

Hammersmith & Fulham Council

**Appendix 3 - SEND
Sufficiency Review**

Contents

Our approach	4
Our shared vision for SEND	5
Voice of Stakeholders	7
H&F Sufficiency Local Context	9
Locations where H&F EHCP pupils are educated	10
Needs Analysis	14
SEND Travel Support.....	29
SEND Sufficiency Review 2022-2027	31
Final General Recommendations	31
Consolidated Recommendations	32
Glossary	34

Introduction

We are ambitious for our children, young people, and families with special educational needs and disabilities (SEND). This review represents our commitment to ensuring there is sufficient high quality, local provision to meet needs. The recommendations of this review reflect our early identification and intervention approach to meeting the range of needs in the borough at the right place and at the right time.

The SEND sufficiency review is a key document to enable the delivery of our vision for children and young people across Hammersmith and Fulham. Our ambition is to work together to support children, young people, and their families at the earliest opportunity from universal services through to targeted and specialist support where necessary. It is imperative for this approach to review provision to ensure equity and that it aligns to the graduated approach of early intervention and inclusion; reshaping the way in which we plan, implement, and deliver services in Hammersmith & Fulham.

This review has been coproduced with families, involving all partner agencies in Hammersmith and Fulham who have responsibilities for commissioning and providing services for children and young people with SEND including local authority services, education settings, health providers and the voluntary and community sector.

The SEND Sufficiency Review draws on the local area priorities of our SEND Strategy to transform outcomes for children and young people in Hammersmith & Fulham from pre-birth to 25 years old. To support our SEND population to ensure they achieve the best possible outcomes, we must take a holistic approach to provision, ensuring we work together as a whole system, to make certain there is greater consistency to how needs are met and supported.

Through implementing the recommendations of this review, we will work with our early years, school, and post 16 partners to ensure all children, regardless of their background, have the same pathway of opportunities available to them. The recommendations are vital to delivering our early intervention programme to ensure children with SEND have every opportunity reach their full potential.

Our approach

As part of our ongoing work to transform local services and more effectively deploy high needs funding to meet needs, the Council commissioned a review of the long-term designation of provision to ensure it is sufficient to meet current and future needs in the context of our early identification and intervention approach. The analysis of the data and subsequent recommendations from this review will inform future place planning for our 0-25 years learners to address current gaps and challenges in the system.

To support children and young people to achieve, we recognise we must take a holistic approach to tackling barriers to their success including reviewing the range of provision available in the local area. The review was structured into three key stages:

1. To understand the current landscape of provision for children and young people, acknowledging any existing fragmentation and complexity, and move forward collaboratively to improve and maximise the offer
2. To gather feedback from stakeholders to test assumptions via structured thematic discussions
3. To coproduce a range of recommendations that seek to ensure provision is aligned to needs of children and young people in the borough.

The review was undertaken in the context of the Governments SEND Review which was published in March 2022, SEND Review: Right support, right place, right time which concluded that there is a need for much greater consistency in how needs are identified and supported, so decisions are made based on a child or young person's needs in coproduction with families, not where they live or the setting they attend.

This review builds on the work we are undertaking across the Hammersmith & Fulham local area to strengthen our early intervention approach, working in jointly with education partners to bring together resources and expertise to better coordinate and meet special educational needs.

To implement our vision, we will adopt a whole system approach across the local area. Everyone in a child or young person's life has an important role to play in identifying and supporting their needs. Parents, carers, class teachers and school professionals who form part of a child's daily routines and experiences know and understand the child best and are best placed to be able to make a real difference to support development and invoke positive changes. Adopting a whole system approach aims to draw the knowledge and support of specialist and targeted services into the mainstream environment to support and develop the confidence in universal services by ensuring early intervention is everyone's business and to increase inclusive practice so that children with special needs and disabilities can attend their local setting/school in line with theirs and their parents' wishes. A number of our existing strategies and partnership working arrangements, including our Early Intervention Strategy, already take on this approach, demonstrating our clear shared vision.

Our shared vision for SEND

Ambitions for children and young people in H&F are high and embedded through a golden thread of inclusion. H&F in turn has strong manifesto pledge commitments for the 0-25 years SEND population.

The Health and Care Partnership is committed to the vision of ensuring children and young people lead happy, healthy, and fulfilling lives and achieve their life goals.

Underpinning our SEND vision is a set of jointly agreed principles. We want Hammersmith and Fulham to be a place where all children and young people with SEND and their families:

- Feel welcomed, included, and valued.
- Have a voice, are listened to and are equal partners in decision-making about their own lives.
- Have their needs identified early and accurately, with effective support put in place quickly.
- Benefit from joined up support from staff who have the right knowledge and skills.
- Have access to high-quality education locally.
- Are clear about what they can ordinarily expect from their local services and education setting.
- Have high aspirations for their future with a clear focus on life outcomes across education, health, and care.
- Have access to the right information at the right time.

H&F local area partnership has identified the following priorities:

- Robust identification, assessment and early intervention of children and young people's needs
- Development of sufficient inclusive and effective local provision
- Successful preparation for adulthood including person-centred pathways through education, health, and care.

Underpinning these priorities is our commitment to:

- Strengthening our outcomes-focussed quality assurance framework.
- Continuing to embed co-production as our way of working.
- A system wide approach at all levels in which SEND is everyone's business.
- Multi-agency workforce development.

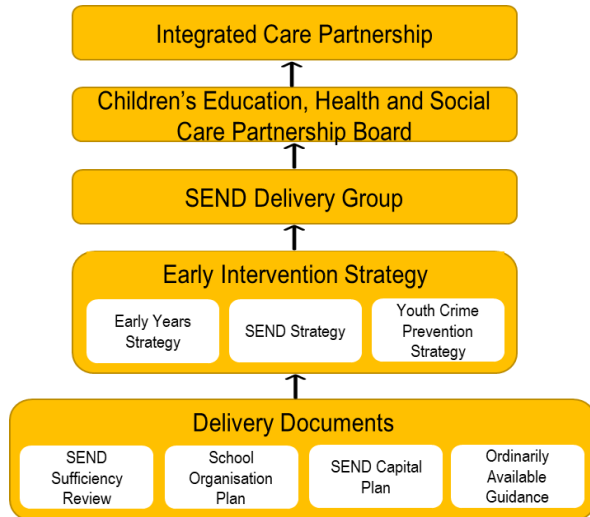
The H&F local area SEND vision and principles incorporates a *whole system* graduated approach that focuses on all children, young people, and their families.

This review forms represents a key delivery strand against the identified priorities and should be read in conjunction with the following key documents which give further detail to specific areas of focus across our delivery:

- SEND Strategy
- Early Intervention Strategy

- Early Years Strategy
- School Organisation Plan
- School Capital Plan

Continued monitoring of the delivery of the recommendations will be overseen by the Children’s Education, Health, and Social Care Board.



Voice of Stakeholders

Our vision for coproduction is that it becomes the way of working in our local area, transforms culture and practice and delivers positive life outcomes. We have used an active and flexible approach to coproduction in this review informed and shaped by professionals, families, and carers to reflect the diversity of our local population.

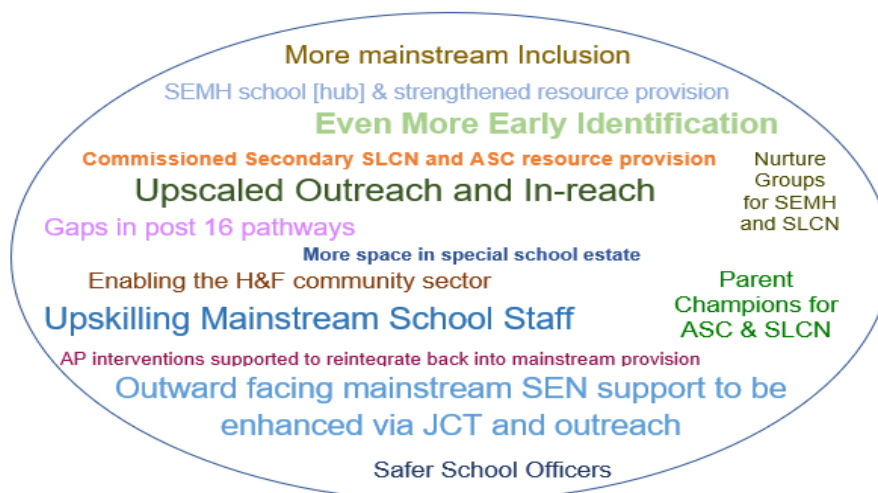
This review has been undertaken jointly with our partners across the local area. A Reference Group was established with representation across H&F Council, the Integrated Care Board and school partners to share knowledge and expertise, support developing key lines of enquiry with the commissioned provider undertaking the review and to review and test assumptions.

Subsequently a series of thematic discussions were held during the Summer which included representation from across the Council, the Integrated Care Board, Health providers and parents and carer forum members (ParentsActive) to understand the current challenges of provision, consider future projections and potential solutions to challenges and scope recommendations for provision in line with H&F's inclusion agenda and the direction of travel in relation to the SEND Review Green Paper and Schools White Paper.

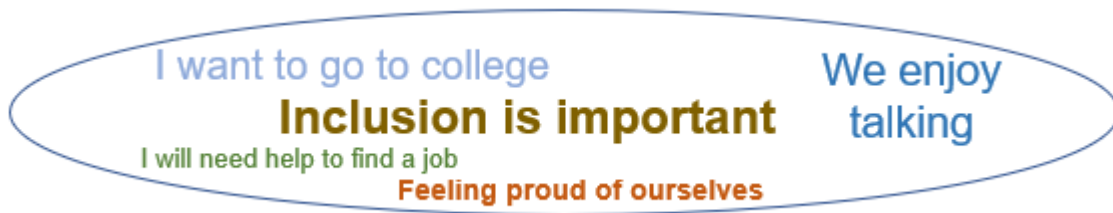
Throughout the review we have utilised existing feedback from children and young people gathered through our Coproduction Lead and Youth Voice Coordinator.

The thematic workshops, surveys, meetings, and individual interviews have all shaped the local context, needs analysis and recommendations detailed throughout this review.

The word cloud below presents the themes that were fed back as an outcome of co-produced engagement in summer 2022 as part of the research to inform this review.



Feedback from young people with SEND included:



H&F Sufficiency Local Context

Hammersmith & Fulham (H&F) is the country's eighth most densely populated local authority. It is twice as densely populated as London as a whole. In general, the borough's central and southern areas are more densely populated than the northern area, although densities vary greatly between individual wards. The age profile of H&F continues to be typical of a young, diverse, and mobile urban population.

From a SEND perspective, at summer 2022, the total number of children with Education, Health and Care Plans (EHCPs) resident in H&F was 1,312. H&F has seen a consistent rising trend in EHCP numbers in recent years, broadly reflecting the national trend. The proportion of pupils in maintained schools with an EHCP is above the national average but the differences are less significant when considered as a proportion of the borough's population. In comparison, the incidence of SEN Support has seen a broadly flat trend locally and nationally, however H&F does sit below the national average.

The two largest primary need groups for EHCPs are Autism Spectrum Condition (ASC) and Speech, Language and Communication Needs (SLCN), which together account for almost two thirds of EHCPs in H&F: In addition:

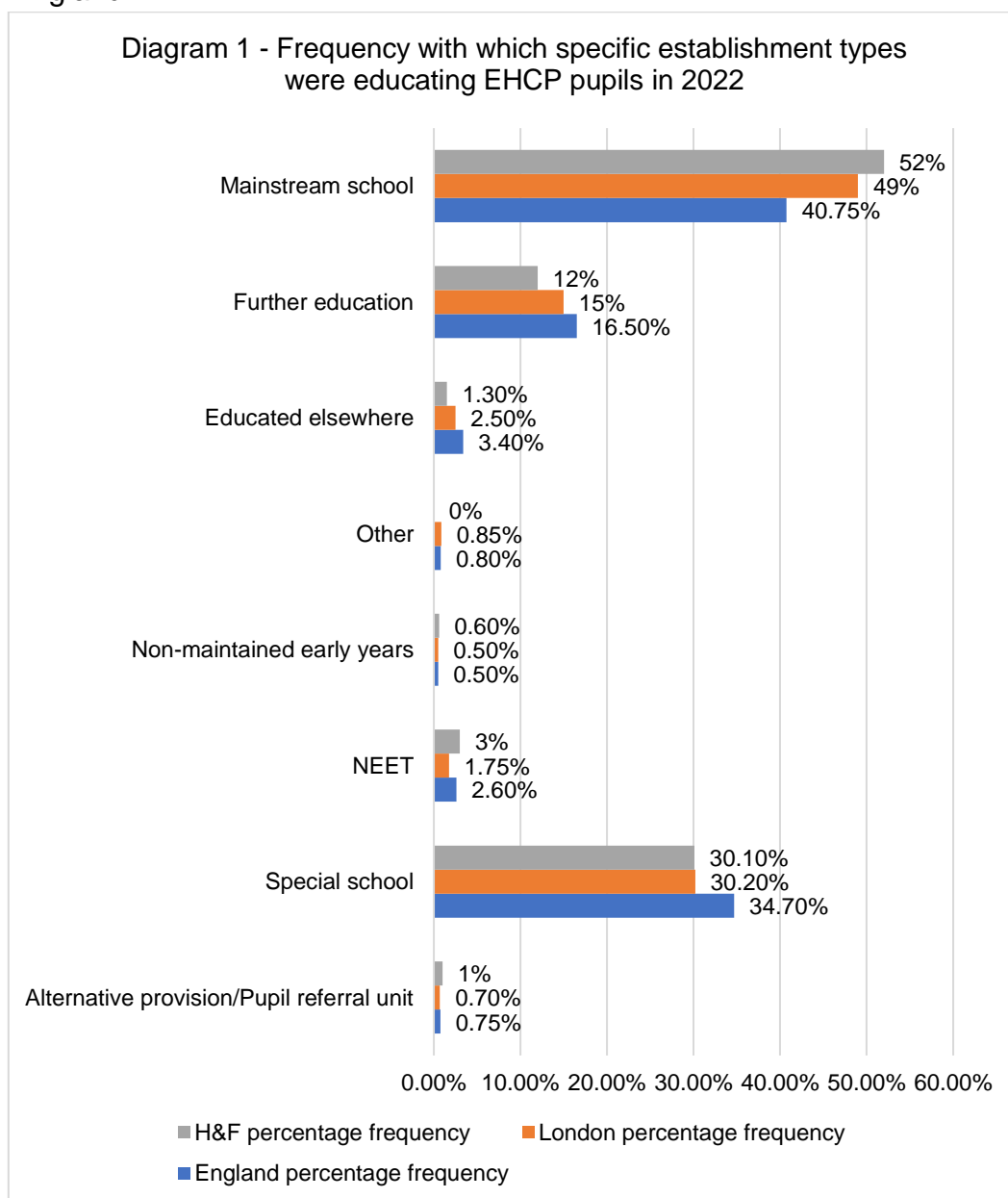
- Since 2018-2019, the proportion of the EHCP cohort in the ASC and SLCN groups has been broadly steady
- SEMH has seen a strong rising trend in recent years which, if this continues, would lead to a projected 82% increase in EHCPs with a primary need of SEMH by 2030
- There have been declines in the proportion of the EHCP cohort with MLD, SLD and SPLD – together with some of the smaller primary need groups
- Some of the smaller primary need groups have seen relatively large percentage changes (e.g., Hearing Impairment)

The Council is progressing ambitious reforms that have seen substantial investment into SEND services to promote the local area priority of early and accurate identification and intervention. This has seen a range of SEND Support services developed to improve access and ensure children and young people receive support at the right time. As a result, the long-term designation of provision needs to be reviewed to ensure it is sufficient to meet current and future needs, in the context of demonstrating suitable and efficient use of resources whilst preventing needs from escalating unnecessarily to statutory and specialist provision. It is important therefore that future place planning development for our 0-25 years learners with SEND accounts for potential demographic changes rather than simply seeking to address current gaps and challenges.

Locations where H&F EHCP pupils are educated

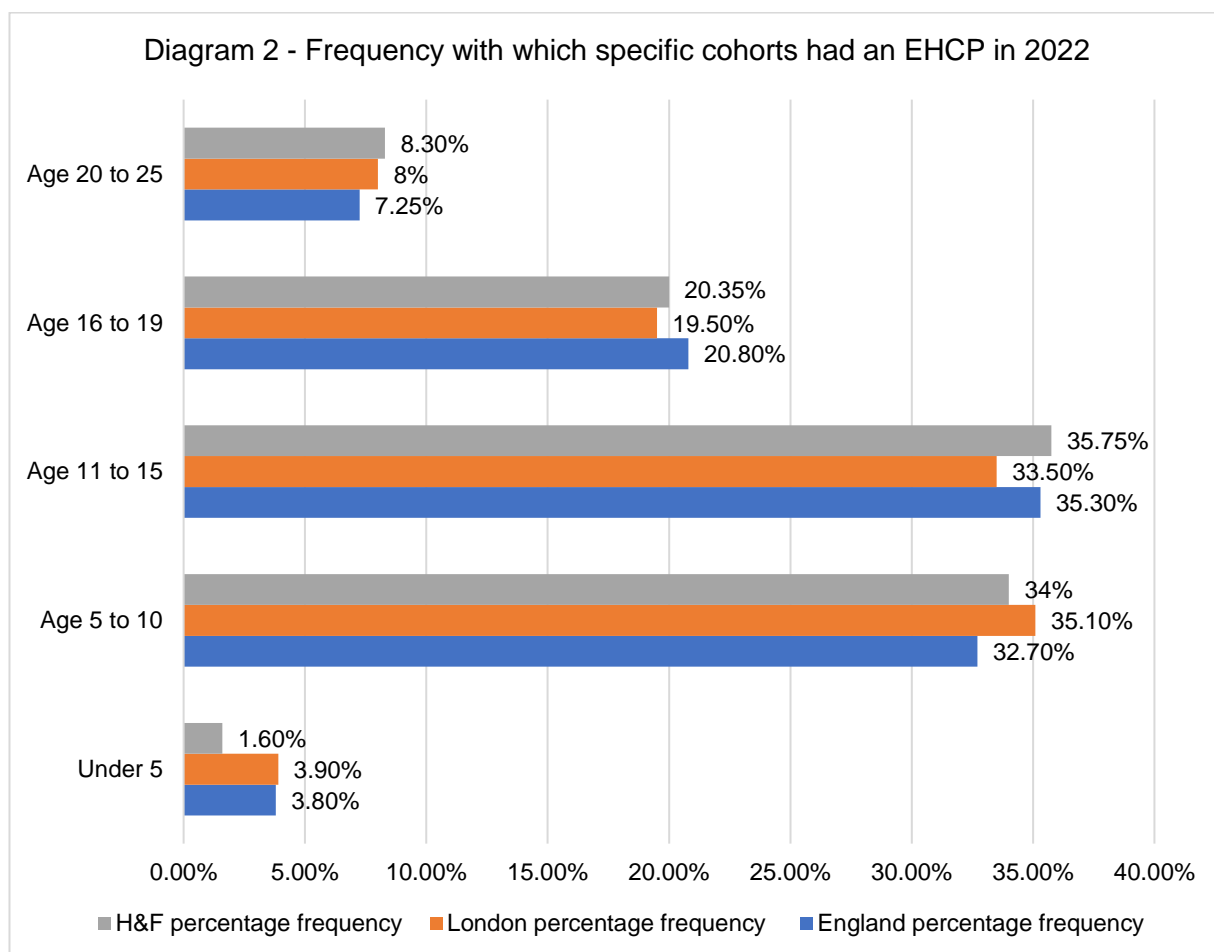
In making placement decisions, the local authority is required to give due regard to parental preference when naming a setting, as such this can result in placements outside of the local area and in some cases in the independent sector.

Diagram 1 shows where H&F resident pupils with EHCP's are educated in 2022¹ as a percentage of the total EHCP cohort compared with both the London region and England.



¹ Source: DfE SEN2 data.

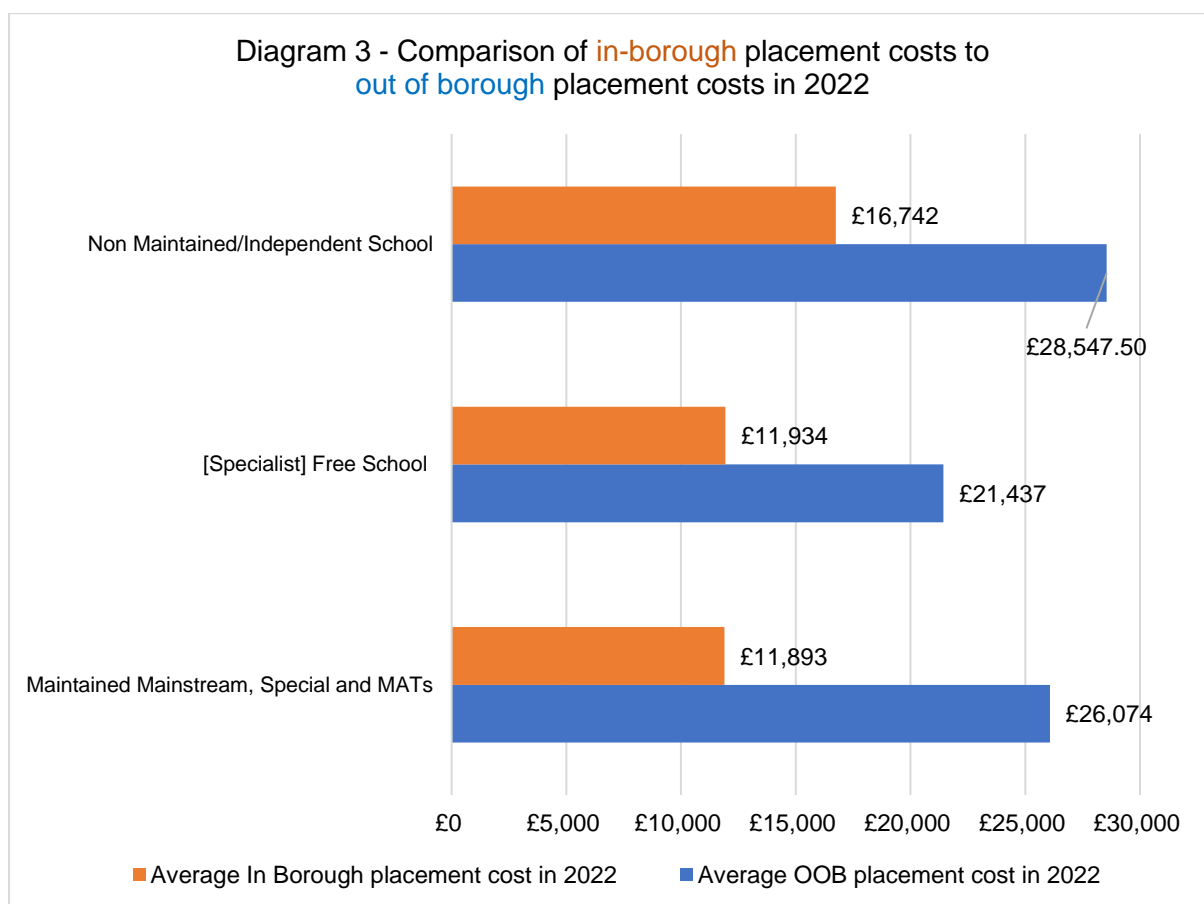
Additionally, diagram 2 indicates the age profile of children and pupils with an EHCP maintained by H&F as a percentage of the total cohort. In 2022, 11–15-year-olds and 20–25-year-olds in H&F accounted for a higher number of EHCPs compared to London.



In borough / out of borough unit cost comparison



At summer 2022, 280 resident H&F pupils with EHCPs (20%) were educated outside of the local area at a total cost of approximately £8.5million. This was compared to total in borough cost of approximately £6 million. Frequently these out of borough placements are expensive. Diagram 3, shows the H&F 2022 average annual cost by placement type of out of borough placements compared to in-borough placements. For example:

- The average cost of an **out of borough** EHCP placement for a H&F resident with an EHCP in 2022 at an independent/non maintained school is £28,547 – and this compares to a 2022 **in-borough** H&F resident average placement cost of £16,742.
- Additionally, the average cost of an **out of borough** EHCP placement for a H&F resident in 2022 at a mainstream/state setting is £21,437 – and this compares to a 2022 **in-borough** H&F resident average placement cost of £11,934.



Finally, both images below show where EHCP and SEN support pupils are educated within H&F via both the maintained state and independent sector.

H&F commissioned 0-25 years SEND landscape

4 maintained nursery schools	36 primary schools	11 Secondary schools
 <p>4 Post 16 Q+ - 16-25 ASC William Morris 6th Form – 16-19 SpLD / SEMH / SI Ealing, Hammersmith and West London College – 16-99 SLD / MLD / ASC / SpLD</p>		
<p>4 special schools</p> Jack Tizard – 2-19 SLD / PMLD Queensmill – 3-12 ASC Cambridge – 11-16 MLD / SLD / SEMH / SLCN Woodlane – 11-16 MLD, ASC, SLCN	<p>2 resourced provision</p> Queens Manor – 3-11 MLD Miles Coverdale – 3-11 SLCN	<p>1 AP establishment</p> OAT – 5-16 SEMH The Bridge Academy – secondary cohort The Courtyard – primary cohort
<p>3 Hybrid Special School Satellite provisions</p> Via Queensmill		<p>1 Community Sector</p> The Stephen Wiltshire Centre

H&F's non-commissioned and independent provision for 0-25 years with SEND

Westside School

Alternative Provision secondary school based in Hammersmith educating up to 60 students aged 11-16 years

Burlington House School

A co-educational day school for secondary age children and a sixth form, education children with special learning difficulties such as dyslexia, dyspraxia, ADD and other related learning difficulties

Parayhouse School

Accepts students between Year 3 and Year 11 who have speech, language and communication needs as a primary diagnosis

TLG West London

Independent school that for students aged 11-16 with Social, Emotional and Mental Health needs.

Needs Analysis

Impact of COVID-19 Pandemic

Whilst there was a strong partnership response to the Covid-19 pandemic locally, the impact on children and young people with SEND is continuing to emerge. We know from national research, *Ofsted – SEND: old issues, new issues, next steps June 2021*, that the lost months of education, the narrowing of access to services and community resources, and the financial and emotional impact on families has had a disproportionate impact on disabled children and those with SEN and their families. Local feedback resonates with this and is informing our priorities.

Social Emotional and Mental Health (SEMH)

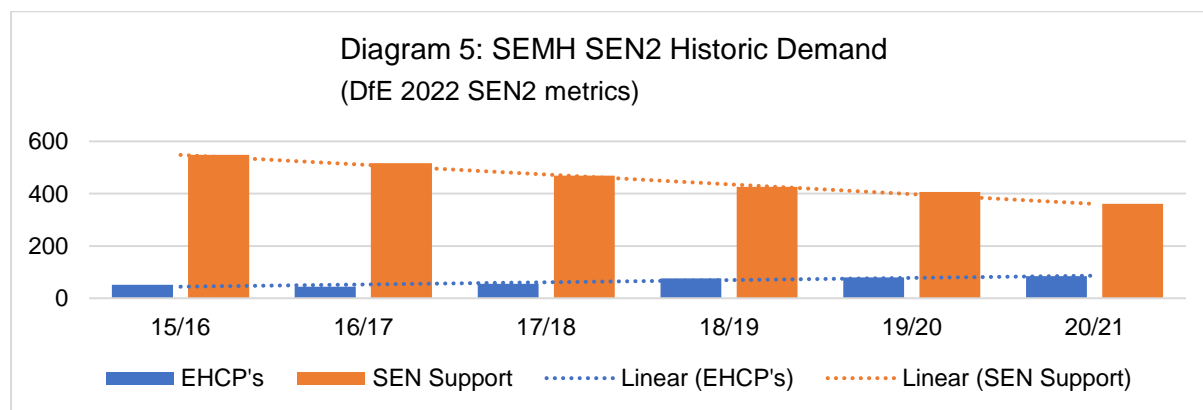
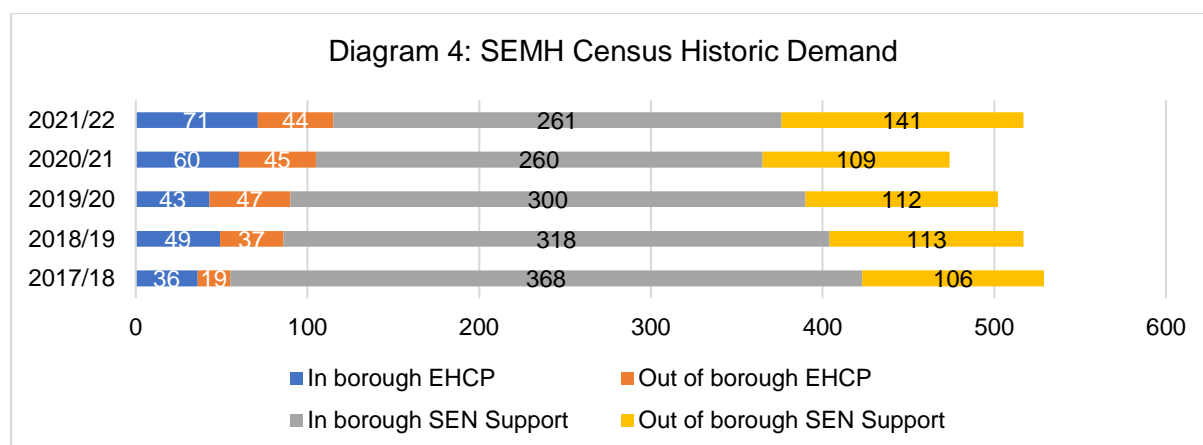
Feedback from stakeholders and the analysis of local data demonstrates the increasing presentation of Social Emotional and Mental Health needs in the borough. Whilst this is not unique to Hammersmith and Fulham and is reflective of a regional and national trend, the gap in local resourced and specialist provision results in needs being met in high-cost independent sector placements or our local Alternative Provision provider.

The local authority provides a range of universal and targeted services which aim to support meeting needs as part of our graduated approach. Universal services include the Trailblazer Mental Health Support Teams who have been trained to provide targeted interventions in schools for young people presenting with anxiety or early signs of trauma. The H&F 'Be Kind to your mind' programme commissioned by some secondary schools is also now well embedded alongside our traded Education Psychology offer, which delivers school workforce development and guidance as well as psychological support to young people and staff.

As part of our targeted offer, we also provide the Kooth service which is an online text-based counselling service for adolescents delivered via an app as well as our Parenting and Psychotherapy Service and our Positive Behaviour Support Team which is a joint-commissioned multi-disciplinary behavioural support service for children and young people with Learning Disabilities and/or Autism who are at risk of Tier 4 hospital admission or residential placement. The Local Authority also commission SEMH Outreach Support from Ormiston Academies Trust to provide targeted support to settings, children and young people to meet needs earlier and reduce escalation. Work is currently taking place with school partners and Ormiston Academy to remodel the current offer. The intended aim of the new offer is to provide schools with greater control and influence to enable them to better meet emerging needs and reduce escalation to specialist provision.

Analysis of Census data² detailed in diagram 4, indicates an increasing trend of resident pupils attending H&F schools where SEMH is the primary need. There is however a decreasing trend in resident pupils with SEMH at SEN support. These trends demonstrate the increasing level of need in the borough which is similarly replicated in the SEN2 analysis (diagram 5).

Out of borough pupils attending H&F schools shows a downward trend in the last three years however these are very small numbers. Nevertheless, this is likely as a result of other London Boroughs having developed their own local solutions to this regional trend including the creation of their own local specialist placements, which has in turn reduced reliance on the limited H&F provision.



SEN2 analysis³ for 2020-2021 shows the proportion of pupils with SEMH as their primary need that were being educated in state primary schools and secondary schools was 62%. This is in line with comparisons across London where there is an average of 63%. The data also identifies that H&F also places a number of pupils with SEMH within high-cost independent educational settings due to the lack of local sufficient provision.

The number of SEMH pupils that were being educated within an Alternative

² School Census data reflects both resident and non-resident pupils attending schools in H&F. This data presented relates only to LA maintained primary, secondary and special schools, as well as primary and secondary academy and free school settings in H&F. The exclusion of AP census data in this dataset means the output does not fully align with the total number of EHCPs in the baseline model numbers used in the projections.

³ Included to capture children resident in H&F with an EHCP, including those who may be attending provision out of borough.

Provision was 8% higher (at 12%) than the London average of 4%. The analysis of this cohort demonstrates the absence of a specialist SEMH provider in the borough, with needs currently being met by Ormiston Academies Trust, with use of the independent sector for more complex SEMH needs. Cambridge Special School also meet some specialist SEMH needs locally, however they do not have a GCSE pathway.

In terms of forthcoming requirements, diagram 6⁴ details the forecasted range of children and young people with an EHCP in H&F schools where SEMH is the primary identified need for the period 2023-2030.

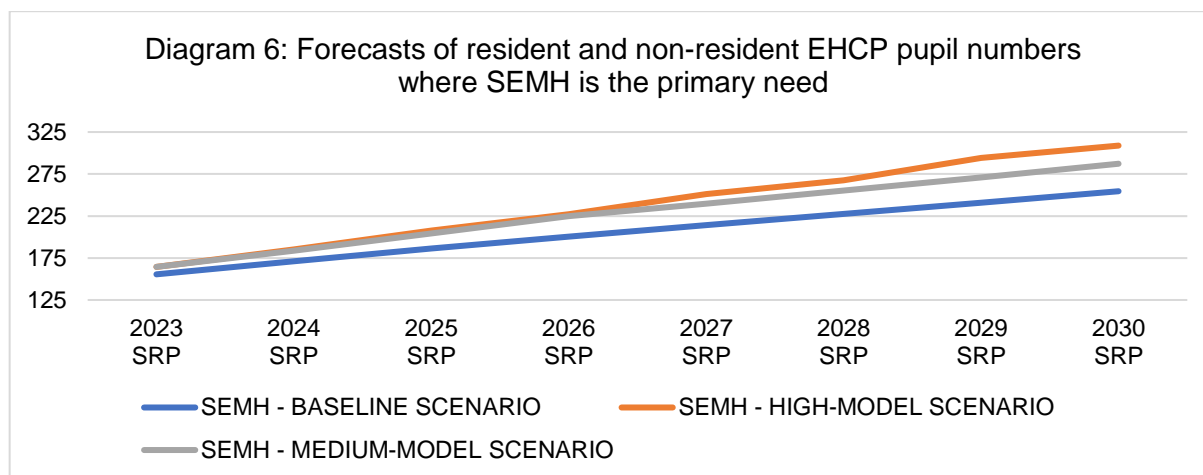


Diagram 6 indicates that across a mid-model scenario and the high-model scenario an average increase can be observed of 164 SEMH pupils with EHCPs in 2023 – rising to an average number of 298 SEMH pupils with EHCPs in 2030 (a notable increase of 82%).

Finally, an observation can be made comparing annual out of borough spend (OOB) with annual in-borough spend: the cost of educating SEMH EHCP pupils at independent/non-mainstream settings, in 2022, OOB is approximately £850,000 – compared to an in-borough independent/non-mainstream spend of approximately £230,000.

⁴ Forecasts of **potential EHCP(s) demand** based on the following source data⁴: Actual pupil numbers – by combining Alternative Provision Census (APC) and a subset of pupils with an EHCP from the January pupil census return

- ONS population projections
- GLA school roll projections

These figures are then used to plot three scenarios (see below) for change by primary need. These three scenarios are:

1. Baseline Scenario

This 'status-quo'-type scenario/model uses the 2022 actual proportions of EHCP SEND type on roll at maintained and non-maintained H&F educational settings. The scenario cohort is made up of pupils (residents and non-residents) recorded as having an EHCP in the January 2022 Census return and the SEND Alternative Provision return. Essentially, the baseline model is used as a starting point for a calculation of both high and mid-range models, rather than being considered a realistic scenario in itself, and applies the **assumption that the percentage of children and young people with SEND remains static over time.**

2. High-range model Scenario

This scenario/model projects forward the three-year trend (2020, 2021 and 2022) in total EHCPs, adjusted by an underlying population change and an aligned respective change in SEND (type) populations.

3. Mid-range model Scenario

This scenario assumes a **progressive reduction** due to policy and/or practice interventions in the trend rate of increase of EHCPs over the following five year-period:

Recommendations

1. That H&F create specialist SEMH provision for primary and secondary aged pupils.
2. That H&F remodel and strengthen the SEMH outreach provision to support a graduated approach, to meet the needs of pupil in their local mainstream school.
3. The Learning Partnership to include SEMH training for H&F settings as part of the ongoing CPD programme to support school partners to better identify and meet SEMH needs.

Autism Spectrum Condition (ASC)

The Local Authority has recently invested in becoming an Autism Education Trust training provider. This workforce development programme formulates a key part of the Council's Local Offer in building capacity within settings to further embed the social model of inclusion and a neuro-divergent approach. The programme provides a range of nationally accredited training modules for staff working in education settings in understanding and supporting presenting needs and supporting good autism practice as part of their ordinarily available offer.

There are national challenges in completing autism assessments in a timely way. In H&F, as of November 2022, 169 children under the age of 5 have been waiting 125.1 weeks for their first appointment and 163 children over the age of 5 have been waiting 81.7 weeks. In response to this challenge, fixed term funding from NHSE has been provided and includes key working support focused on the early year's diagnostic waiting list. The impact of this programme will be monitored by H&F to examine emerging impact and early intervention outcomes.

Woodlane High School and Queensmill School are the primary specialist education settings that support pupils with ASC in H&F. Queensmill School also host several satellite sites within mainstream schools in the borough.

Analysis of census data detailed in diagram 7 indicates an increasing trend in resident pupils with an EHCP where ASC is the primary need, albeit levelled in 2021-2022 compared to the previous year. Resident ASC pupils with SEN Support have similarly increased annually excluding a drop in 2020-2021. Out of borough pupils with an EHCP had been increasing on average by 5% per annum to 2020-2021, however there was a significant decrease in 2021-2022 reducing the four-year average to -1%, which was, in all likelihood, attributable to placing local authorities developing local provision.

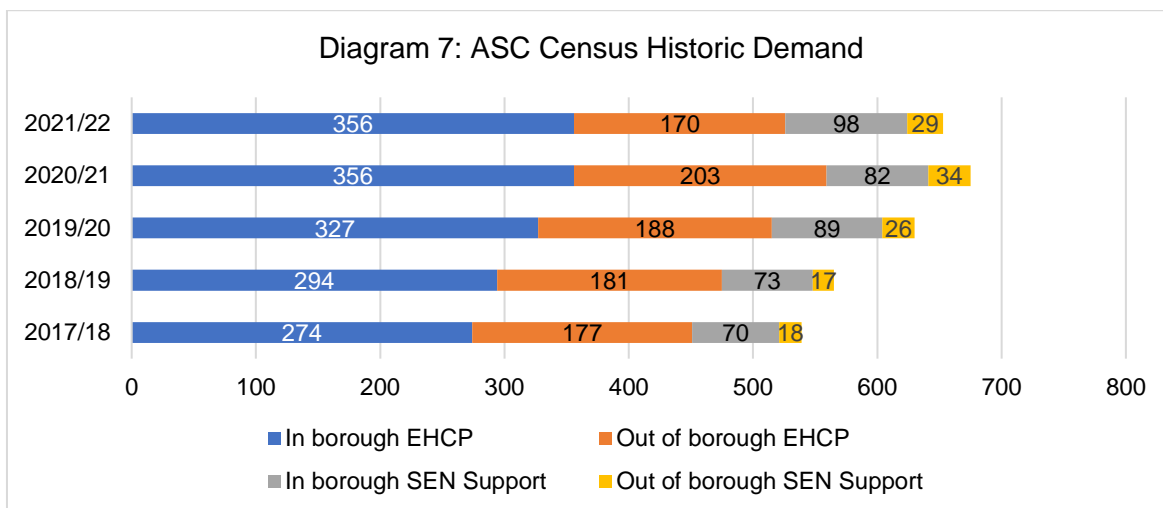
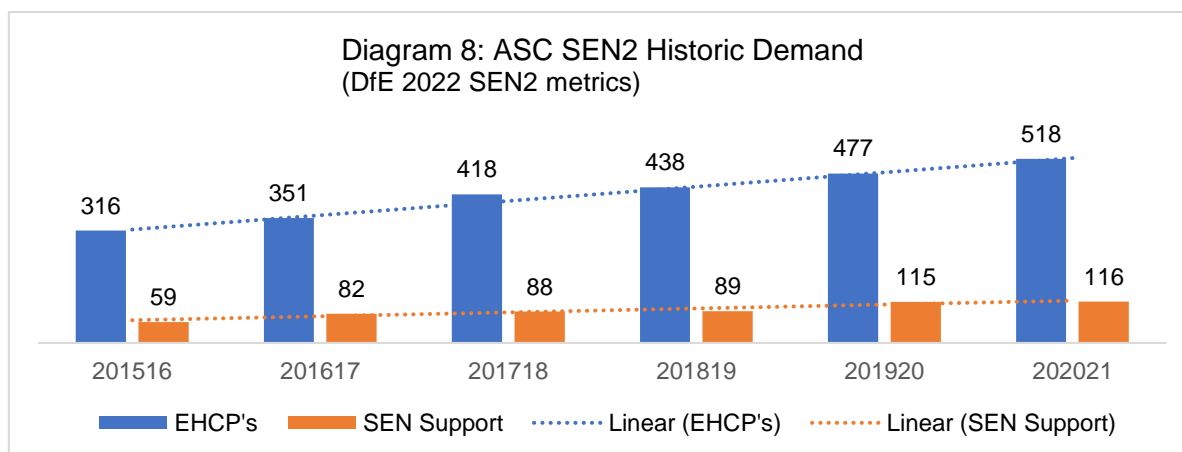


Diagram 8 similarly demonstrates the increasing trend over the past seven years of resident pupils with an EHCP where ASC is the primary need. This is reflective of the SEND reforms and extension of the EHCP cohort up to the age of 25, resulting in an increase in the cohort that would previously have accessed local adult social care provision and who are now remaining in education, frequently in costly independent placements. The diagram also demonstrates a slower growth at SEN support, which is steady in 2020-2021.



SEN2 for the reporting year 2020-2021 demonstrates that 39% of H&F children where ASC is the primary need, are educated in state primary and secondary schools in comparison with the much larger London average of 60%. Additionally, the number of ASC pupils that were being educated in state funded special schools was 61% compared with the London average of 39%. This percentage difference is explained by the fact that 61% largely accounts for EHCP ASC pupils educated both at Queensmill School and its satellite model whereby pupils remain on the roll of Queensmill School and not the roll of the relevant satellite host school.

The investment in the Autism Education Trust programme to embed the social model of inclusion is intended to strengthen the local ASC pathway and graduated approach to meet needs. This will begin to remedy the current H&F's position in relation to national ACS placement trends, along with a broader mix of provision,

including traditional resource base provision to provide sufficient step-up and step-down opportunities for pupils who can access a mainstream curriculum, but find accessing a mainstream classroom challenging. This will be key to reduce the current reliance on specialist settings.

In terms of forthcoming years, diagram 9 details the projected range of children and young people with an EHCP in H&F schools where Autistic Spectrum Condition is the primary identified need for the period 2023-2030.

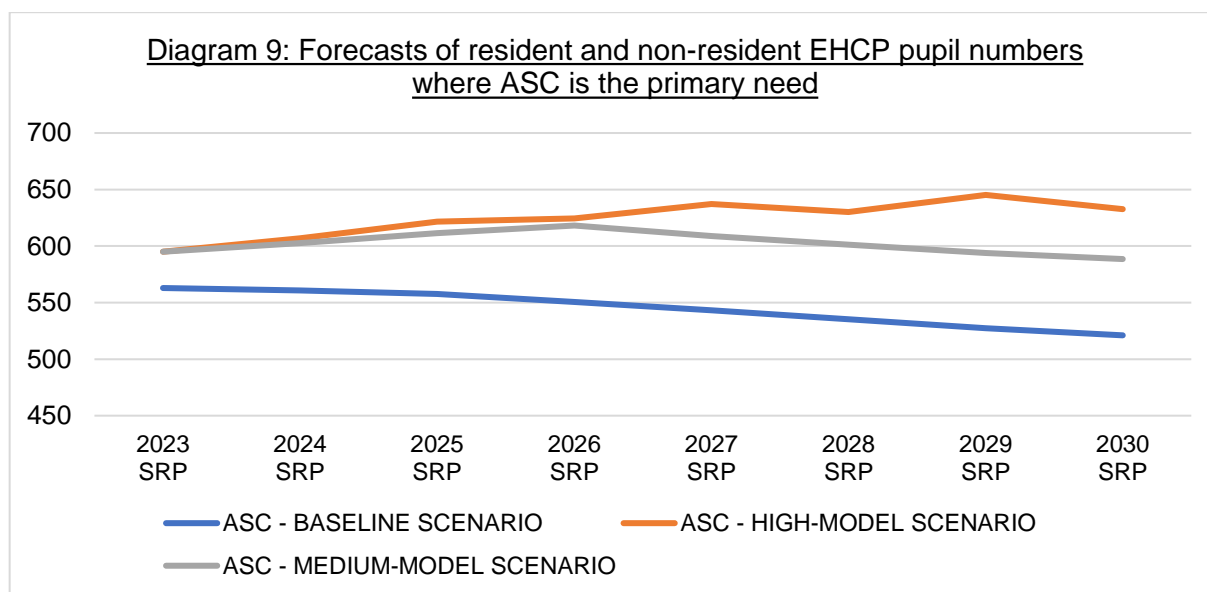


Diagram 9 indicates that growth between 2023-2030 is less than 1%, with a range of 589-633 pupils by 2030 based on the medium/high models.

Once again, an observation can be made contrasting annual out of borough (OOB) spend with annual in-borough spend: the cost of educating ASC EHCP pupils at independent/non-maintained / specialist settings, in 2022, OOB is approximately £2.85m – compared to an in-borough independent / non-mainstream spend of approximately £580,000.

Recommendation

- H&F will create enhanced ASC early years, primary and secondary provision in mainstream settings, utilising local expertise and developing capacity through a range of mechanisms both: a) existing and b) additional commissioning – to support children and young people whose autism impacts significantly on their ability to access a mainstream classroom, but who may be able to access elements of a mainstream curriculum. This includes the sufficiency of timely ASC outreach support.

Speech, Language and Communication Needs (SLCN)

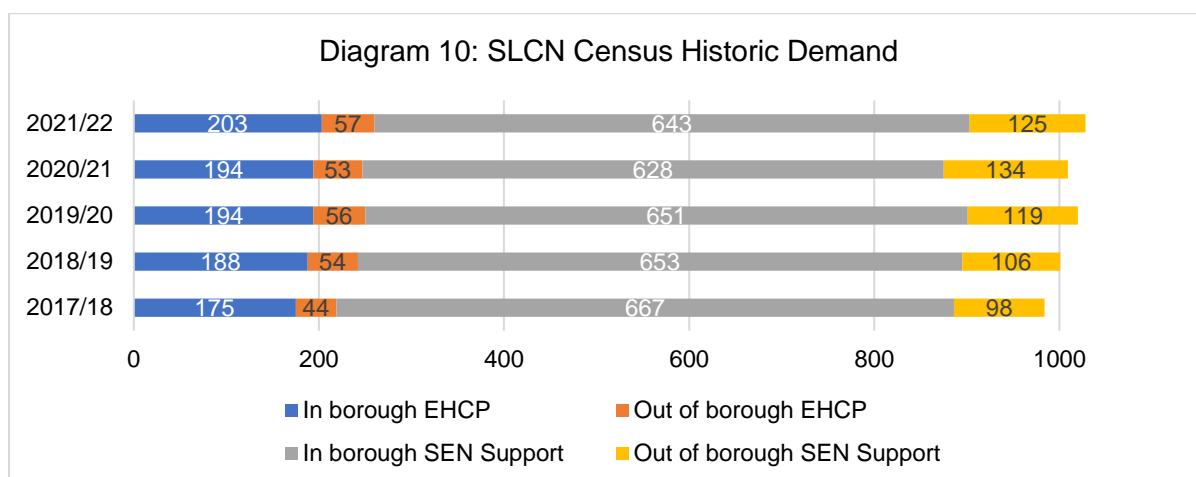
Following the COVID19 pandemic, SEND systems are seeing an increase in demand and complexity of need in relation to Speech, Language and Communication Needs. A report by Ofsted in June 2021⁵ found that existing weaknesses in the SEND system have been exacerbated by the pandemic, as children are more likely to have been 'out of sight' of services. Pressures in the system have been further compounded by the children and young people not accessing key services during the pandemic, which help with learning essential skills and knowledge, which could lead to misidentification as having SEND.

In acknowledging the gap in universal and targeted services for speech, language and communication needs, and in response to this as well as the increase in presentation, has made significant investment into a new Joint Communication Team to build capacity in H&F schools to meet needs at SEN Support and reduce escalation to statutory processes. This service launched in April 2022 and is therefore in its infancy, however, it is a key feature of the SEND Support offer aimed at meeting needs as part of the assess, plan, do, review graduated approach cycle. The Local Authority also commission provision in partnership with the Integrated Care Board to meet specialist needs specified within EHCP's.

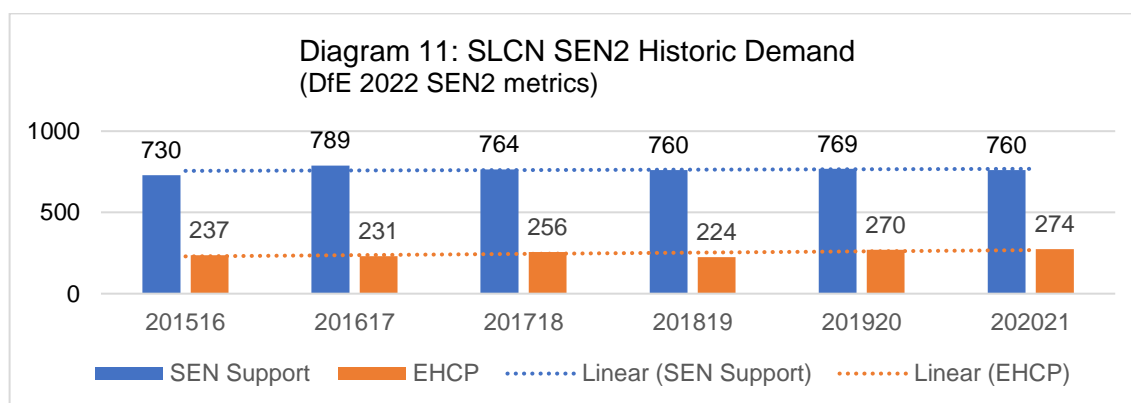
Within the borough, Miles Coverdale Primary School Specialist Resource Base is a specialist unit designed to meet developmental language disorder (DLD) needs in H&F. The unit can accommodate up to 20 learners and prior to the 2023/24 commissioning intentions has been solely for Key Stage 1 pupils. Following the creation of the Joint Communication Team and to reflect the increased offer available at SEN Support, the 2023/24 commissioning intentions have identified the 20 places for both Key Stage 1 and Key Stage 2, to support those pupils who would benefit from longer specialist input prior to transitioning into a mainstream setting. These needs have historically been met in high cost out of borough provision.

Analysis of Schools' Census data, detailed in diagram 10, indicates a gradual increase of resident pupils with an EHCP where SLCN is the primary need (average 5% per annum). The trend for resident pupils at SEN Support is relatively flat. Out of borough pupils with an EHCP and at SEN Support has grown at the slightly faster rate of 7% per annum.

⁵ [SEND: old issues, new issues, next steps - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/95444/SEND-old-issues-new-issues-next-steps-2021.pdf)



SEN2 Statutory Report data, see diagram 11, similarly indicates a gradual increase in EHCP’s maintained by H&F where SLCN is the primary need (at an average increase 4% per annum) with SEN Support consistently level.



SEN2 for 2020-2021 demonstrates that 45% of resident SLCN pupils are educated in mainstream primary compared to the London average of 56%.

For forthcoming years, diagram 12 details the forecasted range of children and young people with an EHCP in H&F schools where a Speech, Language and Communication Need(s) is the primary identified need – i.e., for the period 2023-2030.

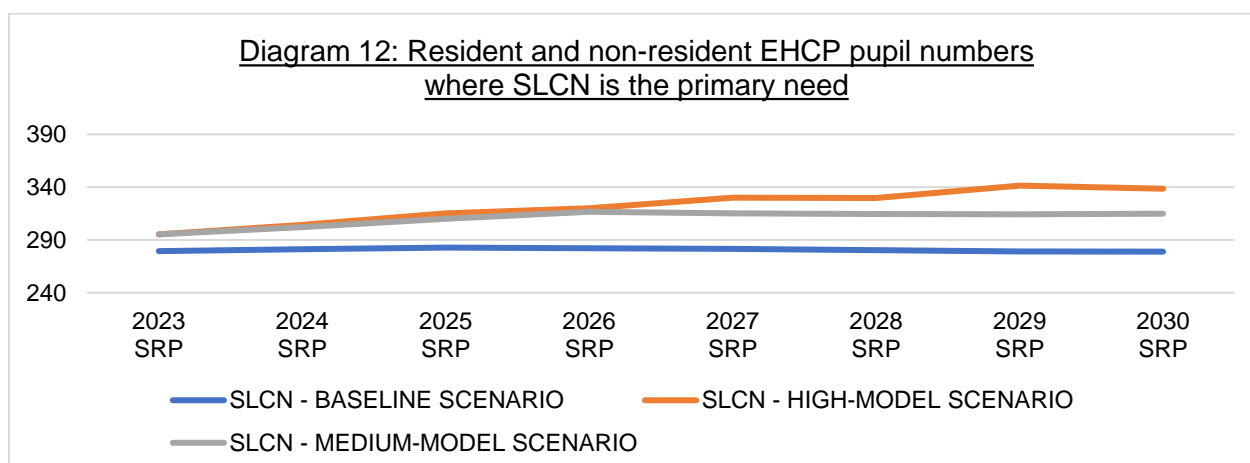


Diagram 12 indicates that across the mid-model scenario and the high-model scenario an average increase can be observed of 295 SLCN pupils with EHCPs in 2023 rising to an average number of 327 SLCN pupils with EHCPs in 2030 (an increase of 11%). However, H&F will monitor this potential trend aligned to the evolving role of its recently launched Joint Communication Team.

As with SEMH and ASC, an observation can be made contrasting annual out of borough spend (OOB) with annual in-borough spend H&F spends approximately £717,500 per annum (2022 data) on placements in OOB independent/non-maintained specialist settings for pupils with speech, language and communication needs compared to in-borough independent/non-maintained specialist spend of approximately £180,000.

Recommendations

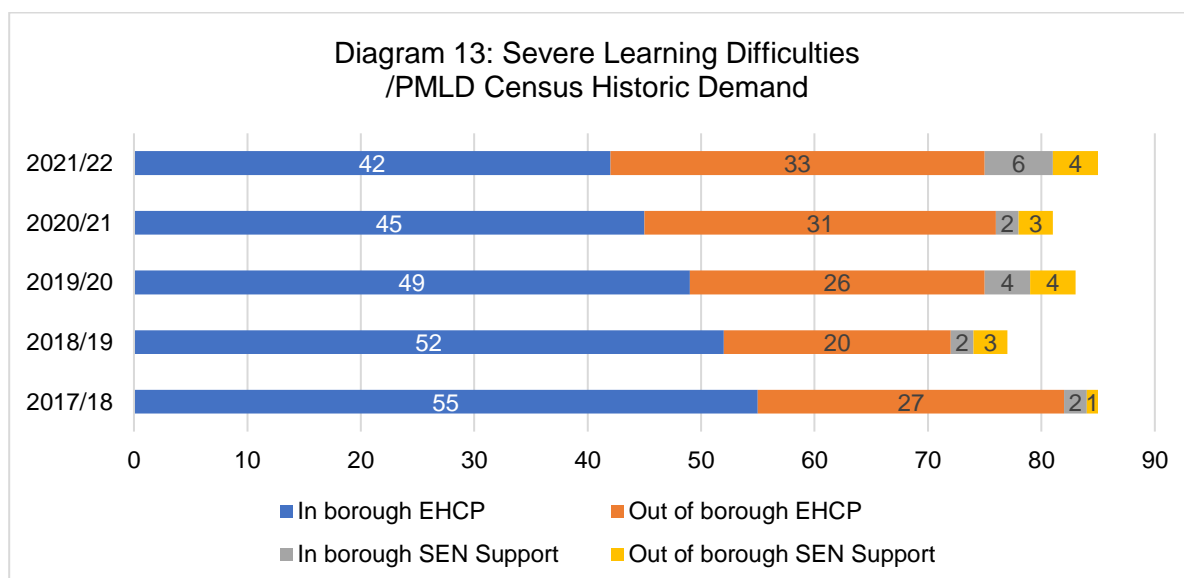
5. That H&F remodel the current provision to create a primary (Key Stage 1 and Key Stage 2) enhanced provision for pupils with complex speech, language and communication needs who would benefit from a language enriched environment. This should be achieved within the current commissioning arrangement for the primary provider
6. That H&F create an enhanced secondary provision for pupils with complex speech, language and communication needs who would benefit from targeted interventions in a language enriched environment with mainstream integration.
7. That H&F build on the work of the Joint Communication Offer to develop a robust SLCN pathway to meet the needs of children in their mainstream settings.
8. That H&F and local area partners implement a robust workforce development and ongoing training of mainstream partners, to reduce the reliance on specialist intervention/support.

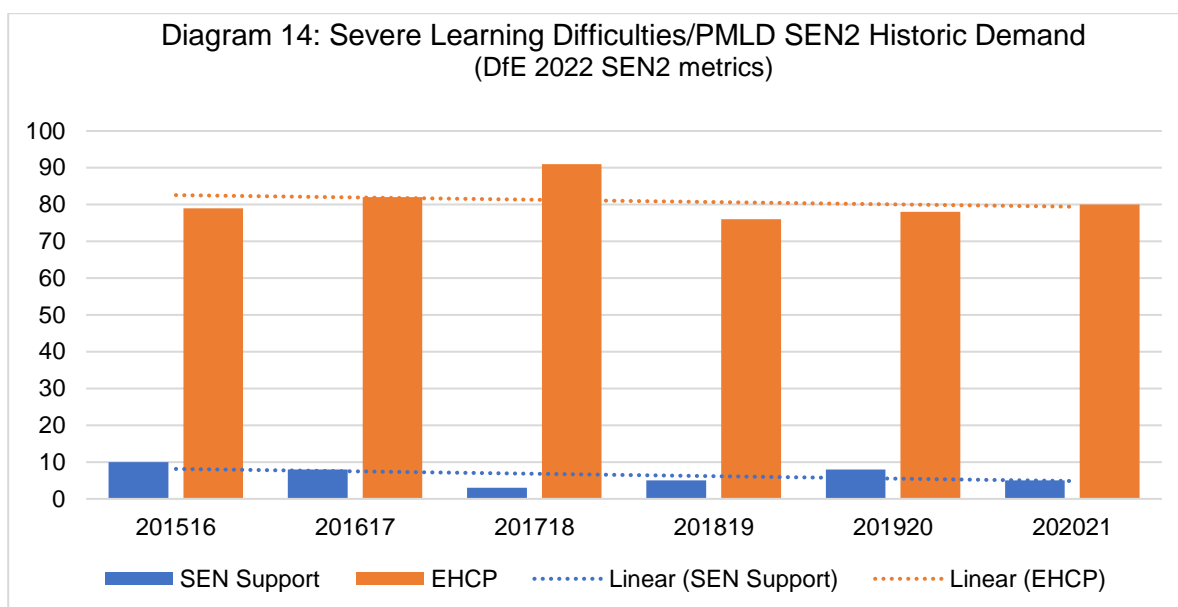
Severe Learning Difficulties (SLD) and Profound, Physical Disability, and Multiple Learning Difficulties (PMLD)

A significant challenge in the local area is the accessibility of our mainstream school estate to meet the needs of children and young people with physical disabilities, as most primary schools in H&F were built during the Victorian era. As part of our strategy to improve provision for SEND learners in mainstream settings the Council proposes to invest in physical infrastructure to support accessibility as part of our Capital Strategy. This will include remodeling access and reception areas, provision of disabled toilets and other modifications to support accessibility across the school estate.

Whilst the number of children and young people with SLD or PMLD is relatively small, national data from the Council for Disabled Children (councilfordisabledchildren.org.uk) which investigated understanding the needs of disabled children with complex needs or life-limiting conditions, indicates a likely increase in numbers of children and young people with PMLD due to advances in healthcare. H&F's main provision for children with Severe Learning Difficulties (SLD) and Profound and Multiple Learning Difficulties (PMLD) is Jack Tizard School.

Analysis of census data detailed in diagram 13 indicates a decreasing trend of resident pupils with an EHCP where Severe Learning Difficulties / Profound and Multiple Learning Difficulties is the primary need, whilst there is an increasing trend of out of borough pupils with an EHCP, albeit in small numbers. The resident pupil trend is consistent in the SEN2 data.





SEN2 data for 2020-2021 in diagram 14 also shows that 80% of the resident population with PMLD and Severe Learning Difficulties are educated in special school provision which is line with the London average of 83%. 13% are educated in mainstream primary compared to 10% in London. 3% are educated in mainstream secondary compared to 5% in London. 6.5% of EHCP’s maintained by H&F have PMLD and Severe Learning Difficulties as the primary need, compared to London at 11% and England at 13.5%.

For forthcoming years, diagram 15 details the forecasted range of children and young people with an EHCP in H&F schools where Severe Learning Difficulties or Profound Multiple Learning Difficulties is the primary identified need for the period 2023-2030.

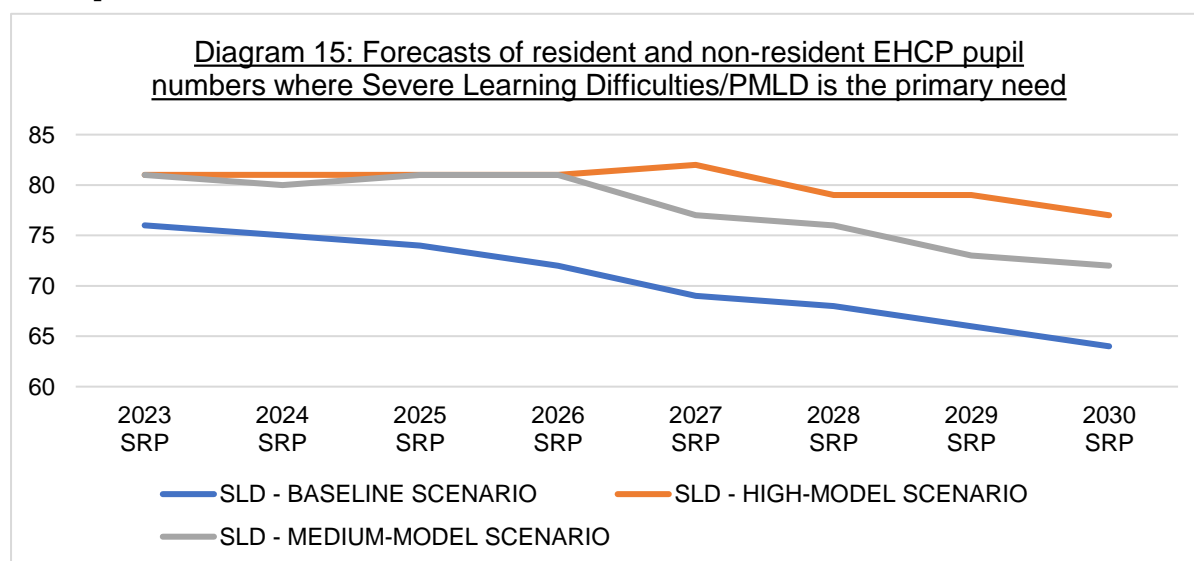


Diagram 15 indicates that across the mid-model scenario and the high-model scenario a decrease can be observed of 81 Severe Learning Difficulties/PMLD pupils with EHCPs in 2023 reducing to an average number of 75 Severe Learning

Difficulties/PMLD pupils with EHCPs in 2030 (-7%). However, due to the complexity of need and the subsequent physical space needed to be able to meet such needs, consistent feedback received in summer 2022 was that Jack Tizard School would benefit from additional space.

Recommendations

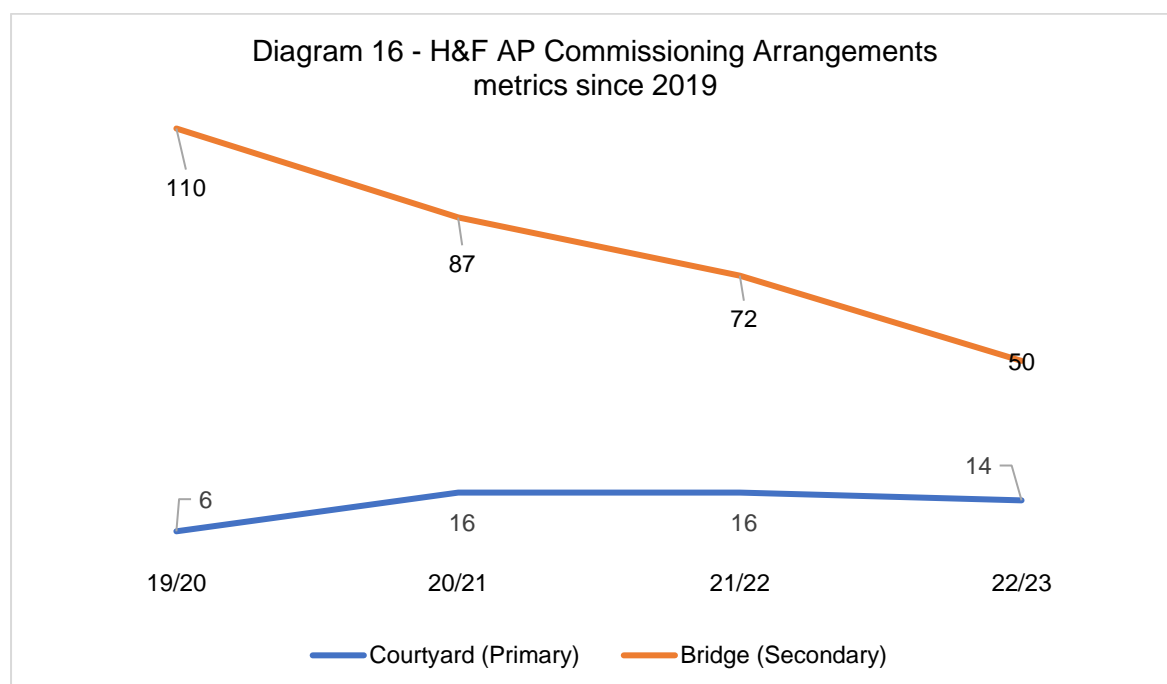
9. That H&F undertake an accessibility audit – which is tailored to effectively address SEND types – and deliver a plan to improve accessibility for pupils within mainstream schools.
10. That H&F and SEND partners develop a robust Severe Learning Difficulties, PMLD, and physical disability pathway, for young people, that support: (a) the timely transition to adult education, social and health services and: (b) deliver the best Preparing for Adulthood outcomes.

Alternative Provision

H&F commissioned Alternative Provision arrangements are delivered by Ormiston Academy Trust. Ormiston Courtyard Academy provides places for primary age pupils and the Ormiston Bridge Academy for secondary age pupils. The places commissioned are for:

- Permanently excluded pupils
- Placements agreed via H&F Fair Access Panel
- H&F Council agreed managed moves

Since 2019, there has been significant focus by H&F on early intervention and the management of referrals and funding to reduce the number of children and young people requiring Alternative Provision. This is evidenced in diagram 16 which shows the commissioned numbers from 2019-2020 to date. The current commissioned provision reflects an analysis of historic demand by officers to determine the likely placement requirements moving forward.



The March 2022 SEND Green Paper focuses on the theme of Alternative Provision and it incorporates several relevant themes for H&F and relevant aspirations:

- To ensure that alternative provision is an integral part of the local SEND system by requiring the local SEND partnership to plan and deliver an alternative provision service focused on early intervention.
- Ensure that alternative provision schools have funding stability to deliver services focused on early intervention
- Ensuring that there is continued oversight and transparency of pupil movements, through effective processes and systems within the local area.

Existing H&F strategic place planning aligns to an ambition of early intervention,

which has supported the fall in numbers presented above. However, the need for Alternative Provision within H&F is likely to link with, and be related to, the incidence of SEMH pupils - and as detailed above shows this incidence is forecast to increase. It should however be noted that recent increases in the number of SEMH EHCPs have not immediately fed through to increases in demand for AP. This is likely linked to the development of outreach programmes, strong outcomes across the system and a continued focus on early intervention and support.

Recommendations

11. H&F will reform Alternative Provision to reflect short-term targeted interventions - with a key focus on reintegration for a pupil back into mainstream school.
12. H&F will continue with the current commissioned numbers for Alternative Provision detailed within the existing SLA, as these currently align to the projected local needs.

Post 16 provision

The local area has a statutory duty across education, health and social care to support children and young people with special educational needs (SEN) or disabilities to prepare for adult life and help them go on to achieve the best outcomes in employment, independent living, health and community participation.

Our SEND Strategy identifies the priorities of developing a local area protocol and approach for managing transitions with the care plan at the core of provision and pathway planning and using this information to subsequently develop robust processes for joint planning current and future cohorts to inform commissioning intentions and appropriate individual pathways.

The main H&F commissioned local Further Education provider for young people with SEND is West London College. The college offers an inclusive approach to post-16 education and training where SEND learners attend mainstream courses as well as bespoke provision through the inclusive learning department and the employment pathways through Supported Internship programmes, Inclusive Traineeships and Apprenticeships.

Aligned to the Greater London Authority (GLA) demographic/roll forecasts, analysis indicates that the proportion of young people in the 16-25 years tends to steadily increase over the forthcoming decade with a geographical focus on the North of the borough – an area which will see the most pronounced incidence of new housing developments. However, whilst the borough may observe peaks in the 16–25-year-old cohort, this is because of children aging through from 2022 and is not indicative of baseline population increases.

Recommendations

13. Aligned to proposed developments for Severe Learning Difficulties/Profound and Multiple Learning Difficulties, H&F will develop further and enhanced Local Offer pathways for 16–25-year-olds which focus on positive life outcomes, mainstream inclusion and transition.
14. H&F will look to progress, potentially in partnership with our West London partner LAs, the development of a post-16 banded funding model to ensure the cost of support and further educational provision is equitable.

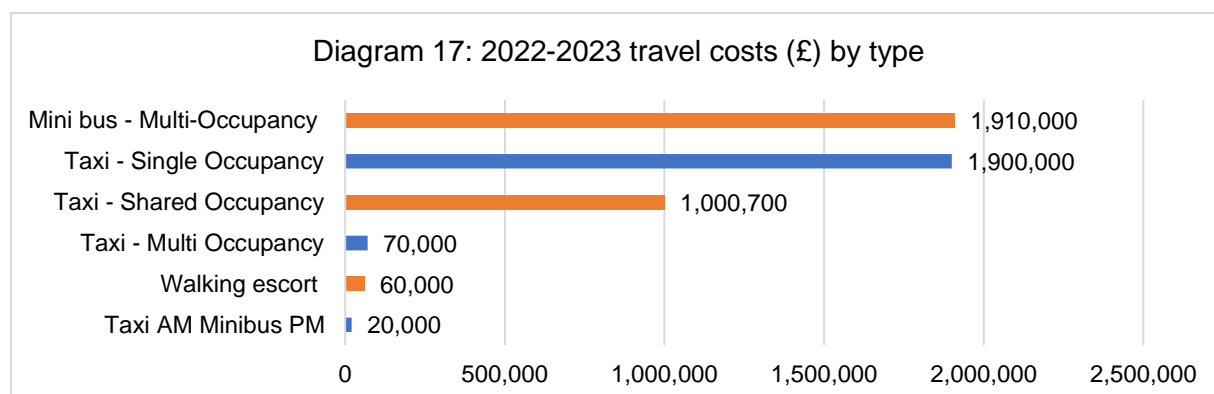
SEND Travel Support

The 2022/23 budget for Travel Care and Support is £4.187m (excluding inflation uplift), with a forecasted final position of £5.034m.

London Councils have advised that these financial pressures are being felt across London. In a report issued in February 2022 titled '*Findings from London Councils' SEN transport research*' they state that spend on SEN transport services will have increased by 37% over four years from 2018/19, based on borough estimates across 28 boroughs (86% response rate). H&F's increase is 33% for the same period.

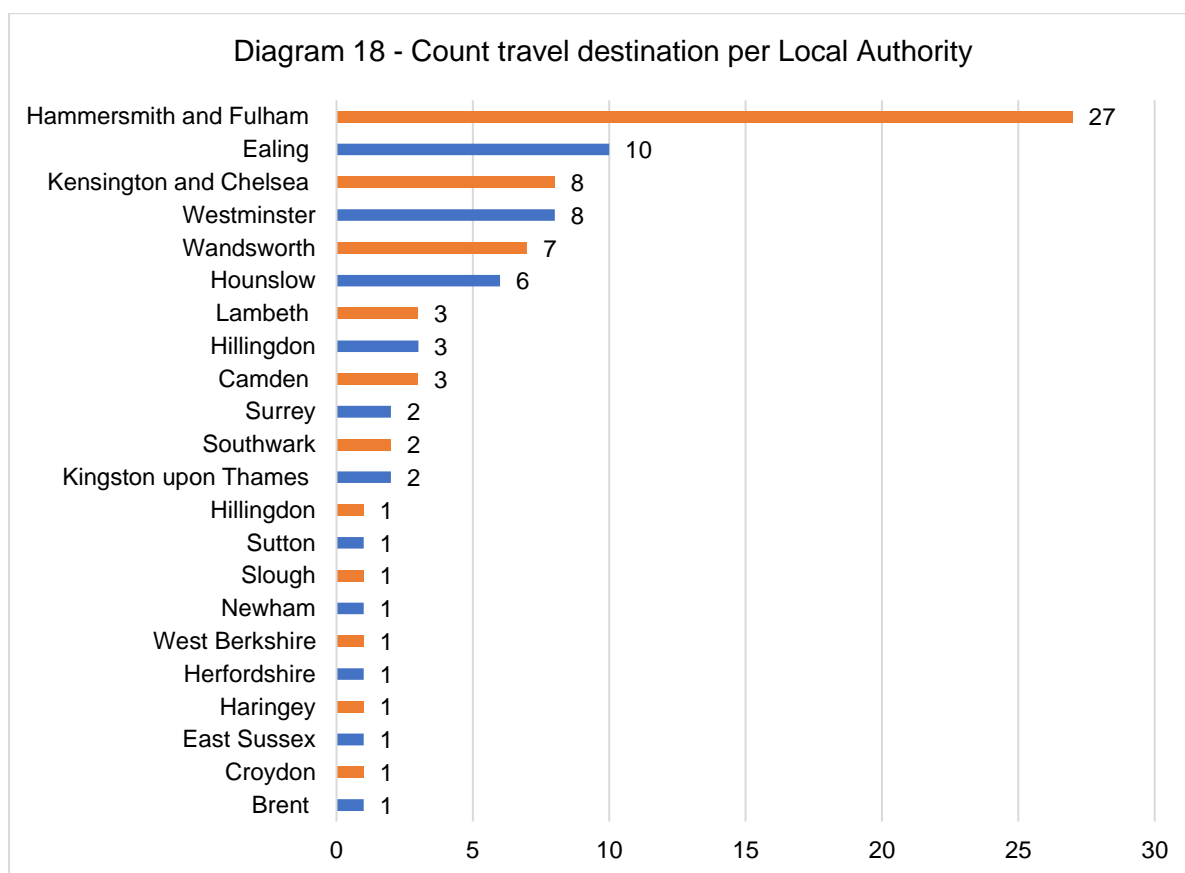
Benchmarking spend against other boroughs is a challenge for travel care services given the significant variation in contractual arrangements and in-house fleets as well as the sufficiency of local education placements. A benchmarking exercise against two neighbouring authorities which most closely reflect the H&F landscape⁶ demonstrates that transport spend per head of EHCP population is broadly comparable across the three boroughs.

SEN transport funding is included in the general grant from the Department for Levelling Up, Housing and Communities (DLUHC). Given the huge increase in costs in recent years of delivering SEN transport services, which are still experiencing growing demand coupled with the impact of COVID, London Councils are lobbying government for a fairer funding allocation for London boroughs as part of the formula review which is expected this year. SEN transport will be included in this lobbying with an emphasis on ensuring that funding allocations keep up with costs.



The number of destinations that children are transported to has increased over the four-year profile from 75 to 110 destinations as at the end of 2021-2022. In 2022-2023, 71% of the destinations are to out of borough schools linked to the lack of sufficient local provision. This in turn limits the viability of being able to use shared transport and increases the journey times and subsequently costs. In 2022-2023, £1.9m is forecasted to relate to single occupancy transport.

⁶ 19/20 Section 252 Outturn position (latest data pre-COVID19 effect).



There is similarly high transport expenditure for the post-16 cohort because of a lack of sufficient local Employment, Health, and Social Care pathways, resulting in children and young people remaining in Education longer than is required. This gap in pathways results in a pressure both within the General Fund Transport Budget as well as the High Needs Block in relation to the Education placement. There is approximately £1.4m of transport costs in the 2022-2023 for the post-16 cohort for 94 young people.

SEND Sufficiency Review 2022-2027 Final General Recommendations

To ensure that the specific recommendations in relation to primary needs can be most effectively implemented and that they can be realised, H&F will also:

Recommendations

15. Refresh the H&F Ordinarily Available Guidance so that it clearly outlines the local provision and responsibilities of schools, health and care partners for 0-25 years SEND as part of the graduated approach.
16. Reinforce local area values and visioning to support a shared understanding of local partners' responsibilities and the joint stewardship of H&F High Needs Block allocation, alongside work to finalise the local area SEND strategy.

The analysis that has informed the production of this SEND Sufficiency Review has informed specific recommendations aligned to distinct types of needs for H&F 0–25-year-olds. Those recommendations will in turn inform the development of a SEND Sufficiency Review Action Plan, along with H&F Schools Organisation Plan and SEND Capital Strategy to set out the local area response to this review.

Consolidated Recommendations

1.	H&F create a specialist SEMH provision for primary and secondary aged pupils.
2.	H&F remodel and strengthen the SEMH outreach provision to support a graduated approach, to meet the needs of pupil in their local mainstream school.
3.	The Learning Partnership to include SEMH training for H&F settings as part of the ongoing CPD programme to support school partners to better identify and meet SEMH needs.
4.	H&F will create enhanced ASC early years, primary and secondary provision in mainstream settings, utilising local expertise and developing capacity through a range of mechanisms both: (a) existing and (b) additional commissioning - to support children and young people whose autism impacts significantly on their ability to access a mainstream classroom, but who may be able to access elements of a mainstream curriculum. This includes the sufficiency of timely ASC outreach support.
5.	H&F remodel the current provision to create a primary (Key Stage 1 and Key Stage 2) enhanced provision for pupils with complex speech, language and communication needs who would benefit from a language enriched environment. This should be achieved within the current commissioning arrangement for the primary provider
6.	H&F create an enhanced secondary provision for pupils with complex speech, language and communication needs who would benefit from targeted interventions in a language enriched environment with mainstream integration.
7.	H&F build on the work of the Joint Communication Offer to develop a robust SLCN pathway to meet the needs of children in their mainstream settings.
8.	H&F and local area partners implement a robust workforce development and ongoing training of mainstream partners, to reduce the reliance on specialist intervention/support.
9.	H&F undertake an accessibility audit – which is tailored to effectively address SEND types – and deliver a plan to improve accessibility for pupils within mainstream schools.
10.	H&F and SEND partners develop a robust Severe Learning Difficulties, PMLD, and physical disability pathway, for young people, that support: (a) the timely transition to adult education, social and health services and: (b) deliver the best Preparing for Adulthood outcomes.
11.	H&F will reform Alternative Provision to reflect short-term targeted interventions - with a key focus on reintegration for a pupil back into mainstream school.
12.	H&F will continue with the current commissioned numbers for Alternative Provision detailed within the existing SLA, as these currently align to the projected local needs.
13.	Aligned to proposed developments for Severe Learning Difficulties/Profound and Multiple Learning Difficulties, H&F will develop further and enhanced Local Offer pathways for 16–25-year-olds which focus on positive life outcomes, mainstream inclusion and transition.

14.	H&F will look to progress, potentially in partnership with our West London partner LAs, the development of a post-16 banded funding model to ensure the cost of support and further educational provision is equitable.
15.	Refresh the H&F Ordinarily Available Guidance so that it clearly outlines the local provision and responsibilities of schools, health and care partners for 0-25 years SEND as part of the graduated approach.
16.	Reinforce local area values and visioning to support a shared understanding of local partners' responsibilities and the joint stewardship of H&F High Needs Block allocation, alongside work to finalise the local area SEND strategy.

Glossary

Primary Needs

ASC	Autism Spectrum Condition
SEMH	Social, Emotional and Mental Health
HI	Hearing Impairment
MLD	Moderate Learning Difficulties
MSI	Multi-Sensory Impairment
PD	Physical Difficulties
PMLD	Profound and Multiple
SLD	Severe Learning Difficulties
SPLD	Specific Learning Difficulties
SLCN	Speech, Language and Communication Needs
VI	Visual Impairment

Broad areas of SEND

<p>Social, emotional, and mental health difficulties (SEMH)</p>	<p>Children and young people may experience a wide range of social and emotional difficulties which manifest themselves in many ways. These may include becoming withdrawn or isolated, as well as displaying challenging, disruptive, or disturbing behaviour. These behaviours may reflect underlying mental health difficulties such as anxiety or depression, self-harming, substance misuse eating disorders or physical symptoms that are medically unexplained. Other children and young people may have disorders such as attention deficit disorder, attention deficit hyperactive disorder or attachment disorder.</p>
<p>Sensory and/or physical needs</p>	<p>Some children and young people require special educational provision because they have a disability which prevents or hinders them from making use of the educational facilities generally provided in a mainstream setting. This includes pupils with visual impairment (VI), hearing impairment (HI) or a multi-sensory impairment (MSI) who are likely to require specialist support and/or equipment to access their learning or support. It also includes those with a severe physical disability (PD).</p>
<p>Cognition and learning</p>	<p>Learning difficulties cover a wide range of needs, including moderate learning difficulties (MLD), severe learning difficulties (SLD) - where children are likely to need support in all areas of the curriculum and have associated difficulties with mobility and communication - through to profound and multiple learning difficulties (PMLD). Children with PMLD are likely to have severe and complex learning difficulties as well as a physical disability or sensory impairment. This range of needs also includes specific learning difficulties (SpLD) which encompasses a range of conditions such as dyslexia, dyscalculia and dyspraxia.</p>
<p>Communication and interaction</p>	<p>Children and young people with speech, language and communication needs (SLCN) have difficulty in communicating with others. They may have difficulty with one, some or all of the different aspects of speech, language or social communication at different times of their lives. This area includes those children and young people with Autism who also are likely to have difficulties with social interaction, and with language, communication and imagination, which can impact on how they relate to others.</p>

Other terms or acronyms

Academy	Schools controlled and funded directly by the Secretary of State for Education and include Academies, Free schools, UTC Schools, Studio schools, Academy special schools, alternative provision Academies and Academy boarding schools.
Alternative Provision (AP)	Education in a setting that is not a mainstream or special school. The education should be based on the needs of the child and can be provided through a variety of routes, including pupil referral units (PRUs).
Co-production	Co-production is a collaborative approach to decision-making and service design that recognises for organisations to deliver successful services, they must understand the needs of their users and engage them closely in the design and delivery of those services.
Education, Health, and Care Plan (EHCP)	An EHC plan details the education, health and social care support that is to be provided to a child or young person who has SEN or a disability. It is drawn up by the local authority after an EHC needs assessment of the child or young person has determined that an EHC plan is necessary, and after consultation with relevant partner agencies
Enhanced Provision	Also known as Resourced Provisions, are where places are reserved at a mainstream school for pupils with a specific type of SEN, taught mainly within mainstream classes, but requiring a base and some specialist facilities around the school.
Graduated Approach	The SEND Code of Practice says that schools should follow a graduated approach when providing SEN Support. This is based on a cycle of: Assess, Plan, Do, Review
Health and Care Partnership	Hammersmith & Fulham Health and Care Partnership is a collective of health, care and wellbeing organisations and resident representatives dedicated to improving the health and wellbeing of residents.
Independent mainstream school	Schools that charge fees instead of being government funded.
Independent special school	The Department for Education defines an Independent Special School as a private school specialising in teaching children with special educational needs.
Integrated Care Board (ICB)	Each ICS has an integrated care board, which is a statutory NHS organisation responsible for developing a plan in collaboration with NHS trusts/foundation trusts and other system partners for meeting the health needs of the population, managing the NHS budget and arranging for the provision of health services in the defined area.
Integrated Care System (ICS)	ICSs are partnerships of NHS bodies and local authorities, working with other relevant local organisations, that come together to plan and deliver joined up health and care services to improve the lives of people in their area.
Mainstream school	School provision other than special schools, hospital schools, alternative provision i.e., mainstream community schools, voluntary-aided, trust, foundation, or grammar schools
Maintained	A school that is funded by a local education authority.

school	
Non-maintained special school	Non-maintained special schools are defined by the DfE as schools for children with special educational needs that the Secretary of State for Education has approved under section 342 of the Education Act 1996. They are independent of the local authority and operate on a not-for-profit basis.
Ordinarily Available Guidance	Ordinarily Available Guidance refers to the support that all H&F schools, early years and post 16 settings should be able to provide for children/young people, including those with SEND, from within their own resources.
Outcome	An outcome can be defined as the benefit or difference made to an individual because of an intervention. It should be specific, measurable, achievable, realistic and time bound (SMART).
School SEN Support	A category for young people who need extra specialist support but not an EHC plan. This may take the form of additional support from within the school or require the involvement of specialist staff or support services. The purpose of SEN support is to help children achieve the outcomes or learning objectives that have been set for them by the school.
Special Educational Needs (SEN)	A child or young person has SEN if they have a learning difficulty or disability which calls for special educational provision to be made for him or her. A child of compulsory school age or a young person has a learning difficulty or disability if he or she has a significantly greater difficulty in learning than the majority of others of the same age or has a disability which prevents or hinders him or her from making use of educational facilities of a kind generally provided for others of the same age in mainstream schools or mainstream post-16 institutions.
Special School	A school which is specially organised to make special educational provision for pupils with SEN
Transition	The process of moving from one school phase or another or from school to adult life.

Acknowledgements

This review was extensively co-produced with stakeholders across the borough who all contributed to the development of our local area approach. Thank you to all those involved for your invaluable insight, practical suggestions, and constructive criticism.

The result has been a series of recommendations which seek to ensure the long-term suitability of provision across the borough which sets a strong framework for establishing robust provision to improve outcomes for our children with SEND.

With sincere thanks to:

- Hammersmith and Fulham Integrated Care Board
- Central London Community Healthcare NHS Trust
- West London Trust
- Chelsea and Westminster Hospital
- H&F Special Educational Needs and Disabilities Information, Advice and Support Service (SENDIASS)
- H&F Child and Adolescent Mental Health Service (CAMHS)
- Schools
- ParentsActive
- Children's Engagement Team and all young people who contributed
- Hammersmith & Fulham Children's Services