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Dear Mr Hill

### **Joint local area SEND revisit in Surrey**

Between 18 and 21 March 2019, Ofsted and the Care Quality Commission (CQC) revisited the local area of Surrey to decide whether the local area has made sufficient progress in addressing the areas of significant weakness detailed in the written statement of action issued on 24 October 2016.

As a result of the findings of the initial inspection and in accordance with the Children Act 2004 (Joint Area Reviews) Regulations 2015, Her Majesty's Chief Inspector (HMCI) determined that a written statement of action (WSOA) was required because of significant areas of weakness in the local area's practice. HMCI determined that the local authority and the area's clinical commissioning groups (CCG) were jointly responsible for submitting the written statement to Ofsted. This was declared fit for purpose on 27 March 2017.

**Inspectors are of the opinion that local area leaders have not made sufficient progress to improve each of the serious weaknesses identified at the initial inspection. This letter outlines our findings from the revisit.**

The inspection was led by one of Her Majesty's Inspectors from Ofsted and a children's services inspector from CQC.

Inspectors spoke with children and young people with special educational needs and/or disabilities (SEND), parents and carers, and local authority and National Health Service (NHS) officers. More than 1,000 parents' and carers' responses to the revisit's online survey were considered, in addition to information provided by individual parents. Inspectors met with representatives of Family Voice Surrey (FVS) and considered FVS's evaluations of the local area's progress, including through its

surveys. Meetings were held with groups of headteachers, special educational needs coordinators (SENCOs) and early years leaders from mainstream primary and secondary schools, from special provision, and from maintained, voluntary and independent early years providers. Inspectors met with health service leaders and staff and evaluated a freely chosen sample of education, health and care plans (EHC plans) with their relevant assessments. Inspectors examined a range of information about local area performance, including leaders' own evaluation of progress.

## **Main findings**

### **The timeliness, suitability and quality of statutory assessments and plans, including when statements are transferred to education, health and care plans.**

During 2017, the timeliness of new EHC plans and transfers from statements improved significantly, credited in a letter to local area leaders from the Minister of State for Children and Families in December of that year. Improvements in timeliness have continued steadily, rising to reflect a performance slightly better than the most recently published national picture by December 2018. However, leaders accept the rate of improvement slowed during 2018, so that their aspirational target of achieving 85% timely completion by December of that year was not met.

The area achieved the transfer of 99.7% of statements to EHC plans by the due date of 31 March 2018. Of the nine statements remaining, four were transferred by the end of May 2018, and all by the beginning of the new academic year.

The quality and suitability of assessments and EHC plans seen by inspectors, which included transfers from statements, is much improved. A 2018 parent and carer survey reflected higher levels of therapeutic and expert involvement in assessment and the production of plans than found nationally. However, the same survey also reflected lower levels of satisfaction than seen nationally with the influence that parents felt they had on the plans produced. Parents and school leaders continue to report inconsistencies in the quality of plans issued across the county's four quadrants, particularly relating to the accuracy of administrative details, the recording of changes agreed at annual reviews and plans' presentation.

While requests for assessments and EHC plans have continued to rise year-on-year since the inspection, the number of requests for tribunals began to show a reduction in 2018. Comparing figures for the first three months of each year, a reduction in requests has continued in 2019. In 2018, the proportion of tribunal requests proceeding to a hearing reduced to less than half that seen in 2017. Furthermore, of those applications which did not proceed to tribunal in 2018, a higher proportion than previously were settled by negotiation, possibly reflecting a positive outcome from the local area's newly 'restorative' approach to this process. Leaders are taking purposeful action to learn from tribunal applications and outcomes, to inform current and future improvements in line with parents' views and experiences. An ambitious

'reconciliation' pilot is in place, to review cases expertly and engage purposefully with parents to resolve their grievances, particularly if long held.

The local area has made sufficient progress to improve this previous area of weakness.

**The underdeveloped and often limited involvement of parents and carers, and the narrow range of those included in planning, monitoring and evaluating services. The ineffective promotion of the local offer, and the incomplete transition plan.**

Despite a shaky start, and a pause in some formal partnership arrangements during 2018, the representation and influence of parents and carers has improved overall since 2016.

With the support of the local area, including funding, FVS now has active coordinators in most of the county's districts and operates within a wider, well-established network of organisations and agencies. A clear memorandum of understanding is in place between the local area and FVS, refreshed annually to outline agreed specific priorities for engagement. Since 2016, the membership of FVS has almost doubled to approaching 2,000 members. The organisation is now actively seeking to develop the profile of its membership, to reflect truly the local SEND community. FVS leaders value the way their profile and engagement have been advanced through the local area's updated communications strategy, particularly the highly effective work of the lead officer. Of particular note is the increased dissemination of information, including about the local area's performance, through publications, websites and social media.

FVS leaders value the organisation's active involvement in the development of key policies and services since 2016. Parents and carers made meaningful contributions to the development of transport and short breaks arrangements, for example. The current evaluation of the revised approach to short breaks is hosted on the FVS website and under their management. Parents were at the heart of developing the Local Early Autism Programme, which recognises and supports the central role of parents and carers in the earliest interventions to ensure children's success. From the outset of the WSOA, family representatives have been engaged routinely in a range of clinical health reference groups. Such engagement has ensured, for example, that parents' views have been central to the development of a single health assessment template, being deployed at the heart of the EHC planning process.

The influence of young people's views has developed well since 2016. The membership of SEND Youth Advisors Surrey doubled in the last year, after the local area further promoted this opportunity for service users' views to be heard and acted upon. Two representative groups now meet monthly with service leaders and have produced advice and guidance for other young people with SEND, informed by their own knowledge and experiences. Representative group members have been involved

in the recruitment of senior local area leaders, including assessments and interviews. Child and adolescent mental health service (CAMHS) users are actively engaged in the development of services for young people. It was clear from the inspectors' meeting with a group of children and young people that there are established routes for CAMHS service users to make their views known, and that these are acted upon.

Cooperation between FVS and local area leaders has faltered at times. In 2017, FVS leaders did not endorse the local area's action plan fully, reflecting their strongly held view that consultation had not been sufficiently inclusive in all aspects. During 2018, a lapse in SEND partnership board meetings after February limited the influence of FVS, for example on developments in the identification of SEND at school support level and on the recent SEND transformation consultation, launched in October.

Since January 2019, shared evaluation and planning are now back on track through monthly SEND System Partnership Board meetings and regular face-to-face meetings between senior local area leaders and FVS. FVS expressed cautious optimism to inspectors about the recovering pace of engagement and improvement.

The local offer has been successfully redeveloped in close collaboration with FVS. The usefulness and accessibility of the service are much improved. The site is easier to navigate than previously and more comprehensive and coherent in its content. As a result, hits on the website increased from 5,000 to 12,000 annually between November 2016 and November 2018. The promotion of the local offer is well supported through social media and the refreshed communications strategy. Leaders recognise the need to ensure that all content, for example about staff training open to parents and carers, is kept fully up to date.

The required transition plan was completed successfully. Transfers from statements to EHC plans were overwhelmingly made on time, with a small number of complex plans completed after the required date, but still ahead of the new academic year.

The local area has made sufficient progress to improve this previous area of weakness.

**The inefficient management and coordination of area information, in administrative processes, to inform evaluation of services and outcomes, and to hold leaders and staff at all levels to account for rapid improvement.**

The local area has achieved a positive step-change in the availability, helpfulness and use of management information at all levels.

Leaders now use systematic analysis and review of complaints, and near-live analysis of tribunal information, to inform improvements. At the time of the inspection in 2016, such information was simply not available. Reliable information about the timeliness and quality of assessments and EHC plans is now routinely analysed. The

analysis format allows information to be considered and shared at appropriate levels of detail: from summaries amenable to the public domain or reports to elected members, through to identification of individual cases.

The analysis of SEND needs, across the local area, is now a well-established feature of forward planning including strategic consideration of special provision capacity and location. Health leaders routinely use outcomes of assessments and EHC plans to inform service planning and prioritise staff development. Access to health services is routinely audited, for example checking contacts with the one-stop single point of access for the helpfulness of onward referrals, and checking live feedback given on the usefulness of online health resources, to inform further developments. School leaders told inspectors that they valued area leaders' recent analysis of county-wide school exclusions information, supporting a more strongly collaborative approach.

Historic data drawn into management systems is checked for its reliability. When considering reports, leaders are sensibly alert to an identified anomaly between health and county information. Work is in hand to reconcile the information held, supporting leaders' firm plans for a single central record of children and young people with SEND.

Some significant gains have been made in using management information to inform staff development and performance management. However, inconsistencies remain in the service parents, carers and schools experience from the county's quadrants. A thoroughgoing review is under way, informed by the analysis of SEND needs and feedback from families, schools and staff. The proposed reorganisation of administrative structures, from April 2019, is intended to support a more reliable service and better staff experience. The systems and analysis now in place are well suited to monitor, support and evaluate the success of this project.

The local area has made sufficient progress to improve this previous area of weakness.

**The relatively low identification of need at school support level, indicating inefficiencies in the early identification of special educational needs and/or disabilities.**

The proportion of pupils identified as needing school support for their SEND has improved steadily since 2016. The last published information, in 2017, showed the proportion of pupils identified at SEND school support level had risen to align closely with the average recorded for statistical neighbours, and approaching the regional average. School leaders spoke enthusiastically to inspectors about the local area's prompt challenge to schools, in January 2017, about the identified issue. School leaders and SENCos valued the programme of workshops and training that ensued, and the funding agreement achieved. The impact on identification that followed is clear and was credited in the minister's letter of December 2017.

Between March 2018 and March 2019, more than 500 pupils were newly recognised as requiring school support, sustaining the previous improvement in identification.

In the summer term 2018, new local area leaders established an urgent priority to redouble efforts on this priority. Partnership work, including some school SENCOs and early years staff, resulted in the autumn term development of a 'Profile of Needs' document, supporting a graduated approach to identifying and meeting pupils' SEND, on a coherent continuum starting even before school support level. At the same time, partnership work to improve identification of children's SEND in the early years, and transfer of information on entry into school through a 'passport' approach, has been welcomed by early years providers and SENCOs.

The local area has made sufficient progress to improve this previous area of weakness.

### **The increasing rates of absence and exclusion experienced by children and young people with SEND in mainstream schools.**

Area leaders recognise that actions taken since the inspection to reduce absences have not had enough impact. Between 2016 and 2018, the proportion of mainstream pupils with an EHC plan missing more than 10% of school time rose from 20.1% to 21.5%. This increase occurred despite the updating of Surrey's attendance policy and guidance in 2017, including for medical absences, and adjustments to the work of education welfare officers to improve consistency of approach across quadrants.

During 2017, exclusions for pupils with SEND reduced to below published national figures. The local area's information shows that exclusions for pupils with SEND have continued on a consistent downward trend to March 2019. However, these positive exclusion figures link to a complex picture of school absence for pupils with SEND.

A strong theme in parents' and carers' feedback to inspectors, in the online survey and face to face, was about absences linked to SEND, including mental health concerns, sometimes for extended periods. These absences sometimes related to exclusion or avoiding the risk of exclusion. Parents and carers also described absences they considered linked to schools' difficulty in meeting their children's SEND. Some parents were unwilling to accept a school placement they considered inappropriate. School leaders commented on insufficient local area capacity to meet pupils' SEND through timely appropriate support or specialist provision. Parents described their frustration in these circumstances made worse by unreliable customer care, for example telephone calls and emails not returned or an absence of area-initiated contact during extended periods of their child's absence from school. Inspectors noted staff-survey feedback recognising parents' frustrations. Individual parents told inspectors about the lengths members of staff go to at times, for example calling after hours or during leave periods. A small number of parents were complimentary about the helpful support they and their children receive. Overall, though, parents and carers express dissatisfaction.



Leaders monitor the regular information now required from schools about absent pupils, and check with quadrant managers about how these cases are followed up. However, this strategy is not having a successful impact overall.

The local area has advanced plans in place to extend relevant specialist provision and support across the local area. Plans include the implementation of some aspects urgently, through interim measures. However, in the meantime, serious issues affecting the attendance of pupils with SEND remain unresolved.

The local area has not made sufficient progress to improve this previous area of weakness.

As leaders of the local area have not made sufficient progress against all of the weaknesses identified in the written statement, it is for the DfE and NHS England to decide the next steps. This may include the Secretary of State using his powers of intervention. Ofsted and CQC will not carry out any further revisits unless directed to do so by the Secretary of State.

Yours sincerely

<b>Ofsted</b>	<b>Care Quality Commission</b>
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