

Risk ID	CRR0001	Risk Title	Safeguarding – protecting vulnerable children			
Source / Cause of risk	Risk Event	Consequence	Risk Owner	Current Likelihood	Current Impact	
<p>The Council must fulfil its statutory obligations to effectively safeguard vulnerable children in a complex and challenging environment.</p> <p>In addition, the Government's "Prevent Duty" requires the Local Authority to act to prevent people from being drawn into terrorism, with a focus on the need to safeguard children at risk of radicalisation.</p> <p>During Lockdown some children were absent from school and some partners were less visible, undertaking fewer home visits to vulnerable children, increasing demand on statutory children's services. As a result, there has been an increase in the risk to children under 5. This has introduced uncertain impacts for children's mental health and resilience and the potential for latent demand to build. We are starting to see more complex demand within the system as a result of a more complex working environment.</p>	<p>Failure to fulfil statutory safeguarding obligations.</p> <p>Failure to meet the requirements of the "Prevent Duty" placed on Local Authorities.</p> <p>Safeguarding risks are not identified to / by KCC in a timely fashion.</p> <p>Spike(s) in demand impact on robustness of controls</p>	<p>Incident of serious harm or death of a vulnerable child.</p> <p>Serious impact on vulnerable people.</p> <p>Impact on ability to recruit the quality of staff critical to service delivery.</p> <p>Serious operational and financial consequences.</p> <p>Attract possible intervention from a national regulator for failure to discharge corporate and executive responsibilities.</p>	<p>Matt Dunkley Corporate Director Children, Young People and Education (CYPE)</p> <p>Responsible Cabinet Member(s): Sue Chandler, Integrated Children's Services</p> <p>Shellina Prendergast Education and Skills</p> <p>Mike Hill (Lead Member for PREVENT)</p>	<p>Likely (4)</p> <p>Target Residual Likelihood Possible (3)</p>	<p>Major (5)</p> <p>Target Residual Impact Major (5)</p>	

Control Title	Control Owner
Active strategy in place to attract, recruit and retain social workers through a variety of routes with particular emphasis on experienced social workers.	Sarah Hammond, Director of Integrated Services (Children's Social Work Lead) / Amanda Beer, Corporate Director People and Communications
Kent Safeguarding Children Multi Agency Partnership (KSCMP) arrangements in place, replacing the previous Kent Safeguarding Children Board. Includes a Scrutiny and Assurance Framework, which is working with partners to address service visibility and demand issues.	Matt Dunkley Corporate Director (CYPE) / David Whittle, Director SPRCA
Children's Assurance Board established to give assurance to the rest of the council, including safeguarding arrangements. Includes review of qualitative audit information and triangulates with quantitative picture	Matt Dunkley Corporate Director (CYPE)
Consistent scrutiny and performance monitoring through Divisional Management Team, "Performance, Challenge and support" meetings and audit activity.	Matt Dunkley Corporate Director (CYPE) / Sarah Hammond, Director of Integrated Services (Children's Social Work Lead)
Multi agency Crime and Sexual Exploitation Panel (MACSE) provides a strategic, county wide, cross agency response to CSE	Matt Dunkley Corporate Director (CYPE)
A revised Elective Home Education policy approved that includes interaction with children where there are welfare concerns and where other agencies have been involved with the family. Awareness raising taking place with other practitioners.	Craig Chapman, Head of Fair Access / Christine McInnes, Director of Education
Introduction and appointment of independent scrutineer as part of multi-agency safeguarding children arrangements	David Whittle, Director SPRCA
Communities of Practice introduced during the Covid-19 pandemic, offering support for practitioners, with over 100 practitioners attending weekly	Kevin Kasaven, Assistant Director Safeguarding and Quality Assurance
Multi-function officer group helping to define key steps and approach to aid any future inquiries or investigations that may arise relating to alleged historical abuse	Kevin Kasaven, Assistant Director Safeguarding and Quality Assurance

Safeguarding and Quality Assurance Unit conducts audits, reviews of practice, identifies themes and patterns for accountable managers to respond and provides challenge.	Kevin Kasaven, Assistant Director Safeguarding and Quality Assurance
Multi Agency Public Protection arrangements (MAPPA) in place	Kevin Kasaven, Assistant Director Safeguarding and Quality Assurance
Kent & Medway Prevent Duty Delivery Board (chaired by KCC) oversees the activity of the Kent Channel Panel, co ordinating Prevent activity across the County and reporting to other relevant strategic bodies in the county (including reporting route to the Kent Safeguarding Children Multi Agency Partnership).	Richard Smith, Corporate Director ASCH
Manageable caseloads per social worker and robust caseload monitoring. Social work vacancies monitored with action taken to address as required.	Sarah Hammond, Director of Integrated Services (Children's Social Work Lead)
'Deep Dive' activity undertaken to investigate vacancy rates for staff that reflects factors such as maternity leave	Sarah Hammond, Director of Integrated Services (Children's Social Work Lead)
Integrated practice model	Sarah Hammond, Director of Integrated Services (Children's Social Work Lead) / Stuart Collins, Director Integrated Services (Early Help and Preventative Services lead)
Extensive staff training - Quality Assurance Framework has been rolled out and Integrated Children's Services team has received mandatory training related to this	Sarah Hammond, Director of Integrated Services (Children's Social Work Lead) / Stuart Collins, Director Integrated Services (Early Help and Preventative Services lead)
Kent Channel Panel (early intervention mechanism providing tailored support to people who have been identified as at risk of being radicalised) in place.	Nick Wilkinson, Prevent and Channel Strategic Manager
Joint Exploitation Group (Kent & Medway) children and adults focuses on PREVENT, gangs, Modern Slavery, human trafficking and online safeguarding matters. Reports to Kent and Medway Adults Safeguarding Board and KSCMP.	Nick Wilkinson, Prevent and Channel Strategic Manager
KCC cross directorate PREVENT group meets regularly and ensures the PREVENT duty is embedded across the organisation. Regular updates are provided to the Corporate Management Team. PREVENT	Nick Wilkinson, Prevent and Channel Strategic Manager

training strategy in place and regularly reviewed.		
The annual assurance statement is a self-declaration approved by the Head of Paid Service which captures the Authority's compliance with the requirements of the Counter Terrorism Act. Actions identified within the annual assurance statement are transferred to the Kent and Medway Action Plan. Kent and Medway Board for PREVENT have oversight of action progress.		Nick Wilkinson, Prevent and Channel Strategic Manager
Semi-regional PREVENT model of delivery across Kent & Medway developed		Nick Wilkinson, Prevent and Channel Strategic Manager
New adolescent risk management process agreed, and approach signed off.		Stuart Collins, Director Integrated Services (Early Help and Preventative Services lead)
Kent and Medway Gangs Strategy 2018-21 outlines the multi-agency approach to ending the criminal exploitation of vulnerable children and adults by gangs		Stuart Collins, Director Integrated Services (Early Help and Preventative Services lead)
Education Safeguarding Team in place as part of the contract with The Education People		Christine McInnes, Director of Education
Section 11" audit conducted periodically to provide assurance that relevant agencies and individuals are cooperating to safeguard children and promote their welfare, with feedback and follow up. .		Jennifer Maiden-Brooks, Systems Improvement Manager, Kent Safeguarding Children Multi-Agency Partnership
Action Title	Action Owner	Planned Completion Date
Recommendations from the recent Kent and Medway PREVENT Peer review to improve and promote best practice are being implemented.	Nick Wilkinson, Prevent and Channel Strategic Manager	April 2022

Examples of Committee reports of relevance to this risk since April 2021:

Kent Community Safety Partnership 18 th November 2021	Item D3 - Kent and Medway PREVENT Duty Delivery Board Update https://democracy.kent.gov.uk/documents/g8912/Public%20reports%20pack%2018th-Nov-2021%2010.00%20Kent%20Community%20Safety%20Partnership.pdf?T=10
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Kent Community Safety Partnership 18 th November 2021	Item B1 - Kent and Medway Domestic Abuse Strategy Update https://democracy.kent.gov.uk/documents/g8912/Public%20reports%20pack%2018th-Nov-2021%2010.00%20Kent%20Community%20Safety%20Partnership.pdf?T=10
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Risk ID	CRR0010	Risk Title	Suitable provision for Unaccompanied Asylum-Seeking Children (UASC)			
Source / Cause of risk	Risk Event	Consequence	Risk Owner	Current Likelihood	Current Impact	
Historically the numbers of UASC arrivals have placed additional pressure on children's services, along with significant numbers of age-disputed new arrivals.	Risk of judicial review against KCC, along with associated time and cost implications.	KCC in breach of its statutory duty. Judicial review.	Matt Dunkley, Corporate Director, CYPE	Possible (3)	Serious (4)	
KCC now have a quota of intakes agreed with the Home Office, and the National Transfer Scheme has now yet been mandated. Transfers have begun to pick up and other LAs are being required to take new arrivals directly from Kent and from the Port of arrival.				Target Residual Likelihood	Target Residual Impact	
			Responsible Cabinet Member	Unlikely (2)	Possible (3)	
			Sue Chandler, Integrated Children's Services			
Control Title				Control Owner		
Representations made to Government for additional support to deal with care leaver legacy costs				Roger Gough, Leader of the Council		
The Council has utilised / re-purposed buildings in order to increase accommodation capacity in the short term.				Rebecca Spore, Director Infrastructure		
National Transfer scheme has now been mandated, meaning more children have been transferred to other local authorities.				Sarah Hammond, Director of Integrated Services (Children's Social Work Lead)		
UASC analytical modelling complete and monitored to assess capacity and continually review KCC position				Matt Dunkley, Corporate Director CYPE / Rachel		

	Kennard, Chief Analyst
Letter Before Claim laid before the Home Secretary – formal reply awaited. This is currently in abeyance.	Benjamin Watts, General Counsel
The council is in advanced discussions with the Home Office to arrange a safe and sustainable solution for KCC to support those who arrive in the country. This has been achieved.	Roger Gough, Leader of the Council / Sue Chandler, Cabinet Member Integrated Children's Services

Risk ID	CRR0044	Risk Title	High Needs Funding shortfall			
<p>Source / Cause of risk</p> <p>The demand for Special Educational Needs and Disability (SEND) support is rising and at a much faster rate than the school age population, and the Council's Dedicated Schools Grant (DSG) budget is overspending on the High Needs Block and has already accrued a deficit of £62m on the DSG reserve.</p> <p>Corresponding pressure on some of KCC's non-DSG SEND related budgets e.g. SEN Home to School Transport, is also being experienced.</p> <p>Consequently, meeting the needs of children and young people with SEND within available resources is becoming ever more challenging.</p> <p>The ability to forecast costs in future years is difficult.</p> <p>The Department for Education (DfE) is introducing tighter reporting requirements on local authorities who have a deficit in their DSG account.</p>	<p>Risk Event</p> <p>Inability to manage within budget going forward.</p> <p>Inability to reduce accumulated deficit on Dedicated Schools Grant reserve.</p>	<p>Consequence</p> <p>Continued funding of deficit on the DSG reserve by net surplus balances in other reserves becomes unsustainable, impacting on the financial resilience of the Council.</p> <p>Impact on support for children with SEND (cross reference to CRR0047)</p>	<p>Risk Owner</p> <p>Matt Dunkley, Corporate Director CYPE</p> <p>Responsible Cabinet Member(s):</p> <p>Shellina Prendergast, Education & Skills</p>	<p>Current Likelihood</p> <p>Likely (4)</p>	<p>Current Impact</p> <p>Major (5)</p>	
				<p>Target Residual Likelihood</p> <p>Likely (4)</p>	<p>Target Residual Impact</p> <p>Serious (4)</p>	

Control Title	Control Owner	
Block payment arrangement negotiated with Further Education colleges. For this early confirmation and certainty in funding colleges are expected to absorb inflationary pressures and provide support to any growth in the number of post 16 young people with High Needs.	Karen Stone, Revenue Finance Manager (0 - 25 services) / Christine McInnes, Director of Education	
Continual lobbying of Government on two matters; increased funding in both the short and medium term, and structural changes to government policy to help reduce the demand i.e. via County Council Network, Association of Directors' of Children's Services. Includes provision of evidence of the impact of the High Needs pressures on the quality of education children receive, schools, other providers and the Local Authority.	Roger Gough, Leader of the Council / Shellina Prendergast, Cabinet Member, Education and Skills / Matt Dunkley Corporate Director (CYPE)	
KCC conducted a review of provision of pupils in mainstream schools with High Needs, introducing changes aiming to ensure the number of High Needs pupils in mainstream schools does not contribute to the current budget pressures.	Christine McInnes, Director of Education / Karen Stone, Revenue Finance Manager (0 - 25 services)	
As required by the DfE, a recovery plan is produced (if the LA is either in deficit or if there is a significant reduction in their surplus) outlining how KCC can bring in-year spending in line with in-year funding, and options for how the accumulated deficit could be repaid. To be presented to the Schools' Funding Forum and approved by the Council's Section 151 Officer	Zena Cooke, Corporate Director Finance (Section 151 Officer) / Christine McInnes, Director of Education	
Action Title	Action Owner	Planned Completion Date
High Needs Funding review to be undertaken and recommendations to be agreed with the School's Funding Forum. This links to Workstream B of the Written Statement of Action in supporting Inclusive Practices in schools.	Karen Stone, Revenue Finance Business Partner / Christine McInnes, Director of Education	March 2022
High Needs Funding review working group ongoing, overseen by Director for SEN and Director for Education	Mark Walker, Director SEN / Christine McInnes, Director of Education	March 2022
Implementation of SEND Written Statement of Action Inclusion workstream to better address the relationship between learner need, outcomes, provision and cost. Including: <ul style="list-style-type: none"> - Tighter commissioning arrangements to drive down the cost of placements in Independent Non-Maintained Special Schools 	Matt Dunkley, Corporate Director CYPE	March 2022

Building capacity and an inclusive ethos in mainstream schools to improve teaching and confidence in supporting more children with higher levels of need.

Matt Dunkley, Corporate Director CYPE

March 2022

Examples of Committee reports of relevance to this risk since April 2021:

<p>CYPE Cabinet Committee 11th January 2022</p>	<p>Item 12 – SEND Update Item 12 SEND Revisit Presentation 13.12.21.pdf (kent.gov.uk)</p>
<p>CYPE Cabinet Committee 11th January 2022</p>	<p>Item 10 – Special Educational Needs Strategy 2021-24 - Update THE REPORT (kent.gov.uk)</p>
<p>CYPE Cabinet Committee 14th September 2021</p>	<p>Item 8 - SEND Update https://democracy.kent.gov.uk/documents/g8871/Public%20reports%20pack%2014th-Sep-2021%2010.00%20Childrens%20Young%20People%20and%20Education%20Cabinet%20Committee.pdf?T=10</p>
<p>CYPE Cabinet Committee 30th June 2021</p>	<p>Item 10 - Non-Maintained and Independent Special School Commissioning Strategy https://democracy.kent.gov.uk/documents/g8525/Public%20reports%20pack%2030th-Jun-2021%2010.00%20Childrens%20Young%20People%20and%20Education%20Cabinet%20Committee.pdf?T=10</p>

Risk ID	CRR0047	Risk Title	Adequacy of support for children with Special Educational Needs and Disabilities (SEND) – implementation of Kent Local Area SEND Written Statement of Action			
Source / Cause of risk	Risk Event	Consequence	Risk Owner	Current Likelihood	Current Impact	
Ofsted and the Care Quality Commission (CQC) conducted a joint inspection of the local area of Kent in early 2019, to judge the effectiveness of the area in implementing the disability and special educational needs reforms set out in the Children and Families Act 2014.	Insufficient improvement in areas identified within timescales.	Adverse impact on outcomes for vulnerable young people Dissatisfaction from families Potential for legal action if statutory time limits or processes are not met.	Matt Dunkley, Corporate Director CYPE	Likely (4)	Major (5)	
While a number of strengths were identified, a number of weaknesses and areas of concern were raised.			Responsible Cabinet Member(s):	Target Residual Likelihood	Target Residual Impact	
In response to these concerns a programme has been identified across both KCC and Clinical Commissioning Groups to implement the changes and improvements required.			Sue Chandler, Integrated Children's Services	Unlikely (2)	Major (5)	
The programme is being delivered against a challenging backdrop of significant increases in demand and a shortfall in High Needs funding (see risk CRR0044), while some aspects of the programme are being revised to take account of implications of the Covid-19 pandemic.						

Control Title	Control Owner	
SEND Steering Group in place, with responsibility for coordinating activity and tracking progress across the five identified workstreams in the Written Statement of Action, reporting into the Improvement Board.	Mark Walker, Director for SEND	
Effective use of SEND Improvement Programme Risk register.	Mark Walker, Director for SEND	
Local area SEND Strategy developed in collaboration with partners, which goes beyond the Written Statement of Action to enable sustained improvement and transform Kent's SEND offer.	Matt Dunkley, Corporate Director CYPE (KCC lead)	
Kent Joint SEND vision established	Matt Dunkley, Corporate Director CYPE (KCC lead)	
SEND Improvement Board established, meeting monthly, to ensure collaborative working across education, health and social care, to have a strategic overview of services and drive the operational workstreams that have been developed to address each area of significant weakness.	Matt Dunkley, Corporate Director CYPE (KCC lead)	
Robust programme management in place, ensuring appropriate integration between workstreams and delivery plan.	Matt Dunkley, Corporate Director CYPE (KCC lead)	
0-25 Health and Wellbeing Board is the strategic board for children's services that oversees delivery of these services in Kent. A new joint governance with health has been established from November 2020.	Matt Dunkley, Corporate Director CYPE (KCC lead)	
Action Title	Action Owner	Planned Completion Date
SEND Improvement Programme, which includes delivery of requirements detailed in the Kent Written Statement of Action, covering five key workstreams relating to: -Parental engagement and co-production -Inclusive practice and the outcomes, progress and attainment of children and young people. - Quality of Education, Health and Care Plans	Mark Walker, Director for SEND	April 2022 (review)

