomes for children and young people with SEND are good. Parents provide positive reports about the quality of the help and support that their children receive from the services delivered or commissioned by the Local Partnership.

Children and young people receive the right help and support at the right time - AREAS FOR DEVELOPMENT

There is often a challenge in identifying the right health provider for children and young people with specific needs. This is because there are a number of different health organisations in different local areas and different Integrated Care Systems providing services to children and families in the City. This is confusing to some professionals and to families. Parents also report having to travel to settings some distance from the City to access health assessments and other services. This was particularly mentioned in relation to Child and Adolescent Mental Health Services (CAMHS). There are steps to establish a neighbourhood health model for The City and Shoreditch Park which could alleviate some of these challenges. Any opportunity to accelerate these plans would be welcome. For inspection, it would be beneficial to have a clear statement of intent, plan and timescale for this work.

Children and young people have good access to direct payments to obtain the help and support they need; however, some parents reported that there were initial delays in direct payments being arranged which meant that support could not be put in place in a timely way. You may therefore wish to review your decision-making and administrative processes for direct payments.

Children and young people receive the right help and support at the right time - AREAS FOR DEVELOPMENT continued

The Local Offer website is underdeveloped and some content is dated. This means that families, schools and professionals do not always know what is available to them and their children. This is particularly important given the network of support provided to children with SEND is delivered by a wide number of organisations both within and outside the City. Several stakeholders identified that shared services between the City and other local areas were not always accessible to them, especially when they are located or delivered by or in Hackney, Islington and Tower Hamlets. Families report that the Local Offer website is difficult to navigate, has a poor search function, and there have been technical issues with the accessibility and translation functions, which have now been fixed.

Children and young people are well prepared for their next steps and achieve strong outcomes - STRENGTHS

There is effective planning and support for children moving onto school and between the Key Stages of education. The transition to Key Stage 3 is well planned given that children and young people attend a wide range of school settings outside of the City. There is good evidence that children and young people are engaged in planning their next steps. They take a more active role in planning their post-16 position where one young person described being the 'driving force' in his education and life.

Preparation for adulthood routinely starts when young people reach the age of 14. They are referred to the Transitions Forum where there is effective multi-professional planning and joint working across education, health and social care providers, that supports smooth transitions to adult services.

Children and young people are well prepared for their next steps and achieve strong outcomes - AREAS FOR DEVELOPMENT

There is a good post-16 offer for young people in the City of London which offers a range of educational and vocational training opportunities. There may be the potential to better harness the City of London's connections and resources to expand the range of vocational opportunities for young people and strengthen their pathways into employment. This includes developing supported internship, traineeship and apprenticeship opportunities both within and beyond the City.

The role of the Preparing for Adulthood Partnership Lead could be strengthened and better embedded in the City. It is a shared role with Hackney. This would enable Preparing for Adulthood in the City developments to be taken forward at greater pace. This should include ensuring young people have access to good careers advice and guidance on the different education, training and access to employment opportunities open to them.

The complexities already identified in relation to health services for families living in the City are exacerbated during young people's transition to adulthood when further adult health services are introduced. This was particularly noticeable in relation to mental health services and the transition from CAMHS to adult mental health services.

Children and young people with SEND are valued, visible and included in their communities - STRENGTHS

Children and young people have different opportunities to participate in activities in their local communities. This includes inclusion in mainstream activities, targeted activities and access to short breaks. The Parent Carer Forum (PCF) identified the need to improve access to sports activities for children and young people with SEND. The City of London provided them with funding to work with Fusion Lifestyle and Exceptional Warriors to develop inclusive sports provision for children and young people with SEND at Golden Lane Sports and Fitness Centre. This includes swimming lessons, football classes and a teen gym for young people aged 15 to 25. The PCF has also worked with planners and others in the City of London Corporation to develop inclusive play facilities as part of the St. Paul's development.

There were good examples of children and young people with SEND being valued and celebrated in their schools and communities. This included the Shining Star Awards where the formal awards ceremony has been adapted to meet individual children's needs.

Children and young people with SEND are valued, visible and included in their communities - AREAS FOR DEVELOPMENT

Some parents were of the view that the City of London is not inclusive in its mindset, by which they mean that it does not proactively think about inclusion. Here they made a distinction between the directorate responsible for children's services, which they reported was very inclusive, and the wider City of London Corporation and its institutions, which they reported were not. There may be benefit in producing a clear statement or charter that sets out the City's ambition for inclusion in relation to children and young people with SEND.

There was some confusion from stakeholders, including parents, about what is meant by co-production. The majority of the examples that were given by parents and carers showed limited co-production, including the City giving funding to the PCF to develop services or being consulted on the development of a new SEND strategy and Carers' Strategy. The development of the play facilities at St. Paul's is a clearer example of co-production. There were no examples of co-production with children and young people. Although Ofsted and the Care Quality Commission use a fairly broad definition of co-production, it would be useful to develop an agreed definition of co-production across local area partners and with parents and carers, and it would be beneficial to agree a small number of co-production priorities each year. This could lead to an evidence-bank of examples that demonstrate impact and outcomes for use in an inspection.

Leaders are ambitious for children and young people with SEND and have an accurate, shared understanding of their needs - STRENGTHS

There is a clear vision and ambition for children and young people with SEND. The SEND Strategy is currently being refreshed based on a clear multi-agency assessment of local need. There is strong engagement from partner organisations in this work, as well as from parents and carers. Leaders respond to changing needs. For example, they have responded quickly to a significant increase in requests for EHC needs assessments. There are comprehensive strategies, plans and guidance that support the delivery of the main SEND Strategy.

There is strong engagement from partners in the strategic SEND Programme Board which is responsible for driving forward the SEND Strategy. The Board has representation from all local area partners as well as from parents and carers. The Board is jointly chaired by senior leaders from education, health and social care and there is a real sense of shared ownership and accountability for the strategy and the local area plans, as well as strategic teamwork. There is evidence that members use the Board to constructively challenge each other and hold each other to account.

The SEND Programme Board has identified clear priorities for joint working. These include supporting inclusion and early intervention, increasing parental engagement in co-production, and reducing waiting times for ASD and ADHD assessments.

Leaders are ambitious for children and young people with SEND and have an accurate, shared understanding of their needs - AREAS FOR DEVELOPMENT

The governance arrangements for SEND are complex. This is understandable given the complexity of arrangements across different local areas and different shared service arrangements. In addition to the SEND Programme Board, there are a number of other strategic partnerships that have some strategic oversight of SEND services, especially in the health space, including the Children, Young People, Families and Maternity Board and the Emotional Health and Wellbeing Partnership. Each partnership or board has clear terms of reference. Operational governance arrangements are much clearer. The Integrated Care Board (ICB) is completing a deep-dive on SEND at its System Quality Board which will look at SEND governance in health to determine whether any improvements are needed; however, it would be helpful to review all the strategic governance arrangements for SEND so that the local area can be assured that any duplication is minimised. For the inspection, it would be helpful to have a clear governance structure that explains arrangements.

Leaders commission services and provision to meet the needs and aspirations of children and young people - STRENGTHS

Leaders use local intelligence well to commission the services that children need and that help them to achieve their aspirations. Leaders have good oversight of the services they deliver and commission inside and outside the City. This means that they are confident in the effectiveness of services and are clear about outcomes.

Leaders commission services and provision to meet the needs and aspirations of children and young people - AREAS FOR DEVELOPMENT

Leaders report that securing specialist school provision for children and young people is increasingly challenging. This is a national issue, but is more complicated because there is no specialist school provision within the City with nearly all children attending schools in other local areas. There may be opportunities for development work and joint commissioning with other local authorities to enhance the local offer and expand access to specialist school places. Similarly, there are challenges in the cross-border commissioning of health services which may benefit from a coordinated approach for the City.

The provision of alternative education provision has not yet been fully considered. This is because the City has not yet needed to place any children or young people in alternative provision. Work has started to develop the City's approach to alternative education provision. Completing this at pace should be a priority.

Parents and carers report that some commissioned services provided by other local areas are ineffective for City families because they are not easily accessible or because there is insufficient capacity. Parents reported that SENDIASS is overwhelmed with demand from families in Tower Hamlets, meaning that City families do not get equal access to information and advice on SEND.

Leaders evaluate services, make improvements and create an environment for effective practice and multi-agency working to flourish - STRENGTHS

Leaders have effective oversight of services and understand where services need to develop or improve. For example, there is a very clear understanding and commitment to improving access to CAMHS services. Leaders from across the local area partnership are also focused on improving practice for individual children and young people, They monitor attendance, educational achievement and EHC Plan outcomes. They visit settings and routinely track the impact that each provision has on each child or young person with SEND, taking suitable action where necessary to ensure that all children achieve well.

Leaders evaluate services, make improvements and create an environment for effective practice and multi-agency working to flourish - AREAS FOR DEVELOPMENT

The self-evaluation does not fully capture the effective work and positive outcomes that are being achieved for children and young people with SEND in the City. The current self-assessment contains a lot of descriptive narrative. It would be strengthened by adding clearer and more current examples of the positive changes that have been implemented since the last inspection, highlighting the positive impact of services and the outcomes they achieve for children and young people. It should also explain the current challenges and areas for development and the actions that the local partnership is taking to address these. Quotes from children, young people, parents, school leaders and partners would add impact to the self-evaluation.

There does not appear to be an established quality assurance framework or programme for SEND services that can be used by multi-agency partners, although some quality assurance activity does happen within individual services, such as educational psychologists quality assuring each other's advice. A more formal quality assurance process would be beneficial, especially for the EHC assessment, planning and review process.