

Cabinet

DSG Recovery Plan and DSG Sustainability Plan

9 July 2020

Recommendations

That Cabinet:

- 1) Approves the Dedicated Schools Grant (DSG) Recovery Plan
- 2) Approves the sum of £554,187 from the Sustaining Prevention Fund to be allocated to the SEND & Inclusion Change Programme
- 3) Continues to raise the issue of sufficient funding for High Needs through direct correspondence with the Secretary of State/Chancellor of the Exchequer and through the Local Government Association, County Council Network and f40 group

1. Executive Summary

- 1.1 The purpose of this report is to present the Recovery Plan for the Dedicated Schools Grant, as a result of overspend in the High Needs Block.
- 1.2 As noted in June's Cabinet report, the challenges in the SEND system within Warwickshire are significant. In short, the Recovery Plan will only reduce the deficit, and not resolve it. Delivering statutory duties within the allocated budget from the Department for Education is not considered viable or sustainable.
- 1.3 The crisis in SEND funding and services is a national issue facing all councils and has been reflected in a number of recent reviews including the [Public Accounts Committee](#), [National Audit Office](#), [County Council Network](#) and [Local Government Association](#). The National Audit Office concluded that: *'The system for supporting pupils with SEND is not, on current trends, financially sustainable.'*
- 1.4 Warwickshire must ensure that within budget allocation and statutory duties, it delivers value for money. Fundamental transformation is needed within the SEND system in Warwickshire to deliver the scale of change required. Again, as noted in June, there are three main challenges facing the Council:
 - i.) The DSG Recovery Plan, which is being developed, does not currently lead to full financial recovery against the in-year or cumulative overspend.

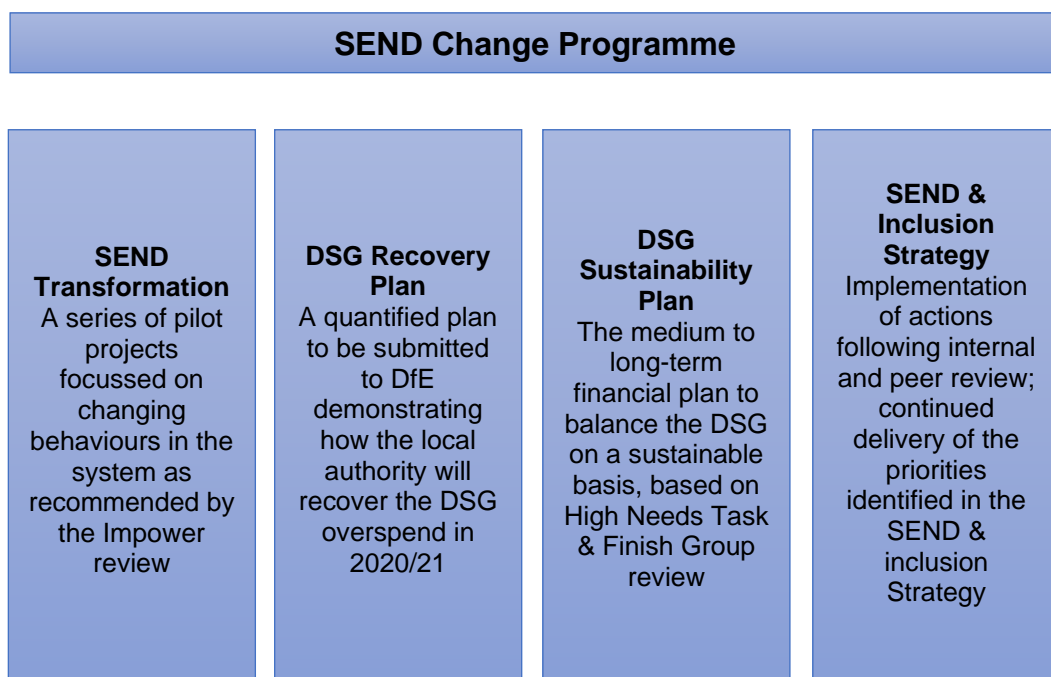
WCC could make meaningful inroads to the overspend alongside addressing increasing demand, adhering to statutory duties and delivering the SEND & Inclusion Strategy. Given the scale of the financial challenge this will likely fall short of closing the annual gap, meaning cumulative deficits being carried forward into future years unless alternative Council funding is permitted (subject to Secretary of State approval as this is against current DfE rules) or national additional funding; and

- ii.) Demand to meet SEND requirements continues to increase at a faster rate than change can be delivered. Investing the right level of resources to support the SEND Change Programme and seeking to address the projected overspends will be key. However, this won't necessarily speed up the full benefits realisation which is expected to be delivered over a five year programme of work. Further detailed work will be undertaken by officers on the level of investment required to support the SEND Change Programme and where this could be funded from.
- iii.) In order to achieve the scale of change required within the SEND area the programme will require some difficult choices to be made. Based on other Councils' experiences this is necessary and is highly likely to generate strong views and feelings from some of those impacted. Without strong leadership support for this, we will be unable to deliver the full benefits of our recovery and sustainability plans.

2. SEND Change Programme

2.1 The SEND Change Programme (approved by Cabinet in June) brings together plans on four areas:

- (i) transformation of system behaviours (informed by an external review undertaken by Impower);
- (ii) DSG Recovery Plan for the year 2019/20;
- (iii) DSG Sustainability Plan 2027/8; and
- (iv) Delivery of statutory duties (including the SEND and Inclusion Strategy).



- 2.2 Local authorities can no longer fund services within the DSG block (see 4.5), however, WCC can allocate resources to deliver the SEND Change Programme. The programme enables the Council to use the corporate infrastructure to address the system behaviours, savings and financial sustainability, whilst ensuring delivery of statutory duties. The programme will be managed in accordance with the Council's programme management standards and it is intended that additional capacity will be provided by the programme management teams.
- 2.3 The full list of projects is available at Appendix A. These projects cover savings, delivery of statutory duties and best practice. Warwickshire is yet to receive its Ofsted/CQC SEND Local Area Inspection, one of only two local authority areas in the West Midlands not to have done so.
- 2.4 In order to deliver the first phase of the programme (21 projects) the following costs have been identified.

Title	Estimated Cost (£0)	Activity	Period
Subject Matter Expert (SME) x6	£60,000	External review, challenge and recommendations on individual service areas (service review) and development of quality assurance documentation on EHC needs assessment.	June 2020 – March 2021
IMPOWER Projects	£360,000	To test and develop effective approaches to early intervention in relation to Special Educational Needs and Disabilities (SEND) to best serve local children, young people and their families.	July 2020 – Sept 2021
PMO: Programme Manager x1 Project Managers X3 Business Analysts X3 Project Support Officer x1	£494,045	To oversees project and programme delivery and ensures appropriate governance, monitoring and stakeholder engagement is in place. Responsible for PPD's, and business case development, for risks and issues reporting.	July 2020 – Sept 2021
SEND Project Officers x 2	£104,187	Dedicated capacity from the business (SEND & Inclusion) to drive through changes in the projects.	Sept 2020 – Sept 2021
Communications	£30,000	Supports with change communications activity including school leaders, parents and carers, and the wider public.	July 2020 – Sept 2021

2.5 These costs have been approved by the Change Portfolio Board (30th June). Costs for Programme Management Office (PMO) will be funded through the Organisational Change Fund. It is proposed that remaining costs of £554,187 are funded from the Sustaining Prevention Fund.

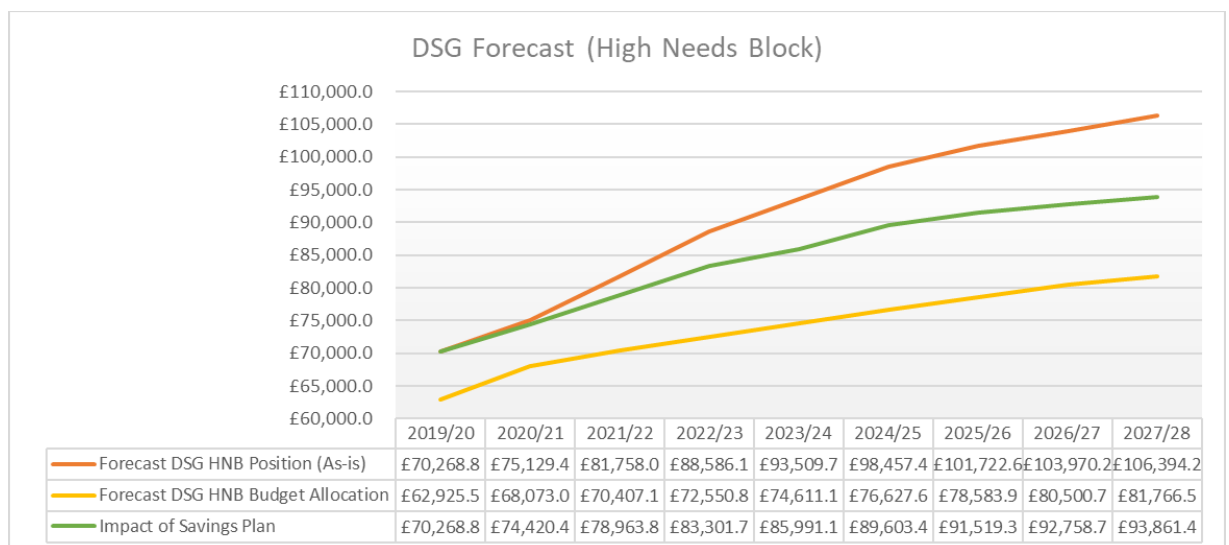
3. DSG Recovery Plan and Sustainability Plan

3.1 Due to the overspend of £7.34m in the High Needs Block in 2019/20, the overall Dedicated Schools Grant has overspent by more than 1%. As a result, it is expected that a DSG Recovery Plan for 2020/21 must be submitted to the DfE 'as and when requested'.

3.2 The DSG Recovery Plan covers the period April 2020 – March 2023 to show how overspend from 2019/20 will be recouped over 3 financial years. However, as projections for future years forecast further overspends in future years, it is recognised that this plan is not sufficient and a DSG Sustainability Plan is required to address the build up of cumulative deficits and to look ahead longer term (to March 2028).

3.3 A sub-group of Schools Forum was established to set out a quantified plan for recovering the 2019/20 overspend. This is attached at Appendix B. This was shared with and discussed by the Schools Forum on 4th June 2020, who confirmed their support for the plan.

3.4 The current baseline projection shows the gap between expected yearly budget and expenditure to be £16.035m by 2022/23 and rising in subsequent years before interventions. The cumulative effect is an overspend of £80.412m by 2024/25 if no interventions are made (total of the gap between DSG Position and DSG Allocation over that period). The graph below shows the gap between forecast allocations and expenditure, with and without the proposed savings plan.



- 3.5 The measures proposed in the DSG Recovery Plan (Appendix B) are to be extended beyond the three-year period to create the DSG Sustainability Plan (Appendix C). The measures which will deliver forecast savings, supported by Schools Forum, are set out in the table below
- 3.6 In the context of SEND funding, it is important to be aware that placement costs differ and there is a “mix” of provision cost. Generally, costs in independent specialist provision are more expensive than state-funded specialist provision, which in turn are more expensive than state-funded mainstream provision. The DSG Recovery Plan complements other projects in the SEND & Inclusion Change Programme by re-ordering the current system to ensure state-funded provision has the right skills and resources to meet the needs of learners with SEND, thereby delivering better outcomes at lower cost.
- 3.7 It is also important to make clear that changing the overall distribution of placements is focussed on new placements. For existing placements, learners will only be able to move placements as and when it is in the learner’s interests to do so (e.g. at the end of a key stage, when another setting can meet need, and there is confidence that the learner can establish positive friendships). It must be noted that without parent/carer and the child or young persons’ agreement to the move the likelihood of this happening would be extremely difficult.

Intervention	Description
1. Continued increase in Resourced Provision capacity and utilisation <i>(Invest to save)</i>	Placements currently in special schools could be catered for in Resourced Provision, creating capacity in special schools and reducing the need for higher costs independent specialist placements; capital investment already secured.
2. Increase in special school capacity at the Pears site <i>(Invest to save)</i>	The 80 place provision for ASD/SEMH needs will reduce need for higher costs independent specialist placements; capital investment already secured.
3. Increase the timeliness of EHC plans issued in early years (ages 0-4) <i>(Invest to save)</i>	By ensuring package of support are in place earlier, the demand for special school (more costly) places in Reception Year and Year 1 should be reduced.
4. Align increase in EHC plans with statistical neighbours <i>(Clear, fair and transparent operating procedures)</i>	Assumed reduction in requests for assessment and fewer placements to be made in specialist provision (state-funded and specialist). Includes review current SEND Guidance and clarify thresholds for panel decision-making.
5. Contracts with Independent Specialist Provision to ensure financial discipline <i>(Contract Management)</i>	The Warwickshire framework contract limits 1% inflation to stated prices and ensure robust contract management

6. Reduce the use of alternative provision (<i>Service/system redesign</i>)	Placements in alternative provision have increased and now match (or sometimes exceed) special school costs. Packages of support in mainstream settings would be a less costly alternative and will ensure children remain in mainstream settings.
7. Invest to save in supported internships quality assurance (<i>Invest to save</i>)	By increasing the number of supported internships and ensuring they find employment we can achieve positive outcomes for the young person, cease the EHC plan and deliver savings for adult social care.

- 3.8 The Recovery Plan will continue to be developed to include further interventions when there is confidence that savings can be delivered. For example, the trial project 'Changing the Conversation' (part of SEND Transformation) will test with a sample of school consortia whether a different approach to early intervention will result in lower costs. There is a strategic aim to release more resources to mainstream schools to meet the needs of learners with SEND, but this must be matched by confidence that some of behaviours in the system will change.
- 3.9 Further to this, value for money reviews will take place of five local authority services funded by DSG to ensure resources are being used in the most efficient way to deliver good or better outcomes. A savings target has not been put on these reviews, but the scope for each review will require exploration of whether alternative service models would deliver efficiencies.
- 3.10 Some activities will focus on ensuring costs do not increase such as the review of the special school funding matrix. The matrix is used to identify the amount top-up funding that follows a learner in specialist settings, based upon their needs. The matrix is due to be reviewed.
- 3.11 We will work with partners in social care and health to ensure our joint commissioning arrangements continue to deliver value for money, in the face of increasing demand.
- 3.12 There are also a number of measures in the wider change programme that will contribute to savings indirectly. For example, training and workforce development, equipping schools and stakeholders with the skills to meet the needs of learners with SEND.
- 3.13 Officers will continue to explore opportunities for capital investment, based on a clear business case, to support the education of learners with SEND, particularly in the South of the County.
- 3.14 Activities that are considered 'business as usual', such as issuing EHC plans within 20 weeks, will continued to be monitored but do not form part of the programme. For clarification, there is no backlog with issuing EHC plans. In 2019, 89% of EHC plans were issued within the statutory 20 weeks (up from 30% in 2017). From January to May 2020, performance was 88%.

3.15 The DSG Recovery Plan will need support across the system to implement and therefore will require significant work with stakeholders including schools, parents and carers, children and young people and partner agencies. In particular, school leaders will need to support and implement change in local settings. At a strategic level, the Council will continue to work in partnership with the Schools Forum, including consideration of movements of funding (up to 0.5%) between blocks in the DSG.

4. Financial Implications

4.1 The DSG High Needs 2019/20 financial position was an overspend of £7.343m, offset by Council funds of £2.103m resulting in a deficit carry-forward of £5.240m as a starting point for the financial year 2020/21.

4.2 The increase in DSG High Needs Block funding allocations for 2020/21 was £5.147m, however the growth pressures in pupil numbers, complexity of need and unit cost of placement are expected to continue to out-strip the grant funding in this financial year resulting in a projected in year overspend.

4.3 The table below summarises the baseline forecast position before the interventions are modelled, as well as the financial impact of the interventions. As noted in the report the gap after the current seven planned interventions is £55.251m. By 2024/25 (the current period of the Council's MTFS), the annual savings required for full sustainability is £21.830m, the current planned interventions only achieve £8.854m of this (41%)

	2020/21 £000	2021/22 £000	2022/23 £000	2023/24 £000	2024/25 £000
1. Baseline Forecast Position					
DSG Deficit brought forward	(£5,240)	(£12,297)	(£23,648)	(£39,683)	(£58,582)
Annual (Over) Spend	(£7,056)	(£11,351)	(£16,035)	(£18,899)	(£21,830)
Cumulative Deficit	(£12,297)	(£23,648)	(£39,683)	(£58,582)	(£80,412)
2. Interventions					
Total annual savings from Interventions	£709	£2,794	£5,284	£7,519	£8,854
3. Impact after interventions					
DSG Deficit brought forward	(£5,240)	(£11,588)	(£20,145)	(£30,895)	(£42,275)
Annual (Over) Spend	(£6,347)	(£8,557)	(£10,751)	(£11,380)	(£12,976)
Cumulative Deficit	(£11,588)	(£20,145)	(£30,895)	(£42,275)	(£55,251)

4.4 Of the seven planned interventions the intervention highlighted as "S2" refers to the full utilisation of Special Schools and The Pears Project, the latter of which Cabinet has already approved plans for.

4.5 Following the recent change to the Terms and Conditions of the DSG, Councils are no longer able to fund any deficits within the DSG. The route to obtaining Secretary of State permission to overrule the Terms and Conditions have not

yet been articulated, nor has a precedent been set that this is possible. The Department for Education (DfE) has indicated councils should not set aside provision within their own accounts to offset any DSG deficits. However, this statement is inconsistent with guidance from the National Audit Office issued in March 2020 which confirms the previous position that there is no statutory basis for having a negative DSG Reserve and the accounting code under which our accounts are prepared which “neither anticipates or allows for a voluntary earmarked balance to be presented in a deficit position”. Therefore, to comply with DfE guidance and the accounting code under which we operate the Council will need to maintain a positive reserve equal and opposite to the negative DSG reserve until such time as a permanent resolution is in place. This position is consistent with the advice from our external auditors.

- 4.6 The agreed Council’s MTFS 2025 was to set aside enough reserves to offset the forecast High Needs Block cumulative deficit over the five-year MTFS, until the DSG is in a balanced position. The current amount set aside is £30m over five years. The level of the deficit now being forecast means the Council will have to put aside a further £25m of reserves requiring £5m a year to be generated and ring-fenced in reserves, if additional savings aren’t identified.
- 4.7 The implications of this report fundamentally impact the Council’s MTFS as approved at Council in February 2020. In the absence of Government implementing a sustainable, systemic resolution of the fundamental problems with the legislation, policy framework and funding to deliver it, any further allocations to reserves to address the cumulative gap will create a requirement to identify further savings within the MTFS refresh.
- 4.8 The proposed interventions do not currently sufficiently address the projected DSG High Needs deficit in either the short or long-term. The further potential measures that are referred to in this report (paragraphs 3.8 onwards) that are still in testing and/or early stages of development will need to be quantified when ready and the SEND change programme may need to identify, quantify and achieve additional interventions beyond those. It is recommended that Cabinet receive further updates on any actions and issues that will affect the sustainability of the High Needs Block both on a national and local level.

Financial Modelling Assumptions

- 4.9 The financial modelling of the pressures, growth and funding of DSG High Needs Block is a complex process, which relies on both quantitative as well as qualitative data and assumptions spanning multiple years and originating from multiple sources. The points below provide an overview of some of the high-level assumptions:
 - i.) the assumptions on the growth pressures are based on 2 years of historic data held by the Education Service as well as the ONS population;
 - ii.) transitional assumptions have been applied to pupil number movements between year group projections;
 - iii.) inflationary costs have only been applied to external providers based on historic trends; and

iv.) the DSG High Needs Block grant allocation has been modelled to take in account the anticipated growth in pupil number as well as inflating the rates of per pupil funding in line with previous years' increases for Warwickshire.

4.10 Any variation to the assumptions and / or any further intelligence which affect the current assumptions will impact the baseline projection, the value of the interventions and the financial position after such interventions.

5. Environmental Implications

5.1 There are no specific environmental implications arising from the decision being made as part of this report.

6. Timescales associated with the decision and next steps

6.1 The DSG Recovery Plan will be submitted to the Department for Education 'as and when' requested.

6.2 Each project has its own timeline and milestones (see Gantt Chart at Appendix A).

6.3 Regular reporting will be through the SEND & Inclusion Change Programme Board, as well as to Schools Forum, SEND & Inclusion Partnership and Overview & Scrutiny Committee.

6.4 Cabinet continues to raise the issue of sufficient funding for High Needs through direct correspondence with the Secretary of State and through the Local Government Association, County Council Network and f40 group.

Appendices

APPENDIX A: SEND & Inclusion Change Programme Projects

APPENDIX B: DSG Recovery Plan

APPENDIX C: DSG Sustainability Plan

APPENDIX D: Equality Impact Assessment (draft)

Background Papers

None

Supporting Papers

1. SEND Change Programme, Cabinet, 11th June 2020
2. Allocation of 2020/21 Dedicated Schools Grant, 30th January 2020, Cabinet
3. High Needs Block, 16th December 2019, Cabinet
4. SEND & Inclusion Strategy, 11th April 2019, Cabinet

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The report was circulated to the following members prior to publication:

Local Member(s):

Other members:

Cllr Izzi Seccombe
Cllr Colin Hayfield
Cllr Yousef Dahmash
Cllr Pam Williams
Cllr Corrine Davies
Cllr Dominic Skinner

APPENDIX A: SEND & INCLUSION CHANGE PROGRAMME PROJECTS

Priority 1 Projects

Ref	Group	Project	Type
106	<i>SEND & Inclusion Strategy (Existing)</i>	New special school (Pears)	Invest to save
96	<i>SEND Transformation & DSG Recovery Plan</i>	Trial 1: Changing the conversation (Impower) - increasing support to mainstream schools	Service/system redesign
102	<i>DSG Recovery Plan</i>	Improve timeliness of EHC plans in early years - Ensure early identification	Invest to save
103	<i>SEND Transformation & DSG Recovery Plan</i>	Trial 2: Needs-focused panels (Impower) / Align increase in EHC plans with statistical neighbours - including review of SEND guidance, and admissions guidance to specialist settings	Clear, fair and transparent operating procedures
107	<i>DSG Recovery Plan</i>	Reduce the use of alternative provision (Value for money review; including medical needs policy)	Service/system redesign
109	<i>DSG Recovery Plan and SEND & Inclusion Strategy</i>	Supported internships (Building the infrastructure)	Invest to save
126	<i>SEND & Inclusion Strategy (Additional)</i>	Quality Assurance Framework (EHC Plans)	Clear, fair and transparent operating procedures
128	<i>DSG Sustainability Plan</i>	Finance Process (including Import/Export checks)	Clear, fair and transparent operating procedures
105	<i>DSG Recovery Plan</i>	Resourced Provision - full utilisation and increased capacity (Invest to save)	Invest to save
108	<i>DSG Sustainability Plan</i>	Review special schools funding matrix (including commissioning processes)	Clear, fair and transparent operating procedures
111	<i>DSG Recovery Plan</i>	Value for money reviews of integrated SEND and Inclusion services	Value for money review

Priority 2 Projects

Ref	Group	Project	Savings
12	<i>SEND & Inclusion Strategy (Existing)</i>	Improving outcomes for SEND learners at each key stage (response to data trends)	Strategic planning
27	<i>SEND & Inclusion Strategy (Existing)</i>	Parenting Plan to support families (Early Help)	Building capacity

68	<i>SEND & Inclusion Strategy (Existing)</i>	Workforce development project (Developing skills in schools and support services)	Building capacity
98	<i>SEND Transformation</i>	Trial 3: Child centred inclusion pathways	Service/system redesign
99	<i>SEND Transformation</i>	Redesign of the Local Offer website (Impower)	Building capacity
100	<i>SEND Transformation</i>	Development of WCC Transitions guidance (Impower)	Clear, fair and transparent operating procedures
101	<i>SEND Transformation</i>	County-wide SEMH campaign (Impower)	Building capacity
6	<i>SEND & Inclusion Strategy (Existing)</i>	Review of children not receiving their educational entitlement	Service/system redesign
95	<i>SEND & Inclusion Strategy (Existing)</i>	Expanding representation on the Parent Carer Forum	Building capacity
129	<i>SEND & Inclusion Strategy (Existing)</i>	Updated Needs Assessment (JSNA)	Strategic planning

Priority 3 Projects

Ref	Group	Project	Savings
66	<i>SEND & Inclusion Strategy (Existing)</i>	Working with schools to develop peer to peer support on SEND	Building capacity
46	<i>SEND & Inclusion Strategy (existing)</i>	Preparation for adulthood strategy (health and social care pathways)	Service/system redesign
110	<i>DSG Recovery Plan</i>	Contract management of Independent Specialist Provision to ensure maximum use of framework contract including residential (limit to 1% inflation) <i>NB. Framework contract in place</i>	Contract management
130	<i>SEND & Inclusion Strategy (additional)</i>	Tribunal pathway	Clear, fair and transparent operating procedures
131	<i>SEND & Inclusion Strategy (additional)</i>	Annual Reviews	Clear, fair and transparent operating procedures
132	<i>SEND & Inclusion Strategy (additional)</i>	Implementation of Ready reckoner	Clear, fair and transparent operating procedures

Priority 4 Projects

Ref	Group	Project	Savings
57	<i>SEND & Inclusion Strategy (existing)</i>	Independent Travel Training	Service/system redesign
61	<i>SEND & Inclusion Strategy (existing)</i>	SEND Transport Policy Review	Clear, fair and transparent operating procedures
32	<i>SEND & Inclusion Strategy (existing)</i>	Disability Register	Clear, fair and transparent operating procedures



School and Early Years Finance (England) Regulations Local Authority Dedicated Schools Grant Deficit Recovery Plan

Please complete this recovery plan template outlining how you will bring your DSG deficit back into balance within a 3 year time frame. Please complete all relevant fields and return the completed recovery plan to financial.management@education.gov.uk

You may wish to include brief supporting attachments with your request such as forum minutes (if links not available) - these can be added towards the bottom of this page. Spreadsheet calculations should be included on the **Financial Summary** tab.

Local Authority	Warwickshire
Local Authority number	937
Does schools forum agree with this recovery plan and when was it presented to them?	Yes
If yes, please provide link(s) to the minutes and action plans from the schools forum agreement	

What plans have you put in place to reduce the deficit in increments over the next 3 years?

The Council is taking forward a SEND & Inclusion Change Programme including cultural change/behaviour change, the DSG Recovery Plan, a DSG sustainability plan and delivery of statutory duties. The Council is investing funding into the change programme. The programme will work in partnership with the Schools Forum, Parent/carers and all schools aimed at introducing greater value for money in the area of SEND spending. This partnership approach follows a High Needs Task and Finish Group with local Headteachers, SEND Coordinators and other Schools Forum members looking at our current use of resources and what interventions could be made to work within allocated budgets. In addition, we commissioned a review of our system by an organisation with a behavioural science approach, to identify the cultural changes needed to improve our local SEND system. Together, the recommendations from these strands of work form a local SEND Change Programme. The programme plan is approved and the initial cohort of projects are being scoped.

As a system we are facing increased numbers of EHC plans, increased requests for specialist provision, increased numbers of tribunals (often by-passing mediation), increased use of alternative provision, and significant population growth.

A key challenge for us locally is joint leadership across the system. We recognise that we require whole system change, covering: cultural change across all schools and fair and manageable DSG Block Transfers, ensuring mainstream schools are adequately resourced, development of new local provision, matching special school and resource base provision to future need, reviews of the use of alternative provision, and workforce development across the system. All these changes will create positive impact on the deficit but are long term developments that will take much longer than 3 years to build up to maximum impact.

Word count: 287

Can you specify how continuous improvement has reduced the deficit/ is going to reduce the deficit? This could include sharing best practice, new contracts, efficiency savings

In 2015, the Council launched the Vulnerable Learners Strategy. This was driven by forecasting that predicted a £13.7m overspend on the High Needs Block by 2019. It was recognised that there was an over-reliance on independent specialist provision that was driving up costs and as a result the Council expanded existing state-funded specialist provision, opened two new special schools (with a further one closed, redesignated and re-opened), established SEND resourced provision, and worked with local post 16 providers to increase in-County 16-25 provision. As a result the overspend was limited to £3.1m (which was met from Council reserves).

In 2017/18, the Schools Forum agreed a £2.5m savings plan. This focussed on local authority services and provision for children at risk of exclusion/excluded; top-ups to EHC plans were out of scope. Non-statutory provision was de-commissioned.

In 2019, a new SEND & Inclusion Strategy was launched. Whilst the number of placements in independent specialist provision reduced during 2015-2019, so too did the number of learners with EHC plans in mainstream settings. We have seen a significant increase in the number of learners attending state-funded specialist provision. Looking to the future, 68,000 homes are expected to be built over the next 10 years, with an expected increase of around 34,000 school age learners.

Our challenge is to 'promote inclusion' in our mainstream settings, giving schools the skills and resources to meet the needs of learners in their local schools, and building the confidence of parents and carers. In addition to this, the Council is also seeking to establish further resourced provision and specialist provision in line with population growth and the changing needs of the cohort.

Word count: 271

Please provide details of any previous movements between blocks, what current cost pressures those movements covered, and why those transfers have not been adequate to counter the new cost pressures

In 2017/18 the Schools Forum voted against moving funds from the Schools Block to the High Needs Block. In 2019/20 the Schools Forum again voted against moving funds to the High Needs Block, a decision upheld by the Secretary of State.

In consultation with schools, many headteachers saw the proposed transfer as not addressing the issue. Rather, transfers from Schools Block to High Needs Block puts more pressure on schools' abilities to support pupils with less complex SEND needs, which causes needs to escalate and create further High Needs Block pressures. This situation is further exacerbated by Warwickshire schools being in the F40 group of lowest funded local authorities in the country.

Word count: 112

Please provide details of contributions coming from the health and social care budgets towards the cost of high needs provision

Decisions on residential placements are made jointly with social care, with costs shared appropriately.
NHS CCG contributions to local community services (eg. speech and language therapy) are significant.
Challenges in joint commissioning centre around areas of growing need, where all agencies have budgets already allocated (eg. costs of specialist equipment, growing numbers of children and young people with mental health needs).

Word count: 61

Please explain how the LA has discharged its duties under section 149 of the Equality Act 2010, C&F 2014 and common law to consult with those affected by the changes proposed.

The SEND & Inclusion Strategy was subject to an Equalities Impact Assessment. All major projects are also subject to an Equalities Impact Assessment. Similarly all decisions taken regarding individual cases are taken with due consideration of legislative requirements including the Equality Act 2019 and the Children and Families Act 2014.

Word count: 50

Please include a summary of the savings/and or measure you propose to implement over the next three years which will reduce the overspend.

S1	Continued increase in Resourced Provision capacity and utilisation Placements currently in special schools could be catered for in Resourced Provision, creating capacity in special schools and reducing the need for higher costs independent specialist placements
S2	Increase in special school capacity at the Pears site The 80 place provision for ASD/SEMH needs will reduce need for higher costs independent specialist placements
S3	Increase the timeliness of EHC plans issued in early years (ages 0-4) By ensuring package of support are in place earlier, the demand for special school (more costly) places in Reception Year and Year 1 should be reduced.
S4	Align growth in EHC plans with statistical neighbours and population increase (eg. Review current SEND Guidance and clarify thresholds for panel decision-making) Assumed reduction in requests for assessment and slow-down in the increase of EHC plans issued
S5	Contracts with Independent Specialist Provision to ensure financial discipline The framework contract limits 1% inflation to stated prices and ensure robust contract management
S6	Reduce the use of alternative provision Placements in alternative provision have increased and now match (or sometimes exceed) special school costs. Packages of support in mainstream settings would be a less costly alternative and will ensure children remain in mainstream settings.
S7	Increase funding to mainstream settings for children with EHC plans Through proposed trials with school consortia from the Impower review, more children should be supported to stay in mainstream settings, reducing costs from specialist placements.
S8	Supported internships By increasing the number supported internships and ensuring they find employment we can achieve positive outcomes for the young person, the end of an EHC plan and savings for adult social care.
S9	Service reviews (LA services funded by DSG) The remaining services delivered or commissioned by the LA from DSG to be reviewed to ensure value for money
S10	Review the special school funding matrix Review current funding allocations to different types of specialist provision, within the same funding envelope. Cost neutral.

S11	Joint commissioning Ensuring that we work with our partners so that the system delivers value for money
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Please discuss the local circumstances that have contributed to your deficit. Please provide a brief summary of the pressures in the box
A) mainstream schools; B) state-funded special schools,
C) further education and sixth form colleges,
D) independent specialist provision; E) alternative provision

P1	Increase in number of EHC plans, particularly at aged 16-25 (school age has risen by 0.1%); coupled with population growth, with a further 68,000 homes to be built in the County over the next 10 years
P2	Disproportionate increases in placements in state-funded specialist provision.
P3	Higher than average placements in independent specialist provision at school age (although this has been reducing).
P4	Increased use of alternative provision as part of a package for children with SEND.

Please provide any further detail here if required, including any attachments that support your recovery plan and any disapplication reference number.

Contact Name	Duane Chappell
Job Title	SEND & Inclusion: Strategy & Commissioning Manager
Email address	duanechappell@warwickshire.gov.uk
Date	

DSG Deficit Recovery Plan

Ref.	Block	Type of provision e.g. special schools	Action e.g. increasing special school places	Year 1	Year 2	Year 3	Year 4	Year 5	
				2019-20	2020-21	2021-22	2022-23	2023-24	2024-25
				£	£	£	£	£	
DSG Balance b/f				-	5,240,375	11,587,787	20,144,548	30,895,424	42,275,380
Savings (figures should be entered as negative values)									
S1	High Needs	Resourced Provision	Capital investment in new or expanded special units / resourced provision		(201,478)	(521,331)	(776,275)	(771,219)	(757,333)
S2	High Needs	Special Schools	Capital investment in new, expanded or adapted special schools		0	(849,765)	(2,323,638)	(3,600,036)	(3,849,563)
S3	High Needs	Early Years and Mainstream High Needs Provision	Other		10,482	213,546	(117)	(249,359)	(555,257)
S4	High Needs	Align growth in EHC plan with other local authorities	Active engagement of local schools and colleges in designing services and provision		0	(278,952)	(640,977)	(1,163,528)	(1,804,694)
S5	High Needs	Independent Placements	Active engagement of independent / non-maintained providers in designing services and provision		(32,186)	(64,013)	(90,836)	(107,277)	(129,238)
S6	High Needs	Alternative Provision	Active engagement of local schools and colleges in designing services and provision		0	(705,906)	(709,261)	(704,574)	(705,032)
S7	High Needs	Mainstream schools	Increased resource for mainstream schools – targeted funding		0	0	0	0	0
S8	High Needs	Post 16 (Further Education) - Supported Internships	Active engagement of local schools and colleges in designing services and provision		(485,862)	(587,769)	(743,287)	(922,680)	(1,052,878)
S9	High Needs	Service Reviews	Other						
S10	High Needs	Special School Funding	Other						
S11	High Needs	Joint Commissioning	Other						
Total savings				0	(709,045)	(2,794,190)	(5,284,391)	(7,518,673)	(8,853,994)
Pressures (figures should be entered as positive values)									
P1	High Needs	Independent Placements	Higher parental expectations		3,732,636	4,024,171	4,987,671	5,385,936	5,850,978
P2	High Needs	Special Schools	Pressure on maintained special school capacity		4,080,418	4,548,455	6,086,654	7,099,277	8,110,289
P3	High Needs	Early Years and Mainstream High Needs Provision	Increase in the number of EHC Plans		4,390,914	5,112,429	7,104,685	8,473,712	9,885,036
P4									
Additional Pressures (figures should be entered as positive values)				0	12,203,968	13,685,055	18,179,010	20,958,925	23,846,303
Cost reductions from impact of recovery plan				0	11,494,923	10,890,865	12,894,619	13,440,251	14,992,309
Total DSG forecast overspend									
Net in year impact on High Needs DSG				0	11,494,923	10,890,865	12,894,619	13,440,251	14,992,309
Estimated High Needs Block change (additional grant)					(5,147,510)	(2,334,104)	(2,143,744)	(2,060,295)	(2,016,445)
Approved transfer of schools block to HN block				0	0	0	0	0	0
Other adjustments					0	0	0	0	0
Net in year Forecast Outturn Variance				0	6,347,412	8,556,761	10,750,875	11,379,957	12,975,863
DSG Balance – show a deficit as a positive value				5,240,375	11,587,787	20,144,548	30,895,424	42,275,380	55,251,244
				DEFICIT	DEFICIT	DEFICIT	DEFICIT	DEFICIT	DEFICIT

Key
User entry required

*2019/20 deficit is after the WCC contribution of £2.103m agreed in January 2019 prior to changes in terms & conditions

Education, Health and Care Plans

	Number of CYP with Statements/ EHCPs	Total HNB	Outturn	Variance	Cumulative
2016	2963				
2017	3260	£41,787,000	£42,651,000	£864,000	£864,000
2018	3509	£42,984,000	£45,087,000	£2,103,000	£2,967,000
2019	3848	£50,322,000	£52,778,000	£2,456,000	£5,423,000
2020	4299	£50,556,000	£57,899,000	£7,343,000	£12,766,000
2021					

	2016	% against total	2017	% against total	2018	% against total	2019	% against total	2020	% against total	2021
Under Age 5	63	2%	61	2%	194	6%	117	3%	138	3%	
Aged 5-10	1045	35%	1042	32%	1151	33%	1094	28%	1196	28%	
Aged 11-15	1327	45%	1259	39%	1342	38%	1353	35%	1432	33%	
Aged 16-19	499	17%	796	24%	730	21%	1079	28%	1111	26%	
Aged 20-25	29	1%	102	3%	92	3%	205	5%	422	10%	
Total	2963	100%	3260	100%	3509	100%	3848	100%	4299	100%	0

Appendix C: DSG Sustainability Plan

High Needs Forecast

*2019/20 Cumulative
includes WCC contribution of
£2.103m

1. Baseline Model - "As is"

Annual Forecast Under/(Over)
Spend

Cumulative Overspend

£(000)								
2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28
(£7,343.4)	(£7,056.5)	(£11,351.0)	(£16,035.3)	(£18,898.6)	(£21,829.9)	(£23,138.7)	(£23,469.5)	(£24,627.8)
(£5,240.4)	(£12,296.8)	(£23,647.8)	(£39,683.0)	(£58,581.7)	(£80,411.5)	(£103,550.3)	(£127,019.8)	(£151,647.5)

2. Annual Intervention Savings

1. Resourced Provision

2. Special School & Pears

3. Increase EHCP in Early Years

4. Align growth of EHC plans in
line with statistical neighbours

5. Inflation on ISP Res reduce
at 1%

6. Reduce in the use of AP

7. Increase the number of
internships

Annual Savings

Sustainability reduction as %
from Baseline

£(000)								
2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28
£0.0	£201.5	£521.3	£776.3	£771.2	£757.3	£732.7	£646.3	£583.0
£0.0	£0.0	£849.8	£2,323.6	£3,600.0	£3,849.6	£4,075.1	£4,186.0	£4,329.5
£0.0	(£10.5)	(£213.5)	£0.1	£249.4	£555.3	£796.0	£892.0	£979.0
£0.0	£0.0	£279.0	£641.0	£1,163.5	£1,804.7	£2,622.3	£3,478.7	£4,557.3
£0.0	£32.2	£64.0	£90.8	£107.3	£129.2	£137.2	£136.5	£156.4
£0.0	£0.0	£705.9	£709.3	£704.6	£705.0	£702.4	£666.0	£633.0
£0.0	£485.9	£587.8	£743.3	£922.7	£1,052.9	£1,137.6	£1,206.1	£1,294.8
£0.0	£709.0	£2,794.2	£5,284.4	£7,518.7	£8,854.0	£10,203.3	£11,211.5	£12,532.9
0%	-10%	-25%	-33%	-40%	-41%	-44%	-48%	-51%

£(000)

3. Impact to forecast after interventions

	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28
Annual Forecast Under/(Over) Spend	(£7,343.4)	(£6,347.4)	(£8,556.8)	(£10,750.9)	(£11,380.0)	(£12,975.9)	(£12,935.5)	(£12,258.0)	(£12,094.9)
Cumulative Overspend	(£5,240.4)	(£11,587.8)	(£20,144.5)	(£30,895.4)	(£42,275.4)	(£55,251.2)	(£68,186.7)	(£80,444.7)	(£92,539.6)

Annual Incremental Saving

£0.0	£705.9	£3.4	(£4.7)	£0.5	(£2.7)	(£36.4)	(£33.0)
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Description of interventions

Intervention	Description
1. Continued increase in Resourced Provision capacity and utilisation	Placements currently in special schools could be catered for in Resourced Provision, creating capacity in special schools and reducing the need for higher costs independent specialist placements
2. Increase in special school capacity at the Pears site	The 80 place provision for ASD/SEMH needs will reduce need for higher costs independent specialist placements
3. Increase the timeliness of EHC plans issued in early years (ages 0-4)	By ensuring package of support are in place earlier, the demand for special school (more costly) places in Reception Year and Year 1 should be reduced.
4. Align increase in EHC plans with statistical neighbours (eg. Review current SEND Guidance and clarify thresholds for panel decision-making)	Assumed reduction in requests for assessment and fewer placements to be made in specialist provision (state-funded and specialist)
5. Contracts with Independent Specialist Provision to ensure financial discipline	The framework contract limits 1% inflation to stated prices and ensure robust contract management
6. Reduce the use of alternative provision	Placements in alternative provision have increased and now match (or sometimes exceed) special school costs. Packages of support in mainstream settings would be a less costly alternative and will ensure children remain in mainstream settings.

7. Invest to save in supported internships quality assurance	By increasing the number supported internships and ensuring they find employment we can achieve positive outcomes for the young person, the end of an EHC plan and savings for adult social care.
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Further interventions (currently unable to forecast savings):

- **Increase funding to mainstream settings for children with EHC plans:** Through proposed trials with school consortia from the Impower review, more children should be supported to stay in mainstream settings, reducing costs from specialist placements.
- **Service reviews (LA services funded by DSG):** The remaining services delivered or commissioned by the LA from DSG to be reviewed to ensure value for money. Other services may be reviewed to ensure that the system put financial incentives in the right place.
- **Review the special school funding matrix:** Review current funding allocations to different types of specialist provision, within the same funding envelope. Cost neutral.
- **Joint commissioning:** Ensuring that we work with our partners so that the system delivers value for money.

Appendix D - Warwickshire County Council Equality Impact Assessment (EIA) Form

The purpose of an EIA is to ensure WCC is as inclusive as possible, both as a service deliverer and as an employer. It also demonstrates our compliance with Public Sector Equality Duty (PSED).

This document is a planning tool, designed to help you improve programmes of work by considering the implications for different groups of people. A guidance document is available [here](#).

Please note that, once approved, this document will be made public, unless you have indicated that it contains sensitive information. Please ensure that the form is clear and easy to understand. If you would like any support or advice on completing this document, please contact the Equality, Diversity and Inclusion (EDI) team on 01926 412370 or equalities@warwickshire.gov.uk

Service / policy / strategy / practice / plan being assessed	Dedicated Schools Grant (DSG) Recovery Plan
Business Unit / Service Area	Education Services, SEND & Inclusion
Is this a new or existing service / policy / strategy / practice / plan? If an existing service / policy / strategy / practice / plan please state date of last assessment	New (Some activities included in SEND & Inclusion Strategy assessed in March 2019)
EIA Review team – list of members	Jane Carter, Ross Caws, Duane Chappell
Do any other Business Units / Service Areas need to be included?	No (to be picked up within individual projects)
Does this EIA contain personal and / or sensitive information?	No
Are any of the outcomes from this assessment likely to result in complaints from existing services users, members of the public and / or employees?	If yes please let your Assistant Director and the Customer Relations Team know as soon as possible

1. Please explain the background to your proposed activity and the reasons for it.

The local authority is required to submit a Dedicated Schools Grant (DSG) Recovery Plan to the Department for Education. This is due to the overspend of the DSG being more than 1% in 2019/20, primarily due to overspend of £7.34m in the High Needs Block in 2019/20. The High Needs Block is for learners with Special Educational Needs and/or Disabilities (SEND).

The High Needs Block is the funding source for provision in Education, Health and Care plans, including the cost of the school placement. It is also the source of funding for some services provided by the Council for children with disabilities.

The DSG Recovery Plan for 2020/21 must be submitted to the DfE 'as and when requested'. The DSG Recovery Plan is to cover the period April 2020 – March 2023 to show how overspend from 2019/20 will be recouped.

2. Please outline your proposed activity including a summary of the main actions.

The 11 actions identified in the DSG Recovery Plan are below. All activity must be in accordance with the SEND Regulations 2014 and the SEND Code of Practice 2015. The DSG Recovery Plan forms part of a wider SEND & Inclusion Change Programme which brings together activities for cultural change as delivery of statutory duties.

1) Continued increase in Resourced Provision capacity and utilization

Placements currently in special schools could be catered for in Resourced Provision, creating capacity in special schools and reducing the need for higher costs independent specialist placements

2) Increase in special school capacity at the Pears site

The 80 place provision for ASD/SEMH needs will reduce need for higher costs independent specialist placements"

3) Increase the timeliness of EHC plans issued in early years (ages 0-4)

By ensuring package of support are in place earlier, the demand for special school (more costly) places in Reception Year and Year 1 should be reduced.

4) Align growth in EHC plans with statistical neighbours and population increase (eg. Review current SEND Guidance and clarify thresholds for panel decision-making)

Assumed reduction in requests for assessment and slow-down in the increase of EHC plans issued

- 5) **Contracts with Independent Specialist Provision to ensure financial discipline**
The framework contract limits 1% inflation to stated prices and ensure robust contract management
- 6) **Reduce the use of alternative provision**
Placements in alternative provision have increased and now match (or sometimes exceed) special school costs. Packages of support in mainstream settings would be a less costly alternative and will ensure children remain in mainstream settings.
- 7) **Increase funding to mainstream settings for children with EHC plans**
Through proposed trials with school consortia from the Impower review, more children should be supported to stay in mainstream settings, reducing costs from specialist placements.
- 8) **Supported internships**
By increasing the number supported internships and ensuring they find employment we can achieve positive outcomes for the young person, the end of an EHC plan and savings for adult social care.
- 9) **Service reviews (LA services funded by DSG)**
The remaining services delivered or commissioned by the LA from DSG to be reviewed to ensure value for money
- 10) **Review the special school funding matrix**
Review current funding allocations to different types of specialist provision, within the same funding envelope. Cost neutral.
- 11) **Joint commissioning**
Ensuring that we work with our partners so that the system delivers value for money

3. Who is this going to impact and how? (customers, service users, public and staff)

It is good practice to seek the views of your stakeholders and for these to influence your proposed activity. Please list anything you have already found out. If you still need to talk to stakeholders, include this as an 'action' at the end of your EIA. **Note that in some cases, there is a duty to consult, see [more](#).**

The DSG Recovery Plan has been informed by:

- an external review of SEND by Impower
- SEND & Inclusion Strategy
- work over four years with the SEND & Inclusion Board and Workstreams, consisting of key strategic partners across education (including schools, EY and FE settings), health, social care, the Parent Carers Forum;
- recommendations from the Warwickshire High Needs Task and Finish Group

- experiences of other local authorities
- national reports from LGA, NAO, County Council Network and Parliamentary Committees

In terms of stakeholder engagement to date, the actions fall into three groups:

1. Activities derived from the Warwickshire SEND & Inclusion Strategy (ref 1,2,8,11) were consulted upon during November and December 2018. There were two online surveys: one for learners and one for parents, carers, staff, professionals and other stakeholders. The consultation was promoted through social media, by leaflets being shared with all schools and settings and through the Ask Warwickshire consultation hub. In total 274 responses to the survey were received, of which 145 were parents, 88 were staff and 41 were any other type of respondent. 88 young people responded to the learner's survey. Following this, the consultation analysis was considered by:
 - A workshop of head teachers
 - A workshop with the parent carer forum
 - Five workstream stakeholder meetings (representatives of education, schools, health, social care and parents/carers)
2. Additional activities (ref 5) from recommendations from the Warwickshire High Needs Task and Finish Group (school representatives) have been reviewed by stakeholders on the SEND & Inclusion Board (representatives from schools, health services, social care, Parent Carer Forum) and Schools Forum.
3. New activities (ref 3,4,6,7,9,10) have been reviewed by Schools Forum. Further review by stakeholders on the SEND & Inclusion Board is to occur on 1 July 2020 (representatives from schools, health services, social care, Parent Carer Forum).

We will continue to engage with stakeholders as each project is taken forward. The main mechanism for monitoring this is the SEND & Inclusion Board with representation from schools, health services, social care, education, and Parent Carer Forum.

4. Please analyse the potential impact of your proposed activity against the protected characteristics.

N.B Think about what actions you might take to mitigate / remove the negative impacts and maximize on the positive ones. This will form part of your action plan at question 7.

	What information do you have? What information do you still need to get?	Positive impacts	Negative impacts
Age	By law the SEND Regulations cover the age group 0-25. There is age data on all EHC plans by age.	Children in early years (0-4) are more likely to have to have their provision formalized in a legal document (EHC plan) Young people with SEND aged 16-25 are to be supported into employment through the supported internships project.	None. It is clear in the SEND regulations that EHC plans can only be ceased once the outcomes of the plan have been met or when the young person turns age 25.
Disability Consider <ul style="list-style-type: none"> • Physical disabilities • Sensory impairments • Neurodiverse conditions (e.g. dyslexia) • Mental health conditions (e.g. depression) • Medical conditions (e.g. diabetes) 	All learners with an EHC plan will have identified special educational needs and/or disabilities.	The DSG Recovery Plan is based on inclusion through earlier identification and response to SEND. The intention is that by changing current practice, the incentives in the system should support early identification and intervention. This should lead to more children being educated in	There is likely to be a perceived negative impact from parents and schools as systems and services change. With each project it will be important to demonstrate how statutory requirements are being met.

		<p>mainstream or state-funded specialist settings, closer to home and with their peers. As a result needs should be managed earlier, avoiding escalation, and avoiding higher costs.</p> <p>The evidence for inclusion in mainstream settings is set out in the Warwickshire SEND & Inclusion Strategy 2019-2023.</p>	<p>Early intervention will require both system change (release of resources) and cultural change (building confidence and skills in settings to meet learner needs).</p> <p>Service reviews should have further equality impact assessments on any resulting recommendations for service redesign.</p> <p>A communications strategy is required to make clear the intentions of each project and how stakeholder engagement will be achieved.</p>
Gender Reassignment	Data not held.	None	None
Marriage and Civil Partnership	Data not held.	None	None
Pregnancy and Maternity	Data not held.	None	None
Race	Data is not collected by SEND. Action must be taken (below) to ensure data must be triangulated with other datasets to identify any negative impact.	Neutral (subject to further analysis)	Neutral (subject to further analysis)
Religion or Belief	Data not held.	None	None

Sex	Data held. Qualitative evidence highlights a particular issue regarding girls with autism often not being identified.	The DSG Recovery Plan is based on inclusion through earlier identification and response to SEND.	None
Sexual Orientation	Data not held.	None	None

5. What could the impact of your proposed activity be on other vulnerable groups e.g. deprivation, looked after children, carers?

The DSG Recovery Plan is based on inclusion through earlier identification and response to SEND. As a result, SEND learners who have other vulnerabilities should be positively impacted on, by inclusion in their local settings.

The profile of looked after children with EHC plans can be monitored through SEND reporting (action below). Feedback from carers can also be measured through survey feedback (also see action below).

As noted above, service reviews should have further equality impact assessments on any resulting recommendations for service redesign.

6. How does / could your proposed activity fulfil the three aims of PSED, giving due regard to:

- the elimination of discrimination, harassment and victimisation
- creating equality of opportunity between those who share a protected characteristic and those who do not
- fostering good relationships between those who share a protected characteristic and those who do not

[The Warwickshire SEND & Inclusion Strategy 2019-2023](#) sets out the evidence for inclusion – ensuring that children and young people with SEND are, as far as possible, educated with their peers without SEND in their local school. If specialist provision is

required, this should also be close to home. Each EHC plan should be personalised to the learner, to ensure that the learner is supported to achieve outcomes important to them. This is consistent with the SEND Code of Practice 2015.

7. Actions – what do you need to do next?

Consider:

- Who else do you need to talk to? Do you need to engage or consult?
- How you will ensure your activity is clearly communicated
- Whether you could mitigate any negative impacts for protected groups
- Whether you could do more to fulfil the aims of PSED
- Anything else you can think of!

Action	Timescale	Name of person responsible
Gather and analyse local data on EHC plans by ethnicity.	July 2020	SEND Strategy and Commissioning Lead (Ross Caws)
Feedback from carers can also be measured through survey feedback	Use existing surveys (EHC Plan Survey October-November 2019); and ensure an update survey during September 2020-July 2021; Continued engagement with Parent Carer Forum	SEND Strategy and Commissioning Lead (Ross Caws)
The profile of looked after children with EHC plans can be monitored through SEND reporting	To be set up as a report, and reported in accordance with the agreed performance dashboard	SEND Strategy and Commissioning Lead (Ross Caws)
A communications strategy is required to make clear the intentions of each project and how stakeholder engagement will be achieved.	July-September 2020	SEND Strategy and Commissioning Lead (Ross Caws)

Service reviews should have further equality impact assessments on any resulting recommendations for service redesign.	When service review reports recommendation (across September 2020-July 2021)	SEND Strategy and Commissioning Lead (Ross Caws)
This EqIA to be checked and updated as required following the scoping of each cohort of projects	Expected by end September 2020	SEND Strategy and Commissioning Lead (Ross Caws)

8. Sign off.

Name of person/s completing EIA	Ross Caws, Jane Carter, Duane Chappell
Name and signature of Assistant Director	Ian Budd
Date	01/07/2020
Date of next review and name of person/s responsible	Ross Caws, Duane Chappell