

Summary of responses as at 90 days: Final Position**Introduction**

This briefing is intended to provide a summary position statement based on cumulative information at the end of the formal consultation. It provides a picture of views received from staff across the directorate and beyond including partners, schools and settings. By its nature the summary will not cover all aspects of feedback but will present the views and comments most represented from the feedback received under thematic headings, including a specific section focusing on feedback received in the 80-90 day period, with commentary on adjustments made to original proposals based on feedback received.

The table below shows total numbers of responses received, by format and source, throughout the full 90 days.

	Questionnaires			Email/letters	Total	Anonymous comment
Learning	64		ASK	70	134	
			Operations	23	23	
CAP	19		Commissioning	25	44	
SCS	20		CSS	6	26	
RAP	2		Finance	3	5	
CPIG	2		Resources	1	3	
Schools	26		Schools	18	44	
Settings	6		Settings	15	21	
Partners	5		Partners	18	23	
			Parents	1	1	
Total					324	
Total	144			180		32
Total	356					

Consultation Feedback:

Early Years

One of three areas to have received the greatest level of feedback was Early Years. Respondents felt that the proposals could lead to many perceiving that the skilled professional support for Early Years settings was being downgraded and concern was expressed around the potential loss of expertise. Many respondents felt that the proposed generic Early Years role would dilute specialisms and lead to a “one size fits all” model. Concern was expressed at the loss of the SENCO with a number of those replying feeling that this would threaten the Local Authority’s ability to identify vulnerable young children at an early stage and provide the support to them and to their families at the earliest possible point as well as ensuring a smooth transition into school. It is suggested in a number of responses that the loss of the Early Years SENCO could affect the ability to work effectively with Health colleagues to support families of very young children.

In addition, there is a request for reconsideration of the proposed change from the current status of Early Years staff on Teachers terms and conditions to the Kent Scheme. Respondents have voiced strong concern over the Authority’s ability to retain and recruit a sufficiently high calibre of staff if this proposal is implemented.

SMT has given serious consideration to all the points raised and as a result have now raised the grade for the proposed Early Years Adviser posts from KR10 to KR11 in order to bring the salary range in line with that currently received by Early Years SENCOs and to ensure a greater parity of salary between School Teaching and Learning Advisers and Settings Advisers. They recognise that this does not address the change in terms and conditions and are clear that the reason behind the proposed change from Teachers terms and Conditions to Kent Scheme, is that Kent Scheme enables all year round work with settings as the majority do not operate on a term time only basis and need to be able to access advice and support at any point in the year.

The new Early Years role will be suitable for candidates from a range of backgrounds who can bring a range of skills to the overall team. It is hoped that a proportion of the posts will be taken up by those with SENCO expertise, with others bringing a range of specialist skills and expertise to remaining posts in the team.

Further adjustments have been made resulting in changes to the line management in original proposals for the following teams and roles following staff discussions with managers and work around bringing certain functions embedded within teams together into central teams:

The Children and Families Information Service has been moved back to report to the Head of Early Years and Childcare.

The Childcare Business Hub Coordinator has been moved to the Early Years Market development team.

A number of administrative support roles in the Early Years and Childcare team have been reallocated to ensure appropriate support across teams.

Two early Years Marketing and Communications posts have been moved from the Early Years Market Development team to the CFE Communications team.

School Improvement Partners and Advisers (now District Head of Primary Standards and School Improvement -previously Senior SIP – Primary, Primary Standards and School Improvement Partner -previously Primary SIP and District Head of Secondary Standards and School Improvement – Previously Senior SIP – Secondary)

The area registering the second largest number of responses was that of Senior School Improvement Partners, School Improvement Partners and Advisers.

Roles and responsibilities:

Respondents felt that although they had more information provided around the new role of the SIP and Senior SIP they would benefit from more detail, particularly around county-wide responsibilities and leadership development. They still felt unclear how work around leadership would link to standards in the proposals and where current SIP duties will be redirected. There was a perception that the SIP role would be an inspection rather than a support role. This was seen as punitive in focus, and there was concern as to how schools would access support.

Greater clarity was requested around the management reporting lines for the 24 Teaching and Learning Advisers.

Fears were expressed over the removal of specialist support currently provided by the Subject Specialists, and the resulting loss of expertise in developing Local Authority statements of action for schools in category.

There was concern that the Advisory Headteacher team was being reduced at a time when Kent has an increasing number of schools in category and a high number of Headteacher vacancies.

Recruitment was seen as a potential issue for the SIP and Adviser roles. Respondents indicated that Schools currently pay Assistant Headteachers more than the proposed scale for Advisers. Kent's previous difficulty with recruitment to SIP posts is referred to, with respondents foreseeing further difficulty in recruiting the proposed twelve secondary SIPs.

County-wide responsibilities for Senior SIP posts will not be determined until the team is in place and the experience, skills and interests of team members can be taken into account.

The originally proposed Senior SIP and SIP roles will be very different from that currently undertaken by School Improvement Partners. The role is not about inspection, it is about support and challenge – being a “critical friend” to the schools he/she will be working with. The job titles have been changed to: District Head of Primary Standards and School Improvement (previously

Senior SIP – Primary), Primary Standards and School Improvement Partner (previously Primary SIP) and District Head of Secondary Standards and School Improvement (previously Senior SIP- Secondary) to reflect the breadth of this new role. The salary range for these posts has also been increased to reflect the concerns around salary levels and to make them more equitable to salary levels in many Kent schools. This salary increase has meant that there has had to be a corresponding increase to the salary levels of the Head of Standards and School Improvement, the Principal Adviser Primary Standards and the Principal Adviser Secondary Standards.

The number of District Head of Secondary Standards and School Improvement posts (previously Senior SIP –Secondary) has been adjusted following a closer analysis of the number and needs of schools and is 6 rather than 12 – each post covering two Districts.

We have also increased the number of Secondary Teaching and Learning Adviser posts from 8 to 10 following concerns around the original proposed number. We will be looking for a balance of Core subject specialists amongst post holders covering the Secondary phase but will be focusing on recruiting individuals with excellent all round teaching and learning skills to work with Kent Primary schools.

The Teaching and Learning Advisers will be managed within Districts by the District Heads of Primary/Secondary Standards and School Improvement and will be allocated to the Districts according to the needs of schools.

The person specifications have been adjusted to include those who “are willing to become SIP accredited”.

Allocation:

Questions were asked as to how schools would be allocated to District Heads of Primary/Secondary Standards and School Improvement and Primary Standards and School Improvement Partners (previously SIPS and Senior SIPs) to reflect the diverse nature and needs of Kent schools. Concerns were raised at the proposed levels of Teaching and Learning Advisers and a request made to reconsider the number currently proposed.

The number of District Heads of Primary/Secondary Standards and School Improvement and Primary Standards and School Improvement Partner posts in each District will reflect the level of need and the number of schools allocated to each postholder will reflect the levels of support required by the schools e.g. a Primary Standards and School Improvement Partner with a higher proportion of more vulnerable schools will have a lower number of schools allocated to him/her.

The number of Secondary Teaching and Learning Adviser posts has been increased from 8 to 10 (see comments above).

Capacity:

There was concern expressed at the ability of schools to implement the “schools supporting schools” model without some support from the Local Authority to aid this transition. Some felt that schools would not have the capacity to provide specialist support and advice for the Local Authority and to other schools and efforts to do so would detract from the time teachers have for main duties around teaching and learning in their own school.

The Authority is investigating the possibility of setting up a “traded Services” unit for the future, given the direction of government policy in relation to schools and to ensure that sufficient capacity exists to address Kent schools needs. This will be discussed with schools as part of a bigger discussion around the future relationship between the local authority and Kent schools, commencing with sessions being held this month that will involve Paul Carter and Sarah Hohler as well as Rosalind Turner and other members of SMT.

Part of the role of the District Heads of Primary/Secondary Standards and School Improvement and Primary Standards and School Improvement Partners will be to support the development of the “schools supporting schools” model.

Perceived Centralisation; effects on Partnership working;

The proposals for line management accountability to rest with Heads of Service, although retaining local deployment were seen by many as “centralisation”. Concerns were raised as to how integrated working would operate on the ground with reporting lines through to the strategic centre. Many felt that “silos” would operate and that current strong working relationships would be threatened. A number felt that the current approach was working well and did not need to be changed.

There is a perceived danger by some respondents that increased uniformity could decrease local differentiation, particularly where they felt that the size and complexity of Kent had not been taken into account. It was felt by some that this aim for consistency across the county could also contradict the aims of Total Place, one of the stated key drivers.

SMT are clear that they will expect resources and staff to be deployed locally whilst being line managed through reporting lines to the relevant Head of Service, and to be used flexibly to respond to local need but within a clear and agreed accountability framework. Work is taking place to look at the rationale for the allocation of staff and resources to Districts in a way that addresses evidenced local need.

Service managers will have the requirement to work across boundaries and to promote integrated approaches and ways of working amongst their staff written into their job descriptions and performance management targets. There will be increased accountability and a stronger performance management framework but this will not mean increased uniformity

Preventative services

Responses centred around three key areas, namely:

Capacity:

The original proposals were not felt to demonstrate staffing levels (around prevention) that reflected the need of the locality and funding resources were questioned. Concerns were raised around local preventative services currently funded by sources which are likely to cease.

SMT have acknowledged that this was a gap and have looked at this issue alongside the comments made about the proposed Service Integration Manager role (see below). The proposals have been adjusted to remove the proposed 12 Service Integration Managers reporting to a Head of Partnerships (also now removed) within the Commissioning and Partnerships Group, and to have 12 Preventative Services Managers locally deployed across the 12 districts, reporting through to the 3 Heads of Children's Services within Specialist Children's Services. The administrative support previously allocated to the SIM roles has been transferred across to support the Preventative Services Manager posts.

These roles will directly manage Children's Centres, district based Family Liaison Officers and Parent Support Advisers plus CAF Coordinators and administrators and the varied project and programme based roles (the majority grant funded) established in the current Local Children's Services Partnerships. The Preventative Services Managers will take the lead on the operational coordination and delivery of preventative services across a District, including coordination of CAF. They may not have all the relevant elements brought together in their team from the start but elements of preventative services currently located and managed elsewhere, once identified, can be brought together under their management and direction through negotiation and consultation with relevant staff and managers. They will play a key role in coordinating and working closely with other services that are key contributors to prevention and early intervention in a district

A considerable number of Preventative services are currently funded via government grant, whether that is currently through KCC CFE or other partners e.g Health, District Councils etc. A scoping, evaluation, prioritisation and risk assessment exercise is currently underway in order to have discussions with our partners and to inform options for the delivery of preventative services once more information is available around new government spending decisions. It is expected that the proposed Preventative Services Managers will play a pivotal role in influencing and implementing any decisions in this area of service.

Structures:

The original structural proposals around prevention were criticised by respondents who felt that they could not see how swift and flexible services could be deployed around the child and family and felt that there was a lack of a local cohesive and locally managed team to respond swiftly and flexibly in the original proposals.

(please see above: Preventative Services Managers and team as a response to this concern)

Assessment and intervention:

More clarity was requested around how prevention and early intervention would be led at a local level, who would lead on CAF, Single Point of Access and Partnership based review.

(please see above: Preventative Services Managers and team as a response to this concern)

Prevention

Some respondents were uncomfortable with preventative services coming under the Specialist Children's Services Group. Reasons cited included: concern around the preventative agenda being seen as led by social care professionals and the perception that vulnerable families may be deterred from engaging.

It was also felt that there was a danger that resources targeted at prevention would instead be swallowed up by the higher levels of need. The suggestion was for a preventative team led by a District Manager equivalent with ring fenced resources. This function should work closely but separately to the social care workforce.

(please see above: Preventative Services Managers and team as a response to this concern)

Concern was also expressed at the proposed deletion of the Extended Schools Development Manager posts and the impact on service development and relationships with partner agencies.

In light of these comments the structure has been amended to include some temporary grant funded Extended Services posts (to March 2011) that will provide transitional capacity and will focus on building sustainability. Preventative Services Managers and District Heads of Primary/Secondary Standards and School Improvement and Primary Standards and School Improvement Partners will, as part of their induction, gain an understanding of the Extended Services agenda. Extended Services Co-ordinators will remain until the end of grant funding (August 2011) reporting through to three of the central Extended Services posts, so ensuring further operational capacity. All will work very closely with district based officers to ensure that their work is appropriately targeted.

Learning - standards versus ECM

Respondents have registered their concern at the apparent strength of focus around standards in the Learning Group to the perceived detriment of the Every Child Matters agenda. Staff and schools alike have stated that the structure needs to take a more holistic view and reflect the Learning Group's function to meet the needs of all children and young people in relation to ECM.

This comment has been noted. It is not the intention of the Learning group to focus on Standards to the detriment of the Every Child Matters agenda.

Top Heavy

A significant number of comments centred round a perceived increase in additional and unnecessary management layers. Responses signalled a desire for a flatter structure which moves away from too many managers and too centralist a hierarchy.

The management of the majority of staff will sit in the districts. Some senior management posts that were in the original proposals have been deleted, for example the Head of Partnerships in the Commissioning and Partnerships group.

Administrative and business support

The proposed wide ranging reductions made to numbers of administrative staff have exercised many, greatly. There is a sense that the vital function that many administrative roles play in maintaining front-line service delivery has been overlooked and that their removal poses a very real threat to business continuity. For some teams their administrative colleagues are seen as 'frontline' and are the first point of contact for families, schools, settings and partner agencies.

SMT recognise the concerns raised by many around this issue. An exercise undertaken across the whole of KCC prior to the drawing up of these proposals identified that we do have administrative resource levels that are higher than comparative local authorities and that we needed to address this. We need to ensure that we are targeting our administrative resources where they are most needed and that we are equipping staff with the skills and tools to be able to support themselves efficiently wherever possible. Further work has been undertaken to provide more clarity around the structural proposals for business support and administrative staff, particularly in the Learning group and in a number of areas posts have been reallocated across teams and in some cases, administrative posts have been increased in number from original proposals.

We recognise that we have not tackled the lack of consistency in administrative support structures and grades across CFE in this current reorganisation and expect that some further adjustments will have to be made when we face the next phase of change once the direction and policy decisions of our new government have been announced in more detail.

In addition, intentions around accommodation in the longer term are for all staff to be co-located at County Hall and twelve district bases.

Short to medium term plans for accommodation are reflected in the current structure proposals. We are aware that Kings Hill is closing in December and staff whose base is identified as Kings Hill are being consulted with as their final base is yet to be determined.

Service Integration Manager

A number of respondents felt that the Service Integration Manager role and title was unintelligible to non CFE based staff. It was not felt to convey any sense of work with either children and families or schools.

Grave concerns were expressed about the nature of the role which was seen as lacking clarity. It was described as “an impossible task” due to its lack of line management responsibility and inability to direct resources.

(please see Prevention Services manager proposal)

The SIM post has been removed from the structure with the functions now split between the Preventative Services Managers (in Specialist Children’s Services), Commissioning Officers and the Kent Children’s Trust Manager (in Commissioning and Partnerships).

Unaccompanied Asylum Seeking Children’ Services:

Feedback around this area of service was split into two camps, those who welcomed the mainstream integration offered by the proposals and those who were quite against what they saw as the fragmentation of the service across two Heads of Service.

There was a concern that the specialist skills and knowledge to deal with UASC i.e. understanding of immigration control and legal complexities could be diluted if Reception and Assessment were made the responsibility of the Corporate Parenting team.

Equally some felt that the proposals for UASC could improve integrated approaches and processes and reduce compartmentalisation within Children’s Social Services.

Agreement with the proposals however rested on two key points

- 1) Guarantee of the specialist skills and knowledge
- 2) Taking account of the capacity within the existing mainstream CSS teams and their willingness to take on an additional client group.

The Development Manager post within the current team has been reinstated to provide capacity around the reduction of unit costs (reporting directly to the Head of Corporate Parenting) and the proposed structure has been adjusted so that the service is no longer split between two Heads of Service. The service will now report through to the Head of Corporate Parenting.

Disabled Children's Services:

A key concern in this area centred round the statutory social work element of Disabled Children's Services and the perceived potential risks of having the team managed by a non social work qualified senior manager. Those not in agreement with the proposals felt that this fragmented the accountability for safeguarding disabled children and put the level of risk for the most vulnerable group of children at what they considered to be an unacceptable level.

There was a contradictory and supportive view point offered which stated that the joining of the SEN Service with the social care services for Disabled Children would promote closer working between services and should provide the opportunity for clearer, simple and more joined up routes for parents to access support for their children.

The original proposal to bring the AEN and Resources unit (now SEN) together with Services for Disabled Children has been changed, with SEN remaining on its own as a unit with the Head of unit reporting directly through to the Director of Specialist Children's Services. The Disabled Children's Service will now report through to the Head of Children's Services for West Kent, but as an interim measure, the Disabled Children's Services team will report to the Head of Corporate Parenting until April 2011.

There will still be an expectation for these teams to work together with Health to address the issue of improving referral and access routes for families with children.

Miscellaneous

A range of queries and comments were received that were more general in nature, some of these are detailed as examples below:

Some feedback received was around what some respondents described as a deficit model, designed to react to poor performance rather than a proactive structure.

SMT are confident that the model they have put in place underpinned by accurate data and informed by local knowledge will allow pro-active deployment of support to prevent any deterioration in performance or outcomes rather than solely responding to acute needs that have progressed beyond responding to preventative action.

Greater clarity on the Local Authority's relationship with schools was requested.

Kent will continue to value a strong and supportive relationship with schools. We have started to explore with head teacher colleagues what the future relationship between the Local Authority and Schools would need to be given evolving government policy and Kent's own position in relation to this.

*Please see the document “**Changes to Original Proposals Following Consultation**” for detailed changes put into place as a result of feedback received.*

80-90 day feedback:

A great deal of the 80-90 day feedback mirrored concerns referred to in the period up to the 80 days. Respondents were referring increasingly to the change in government and asking for views and a clear vision on how the Local Authority would need to be remodelled in the light of changing policy, with an honest discussion around what KCC can and can't do in the future.

Many expressed concerns around the length of time and delays and the nature and level of support, in some cases, from their managers.

Detailed below are some summary comments under headings:

Structure

Concerns still exist around the move from the current model of service delivery within Local Children's Services partnerships.

Some respondents have drawn on their knowledge and experience of similar structures in other Authorities and although able to be more positive around how it could work in a smaller authority, still cautioned as to the suitability for Kent due to the size and variety of schools and other providers

Some of the schools responding in this period raise concerns that the proposals do not appear to reflect current government thinking – separating children's social services from education and aligning it more with health, for example.

SMT feel strongly that the new model will provide a strong framework within which can exist sufficient flexibility to utilise differing patterns of resources locally, for example around the voluntary and community sector, through other statutory partners, or through appropriate targeting of CFE staffing resource to evidenced need.

Service specific concerns

One particular area to have received a high volume of comments in this final phase of the consultation was that of governor services. Responses were received from the current team members, schools and the Kent Governor's Association.

Governor Services

Staff directly affected by the proposals were largely supportive. They felt that bringing the complimentary functions of Support and Training under one team was a sensible decision which would remove the impediment of their previous separation.

Schools and partners questioned the capacity of the new proposed service to meet the service need. They did not feel they had yet received sufficient information about

the impact of the new structure on governor support and training and had concerns around the potential impact on school standards.

There was a call from some governors for greater consideration of the role and activity of Area Education Officers and their potential to support governor training and development and a view that this should be reflected in both the structure and the AEO job description.

District Heads of Primary/Secondary Standards and School Improvement; Primary Standards and School Improvement partners

Further comment was received on the above roles. Whilst the change to full-time professional SIPs (*see new titles*) was welcomed, concerns that the reduced number would not be able to offer more than the legal minimum support for schools were raised. The allocation needs to take account of the individual needs of schools .

There was a comment on the removal of the role of the Head Teacher SIP which is seen as potentially ignoring the wealth of professional expertise available to schools gained from working closely with Heads in other schools.

Support to Governing bodies will also form part of the discussion taking place between the Local Authority and Kent Schools. Governors have a crucial role in school leadership , standards and school improvement. The role of the District Heads of Primary/Secondary Standards and School Improvement will be crucial in supporting school leadership, including governing bodies and there is no intention to cut down on governor training provided.

Previous comments cover the work that is underway to ensure that the new roles will be allocated according to the individual needs of schools.

Local and Partnership working

A number of respondents felt that the statement ‘for the first time all CFE services will be delivered locally as a whole team’ did not acknowledge the good work already going on and did nothing to value those staff out in the localities.

Roles which have operated at Partnership level are described as the “bedrock” by some respondents and it is suggested that careful management will be required to avoid a vacuum of knowledge as staff change.

Some of the partner agencies who have made a response are disappointed to see that the LCSP model, which allowed managers to deploy staff according to immediate local needs, is being replaced by a new structure which they feel may inhibit the acquisition of local knowledge.

It is acknowledged that the statement “for the first time all CFE services will be delivered locally as a whole team” was perhaps unclear. It was reflecting on the fact that the LCSP teams did not cover the whole range of services and roles across CFE, it was not meant as a reflection on the quality of work or of integration at a local level.

Business continuity is vitally important particularly at times of change. We will do our best to ensure a balance between staff who have previous local

knowledge and those who may be new to a district. Induction will include ensuring that those new to a district receive extensive background information in order to support them in their new roles.

Views of schools

A higher proportion of responses from schools were received in the final 10 days of the consultation and their feedback signalled a need to have clarity around the quality and quantity of support they could hope to receive from the Authority and the ways in which this could be accessed in the future.

Whilst there was recognition of the need for schools to move towards a model of providing each other with increased levels of support, clear points were made about their ability to do so at this time, without additional resource, support and guidance and with so little lead in.

Some expressed concerns that schools could become more isolated or would set up informal networks to counteract this and that this would lead to inconsistency across Kent.

Some schools affected by the move to district boundaries have said that they feel the proposals did not take into account the fact that young people move across district lines for their schooling and that traditionally both primary and secondary schools have developed their provision and tailored their collaboration to reflect this pool of students and where they come from. Some feel that the move to different 'districts' that some schools will experience within the new structure lessens the opportunities to work in this way.

The passing of the LCSPM and (previous structure) LEO roles is lamented by some. They raise a concern that they will not have anyone who is able to represent them or their district fully and that important issues between schools and the local education authority will be missed or only dealt with in a superficial way.

Letters were received from a number of specialist Sports Colleges voicing their concerns at the loss of the Teacher Adviser team for PE and wishing for the contribution that P.E. makes towards wider agendas to be taken into consideration.

The role of the District Heads of Primary/Secondary Standards and School Improvement is again key here for schools. It is intended that schools will be encouraged to continue with collaborative networks and that the District roles will ensure that these are linked back to the local authority. It remains to be seen how government policy will bring about changes to the nature of the relationship between schools and between schools and the local authority but we hope to start addressing this together in our joint conversations commencing this month.

To see all the detail of changes made following consultation, please refer to the document "Changes to original proposals following consultation".