8 November 2019

Ms Janet Bailey
Director of Children’s Services, Bromley
Stockwell Close
Bromley
BR1 3UH

Angela Bahn Managing Director, Bromley Clinical Commissioning Group (CCG)
Debi Christie Head of Service: SEN, Local Area Nominated Officer

Dear Ms Bailey and Ms Bahn

Joint local area SEND inspection in Bromley

Between 16 and 20 September 2019, Ofsted and the Care Quality Commission (CQC), conducted a joint inspection of the local area of Bromley to judge the effectiveness of the area in implementing the disability and special educational needs reforms as set out in the Children and Families Act 2014.

The inspection was led by one of Her Majesty’s Inspectors from Ofsted, with a team of inspectors, including a children’s services inspector from the CQC.

Inspectors spoke with children and young people with special educational needs and/or disabilities (SEND), parents and carers, local authority and National Health Service (NHS) officers. They visited a range of providers and spoke to leaders, staff and governors about how they were implementing the special educational needs reforms. Inspectors looked at a range of information about the performance of the local area, including the local area’s self-evaluation. Inspectors met with leaders from the local area for health, social care and education. They reviewed performance data and evidence about the local offer and joint commissioning.

This letter outlines the findings from the inspection, including some areas of strengths and areas for further improvement.
Main Findings

- Selected as a ‘pathfinder’ and ‘pathfinder champion’, the local area was ambitious to demonstrate consistently strong progress towards putting the SEND reforms in place. However, having taken on the role of ‘pathfinder champion’, the local area went through a period of significant change and instability. As a result, progress towards the adoption of the reforms slowed and the local area missed key deadlines along the project timeline.

- In September 2017, leaders commissioned a comprehensive SEND review. Since then, they have worked steadily to implement the SEND reforms.

- Leaders ensure that the Children and Young People’s plan prioritises meeting the needs of vulnerable children and young people with SEND in the local area. Their evaluation of their work is accurate and comprehensive. It highlights strengths and areas for development.

- Leaders know the local area’s demography and geography. They are aware of the diverse needs of their communities. They deploy resources to those areas with the greatest need.

- Elected members of Bromley Council support leaders in prioritising improvements for children and young people with SEND. For example, the council has invested in high-needs funding and created new jobs for officers and healthcare professionals to strengthen operational delivery.

- The designated clinical officer contributes to improvements at a strategic and operational level. Her leadership and the strength of her partnership work make a positive difference to meeting the health needs of children and young people.

- Leaders contract a broad range of jointly commissioned services. These reflect their commitment to applying the principles of the SEND reforms to meet education, health and care needs.

- Jointly funded services enable children and young people with very complex needs to access good-quality provision without delay.

- The local offer and its website are not fit for purpose. Information on the website is often out of date or inaccurate. Services listed are not always available. Parents told us that they do not routinely make use of the website.

- Leaders have begun to instil a culture change that aims to make sure that parents are included fully in decisions about their children. However, not all parents recognise this change. Some parents feel that their children’s needs are not identified and met effectively.

- Education, health and care (EHC) plans do not routinely tell the whole story of the child or young person and they are not always provided on time.

The effectiveness of the local area in identifying children and young
people’s special educational needs and/or disabilities

Strengths

- Leaders ensure that the needs of children and young people with SEND are identified at an early opportunity. In general, parents agree that this is the case.

- Leaders make sure that systems are in place to identify the needs of the most vulnerable children and young people. This includes those who are looked after, designated as children in need, electively home-educated and those known to officers in the youth offending service (YOS).

- Leaders identify the needs of individuals or groups who are brought to their attention. For example, feedback from midwives to the family nurse partnership has led to improved parenting support for new mothers under the age of 25 with SEND.

- Everyone who supports children and young people works together effectively to identify needs. Leaders ensure that children and young people identified by means of the common assessment framework are directed to services that will meet their needs. Effective collaboration between the YOS and the health support for school service (HSSS) has improved the quality of support and advice for young people known to the YOS.

- Children under five with possible autism spectrum disorder receive a coordinated multi-disciplinary assessment. This ensures that families are offered support in a timely and coordinated way.

- The local area’s open referral system generally supports early identification well. For example, parents of very young children who are worried about their child’s speech can ask for advice and support from the speech and language therapy team as part of the universal health service offer.

- Where possible, children and their families access therapies and health assessments close to where they live. Parents appreciate the work of children and family centres. Children and family centres are developing as hubs of good practice in the early identification and assessment of need.

- Education providers communicate effectively with the local area. Children and young people benefit from prompt identification of their needs when they start at school or college.

Areas for development

- There are many systems and processes in place for sharing information about children and young people with SEND. Overall, there is a lack of coherence in the systems and, therefore, a risk of delay in identifying the specific needs of
children and young people with SEND.

- Leaders have not ensured that parents are confident that their children’s needs are identified accurately and in a timely way. This is particularly, but not exclusively, the case for parents whose children may have dyslexia.
- There are currently staff shortages in the health visiting service. Not all new families are benefiting from antenatal visits. This means that children with SEND may not be identified at the earliest possible stage.

The effectiveness of the local area in meeting the needs of children and young people with special educational needs and/or disabilities

Strengths

- Most children and young people with SEND in the local area attend a setting, school or college that is rated good or outstanding by Ofsted. Education providers in the local area are typically inclusive and committed to meeting a broad range of needs. Parents told inspectors that they find settings, schools and colleges welcoming.
- Leaders ensure that jointly commissioned services meet the needs of children and young people with SEND particularly well. Leaders are committed to ensuring that there is a broad range of jointly commissioned services. Leaders check the quality and impact of these services. They make changes where they are needed to secure improvement.
- Leaders have a very clear understanding of the needs of different vulnerable groups. They expect all providers and partners to work together to meet needs. Children who are electively home-educated benefit from support from the HSSS. Young people known to the YOS benefit from a speech and language assessment and plan of care.
- Leaders promote joint working between Bromley Y (Bromley’s early intervention service for emotional well-being) and the child and adolescent mental health service (CAMHS). This supports swift needs assessments for children and young people referred to the respective services.
- Leaders recognise that some young adults with social, emotional and mental health needs may not meet the criteria for adult services but continue to need support. They make sure that there is a flexible and responsive service for these young people up to the age of 21.
- The local area is improving the way that assessment results are shared between professionals across health and the local authority. This reduces the need for parents to go through the details of their child’s history more than once. Children who are looked after benefit from joint reviews of their EHC and personal education plans. Community paediatric nurses and paediatric
continuing care nurses coordinate the care for children with complex needs.

- The local area works well with education and service providers outside of the borough. The headteacher of the virtual school maintains regular contact with all providers, including those beyond the expected 20-mile radius. Nurses for children looked after visit children placed outside the local area and carry out their health assessments. This contributes well to the provision made for children looked after who are placed outside the local area. Leaders maintain strong oversight of children and young people who are educated and cared for in residential special schools outside the borough.

- There are some creative examples of co-production (a way of working where children and young people, families and those who provide services work together to create a decision or a service which works for them all). These include the Bromley Y and CAMHS services, and the autism partnership working group. Young people spoke positively about their involvement in these and other initiatives.

- Leaders have been swift to respond to increased demand. Leaders have appointed additional officers and health professionals. The local area has succeeded in winning funding for a new special free school. All these actions, together with the expansion of post-16 and alternative education, demonstrate leaders’ determination to meet the needs of children and young people.

- The local area is sensitive to the specific needs of different communities. Leaders adopt a partnership approach to identifying, assessing and meeting needs. Through partnership work with Traveller communities, leaders are improving educational and health outcomes.

- Children and young people are effectively supported when they transfer from one provider to another. Professionals work together to ensure that education, care and health needs continue to be met. Young people who attend London South East College have access to a multi-disciplinary team of health professionals who are based on site. This personalised care supports them when they start at the college and throughout their ongoing education.

- Leaders ensure that a very broad range of training is available for professionals and parents. This has a positive impact on the local area’s ability to identify, assess and meet needs. Strong partnerships with training providers, including the teaching school collaborative and representatives from local voluntary organisations, contribute to the varied and relevant training offer.

- The special educational needs coordinators’ (SENCo) network provides training and information sharing for school-based SENCos. However, leaders do not make routine use of peer support and challenge within this network to share good practice further.
Leaders encourage innovation and sector-led development. Recent initiatives include the appointment of an ‘autism champion’ in each school and assessment of the quality of early support for pupils with SEND in schools.

Areas for development

- By March 2018, 17 statements of special educational needs had not been converted to EHC plans. This was for a number of reasons, including planning for very complex needs and requests from parents for further information and/or extensions. By September 2018, there were five outstanding and there were none by May of this year.
- Most EHC plans that have been produced do not set out the expected educational, health and care outcomes for each child or young person clearly enough. Too few meet the statutory 20-week timescale.
- Bromley Parent Voice is underused. Leaders do not ensure that parents have an opportunity to express their views on the further development of services for children and young people with SEND.
- The local offer includes information about activities, opportunities and services for children and young people with SEND but much of the information is out of date. The website is not well used.
- Parents are frustrated by the occupational therapy commissioned service. It does not meet the needs of children and young people in a timely way.
- Partly due to raised demand, the local area has not fulfilled its ambition to increase the availability of care and education that are close to the homes of children and young people with SEND.
- Health checks are not coordinated for children at age two-and-a-half years. This means that leaders miss an important opportunity to join up plans for children’s health and care.
- Waiting times are too long for children of school age who need assessment for autism spectrum disorder.

The effectiveness of the local area in improving outcomes for children and young people with special educational needs and/or disabilities
Strengths

- Since the reforms were introduced, educational achievements have improved for children and young people with SEND.
- Outcomes for children and young people who receive SEND support are improving due to the quality of plans and provision.
- Where mainstream and specialist provisions are located on the same site, this arrangement supports children and young people to achieve well.
- Most children under the age of five attend effective early years provision with good access to advice and support from early years education professionals and therapists. This leads to strong outcomes for children with SEND.
- The number of young people who stay on in education, employment or training is increasing. The local area ensures that young people receive well-timed advice about their options for the future. Providers actively seek assisted employment and supported internships to help young people enter the world of work. These opportunities extend to young people with very complex needs. Young people told inspectors that their work experience and current courses are well suited to their interests and ambitions. They spoke positively about the care and support they receive to help them in their learning.
- Leaders have an increasingly clear measure of the health outcomes for children and young people with SEND. Leaders are keen to develop this further.
- General practitioners (GPs), supported by the CCG, identify and offer annual health checks to young people aged 14 years and above with SEND. Leaders have engaged with and provided training for GPs, which has increased uptake of these assessments.
- Leaders have secured improvements in the quality of social care. This has increased awareness of the needs of children and young people with SEND and their outcomes.
- The local area’s short breaks arrangements support children, young people and their families effectively. Short breaks provide high-quality care and nurture relationships.

Areas for improvement

- The rate of permanent and fixed-term exclusions is reducing. However, there
are still too many instances where children and young people with SEND are excluded from education.

- The proportion of children and young people with SEND who often miss school had declined over recent years but is now rising again. Greater scrutiny helps leaders to understand the factors that affect attendance. Leaders have put systems and processes in place that are beginning to address this.

Yours sincerely

Jane Moon
**Her Majesty’s Inspector**

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Cc: Department for Education
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    Director Public Health for Bromley
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    NHS England