From: **Rory Love, Cabinet Member for Education and Skills**

               Sarah Hammond, Corporate Director of Children, Young People and Education

               Christine McInnes, Director of Education and SEN

To: **Children's, Young People and Education Cabinet Committee 16 May 2024**

Subject: **24/00026 – Adoption of the Locality Model for Special Educational Needs Inclusion**

Key decision:

- **It affects more than 2 Electoral Divisions AND**
- **It involves expenditure or savings of £1m or more**

Classification: **Unrestricted**

Past Pathway of report: **CYPE DMT 27 March 2024**

Future Pathway of report: Cabinet Member decision

Electoral Division: **All electoral divisions**

Summary: The aim of this report is to set out:
1. Context
2. How the Locality Model will support children and young people with SEN
3. Consultation analysis
4. KCC's response to consultation findings, including planned activity
5. Next steps

Recommendation(s):
CYPE Cabinet Committee is asked to consider and endorse, or make recommendations to the Cabinet Member for Education and Skills on the proposed decision to adopt the Locality Model for Special Educational Needs Inclusion in Kent

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Editor's Note: This report is one in a suite of four reports to CYPE Cabinet 16 May 2024 and should be read in conjunction with these documents.
- Kent SEND transformation projects
- The Locality Model for Special Educational Needs Inclusion (this report)
- Proposals for the Review of Special Schools
- Specialist Resource Provision Review

1.   Introduction

1.1   In May 2023, at Kent County Council's (KCC) Children Young People and Education (CYPE) Cabinet Committee, the **Countywide Approach to Inclusive Education (CATIE)**[1] was set out as KCC's strategy for 2023-28.

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[1] Link at 10.1

CATIE's Priority Two is to "Provide additional intervention and support with engagement and integration", which aims to develop community working and implement structures that support children and young people with Special Educational Needs and Disabilities (SEND) in Kent.

1.2 Due to local pressures, and responding to the developing national position, KCC has been working hard on improving the standards achieved and progress made of children and young people with SEND in Kent. As part of this work a **public consultation on the proposal of a Locality Model for Special Educational Needs (SEN) Inclusion in Kent**[2] was undertaken between 29 November 2023 and 24 January 2024. The consultation related to proposals on provision for children and young people of statutory school age (aged 5-16-year-olds) in mainstream primary and secondary schools, and for children attending sixth form in state funded schools, a Locality Model for inclusion.

1.3 The aim of this report is therefore to set out:
- The context
- How the Locality Model will support children and young people with SEN
- Consultation analysis
- KCC's response to consultation findings, including planned activity
- Next steps

2. Report detail
Context
2.1 As defined in the report '**Kent SEND transformation projects'** The Locality Model has been developed to respond to the CATIE Strategy, and other stressors within the current system. In delivering structures that will facilitate local schools and relevant professionals working together, the Locality Model will increase local knowledge, improve decision-making through greater collaborations, and improve the timely identification of resources required to support children and young people with SEN.

2.2 Research by the **Department for Education (DfE)**[3] shows that more consistent and effective support in mainstream schools leads to positive outcomes for children and young people and helps parents to have greater confidence in the mainstream offer for their child. The Locality Model requires KCC, schools, the NHS, and other SEN service providers to work together more effectively, in geographically based Clusters, to secure such improvements. The Locality Model aims to enable SEN support, and services, to be accessed more easily and delivered in a new, more sustainable way. KCC believes this will help pupils to thrive at school, be valued, visible, and supported to feel that they are included in their local communities, and are better prepared for a happy, healthy, and productive adulthood.

2.3 Kent schools currently operate individually; making decisions involving pupils with SEN without much opportunity to make these collaboratively, to moderate the thresholds used, or to make decisions across groups of schools. The current system for allocating High Needs Funding (HNF) encourages this approach and does nothing to support those schools that would prefer to take a

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[2] Link at 10.2
[3] Link at 10.3

more collaborative or strategic approach to supporting the needs of children with a similar profile of needs through, for example, commissioning support across a group of schools. This has led to the inconsistencies found in mainstream SEN inclusion and provision, as identified in the area inspection (2019) and re-visit (2022). Some pupils in Kent are potentially placed in specialist provision who would be educated successfully in mainstream settings in other local authorities, or in other mainstream schools within the county.

2.4   The Locality Model directly aligns with KCC's strategic vison for children, young people, and families, as set out in **'Framing Kent's Future'**[4] (Priority 1: Levelling up Kent). This explains that: 'We will maintain improvement support services for all Kent schools, including maintained schools and academies, to maintain Kent's high-quality education system'. The Locality Model will implement structures that are designed to increase the inclusion of children and young people with SEN in mainstream schools, so they can be educated with, and are able to access the same opportunities to education as their peers wherever possible. The aim is for children and young people with SEN in Kent to receive early and timely support. Greater numbers of children and young people are able to have their needs met within mainstream settings, or should they need specialist provision, that wherever possible, they can access this locally, close to where they live.

2.5   Under the Locality Model structure, available resources will be discussed by groups of schools and other SEN, education, and healthcare professionals in the local area, to determine where resource and High Needs Funding (HNF) allocations would be best directed. The final decision to allocate HNF will remain with KCC, but by discussions occurring locally, KCC aim to make better use of resources. This activity is expected to support KCC its Safety Valve aims to achieve financial sustainability in the longer term. This would align with priorities set out in **Securing Kent's Future**[5]**,** the next step on from Framing Kent's Future, agreed at Cabinet in October 2023.

2.6   The process for developing the Locality Model was iterative, and alternative options were considered within the development process; to ensure the direction is right for Kent. The professionals involved in developing and defining our options consisted of KCC staff from education, finance, and SEN, alongside leaders of education from KCC mainstream primary and secondary schools (selective and non-selective), single and multi-Academy Trusts, special schools, and free schools. The following meetings and forums were used as part of the development process: headteacher briefings and workshops, school funding forum, High Needs sub-group meetings, LIFT Executive meetings, CATIE Steering group meetings, Specialist Teaching and Learning Service workshops, Kent Parents and Carers Together (PACT) meetings.

2.7   Three main options were considered:
- to maintain the current system
- to implement a Tariff system[6]
- to implement a Locality Model

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[4] Link at 10.4
[5] Link at 10.5
[6] Tariff system: a set of rules and funding levels

2.8　Option one was discounted as an impracticable solution; it is not currently performing well in Kent, there is current inconsistency in mainstream SEN inclusion and provision, along with a lack of effective monitoring systems and accountability. Ofsted have stated, poor standards are achieved, and progress made, by too many pupils with SEN under the current system.

2.9　Option two could have been viable but was discounted due to its identified limitations. A tariff system for mainstream would provide clear and transparent arrangements with a prescriptive allocation of resources but tends to be used in conjunction with individual funding allocations for children with EHCPs, rather than for wider operations and funding of SEN Support Services. The elements of inflexibility it would bring were also considered too restrictive for SEN support services, and unsupportive of innovative use of resources for mainstream if used on its own.

2.10　Option three was viewed as the best path for KCC to explore and define and develop further with partners. Research finds that more consistent and effective support in mainstream schools leads to positive outcomes for children and young people. Local authorities who make substantial use of peer moderation and mainstream collaboration have found that doing so improves consistency and is a useful source of advice and support. The Locality Model is designed to improve the quality of the mainstream education offer in Kent, through early and accurate identification of need, high quality teaching of a knowledge-rich curriculum, and timely access to specialist health and care support, as well as alternative provision placements where they are needed.

2.11　Proposals for the Locality Model were agreed following intensive collaboration with schools, settings, and other key stakeholders, and then put out to consultation with parent/carers, young people, all professional stakeholders, and all members of the public.

2.12　Following consultation, subsequent analysis of feedback, and defining KCC's response to consultation feedback (section 2.25 to 2.28), the Locality Model is now presented to Cabinet as the means through which KCC will implement improved SEN inclusion in mainstream education.

How the Locality Model will support inclusion
2.13　The Locality Model creates structures for SEN support and services to be accessed and delivered in a new way, making better use of local education, health and SEN expertise. The Locality Model requires KCC, schools, the NHS, and other SEN service providers to work together more effectively, in geographically based Clusters, to secure improvements. KCC believes this will help all pupils to thrive at school, be valued, visible, and supported to feel that they are included in their local communities, and are better prepared for a happy, healthy, and productive adulthood.

2.14　Research by the DfE has found local authorities that make substantial use of peer moderation and mainstream collaboration show improved consistency in decision-making and find it a useful source of advice and support. KCC's current process, with its dependence on individual decisions regarding resources, means there are few opportunities for peer support and challenge, and therefore missed opportunities for wider improvement in mainstream

support provision. The Locality Model sets in place the structures (Clusters, meetings, guidance and support) that allow for peer moderation to happen on a consistent basis.

2.15 Adopting concepts of 'predictable' and 'exceptional' needs, which would sit in a continuum of support in Kent, will provide a framework for consistent decisions to be made, making these decisions for children and young people more reliable and transparent. The consultation response clearly showed the importance of an agreed language within the continuum and communicating consistently in a clear and understandable way to all relevant parties, this is addressed in KCC's response to the consultation feedback. The introduction of a Kent SEN continuum, linking with the Special School Review and working collaboratively across these two projects will create a solid foundation for SEN support in Kent. 'Predictable' and 'Exceptional' needs are being defined, with agreed terminology, in collaboration with mainstream, special schools and specialist resource provisions via a series of engagement events. Questionnaires were sent to all mainstream and Specialist Resource Provisions (SRP) and the data collected in the special schools' review have all been collectively analysed to create a continuum for SEN that reflects Kent needs.

2.16 By having a virtual 'Team around the Cluster' the Locality Model will provide the professional support and resources needed, to ensure a greater proportion of children and young people with SEN can access a high-quality, inclusive education, within a mainstream setting in their geographical area (where this is appropriate to their needs).

2.17 Headteachers, with the support of other members of the Cluster, would be responsible for collaboratively driving local SEN mainstream improvement. They would do this through implementing a school-to-school improvement process, and by influencing the way in which their Cluster's available collective resource and other resources for 'predictable' needs would be used.

2.18 The Locality Model will support KCC to use the HNF more effectively, in close collaboration with local schools and other SEN professionals. To do this KCC will make an amount of shared resource available to each Cluster (from the HNF Block), to meet 'predictable' needs of SEN support services. Financial modelling would be used to stabilise current spending. This shared resource, rather than much smaller amounts of money attached to individuals, will allow schools to explore many options, which can be used more creatively and would bring the advantage of economies of scale to purchasing support provision. KCC would remain responsible and accountable for administration of these shared resources. A Tariff system will be developed for 'exceptional' needs, informed by the continuum for SEN, ensuring money from the HNF Block can be allocated responsively and sustainably via evidence-based decision-making.

2.19 By implementing the Locality Model, with peer moderation at its core, there will naturally be greater transparency about the levels of funding involved, and the levels of investment schools should be making themselves (through their delegated/notional budgets), to develop expertise and capacity to support children and young people with SEN in mainstream schools. The Locality Model will help to strengthen these expectations and ensure that the mainstream offer

is more consistent in Kent. A stronger emphasis and greater transparency on schools' use of their notional SEN budgets will support schools to recognise needs that should be met from their delegated budget.

2.20 Clusters will include both primary and secondary schools to ensure they have a clear role in supporting transition arrangements for pupils. This will be achieved through a greater focus on SEN cross-phase collaborative planning within and between Clusters. Schools will have greater knowledge of levels of need and interventions that have been effective at earlier education stages, with the aim of ensuring all children who can be educated in a mainstream setting are enabled and supported to do so.

Consultation analysis
2.21 A summary of engagement with the consultation webpage and material during the consultation period can be seen below:
- 13,993 visits to the consultation webpage by 11,963 visitors
- Organic posts had a total of 644 clicks through to the consultation webpage and had a reach/impression of 66,202
- Paid Facebook posts had a reach of 58,299, 1,997 clicks on the link to the consultation webpage, 200,051 impressions and 132 shares

2.22 The public consultation received 832 responses, considered a good response rate for a consultation of this kind, and showing how important the subject is for parents, education professionals and others in Kent. Analysis of respondents showed the following broad split:

Parents [of children still in education]	440 (52%)
Education professionals	340 (40%)
Neither	66 (8%)

2.23 The consultation questionnaire invited respondents' views on the proposals. It contained both closed questions (based on a five-point Likert scale) and open questions. The full evaluation can be found in the **Consultation Analysis Report**[7]. Respondents were asked whether they agreed or disagreed that the proposed Locality Model would drive improvements to mainstream education and inclusion in the county, 59% believed they would not. The 2 highest quoted reasons for this were that mainstream education is not suitable for all students with SEN and that not enough information was given in the consultation documents for people to form an informed view on the proposals.

2.24 The feedback from the consultation highlighted the key areas we need to focus on to ensure we design a system that works for children and young people with SEN and their families. KCC's response to the consultation feedback has been documented and is included with the Consultation Analysis Report, setting out how KCC will address issues raised. The Locality Model is presented to Cabinet with the Special Schools Review and the Specialist Resource Provision as part of a joined-up approach to embed system-wide change.

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[7] Link at 10.6

2.25 There are four main approaches to be taken to the majority of issues raised, these are:

1. Where concerns or comments have been based on misconceptions or misunderstanding, these can be directly addressed and responded to, or where there are already plans in place to address these concerns.

2. Where we have taken on board feedback and need to accelerate planned work to provide further information to consultees.

3. Where we have taken on board the comments relating to utilisation of existing local structures and concerns around the shape and capacity of teams that would work around proposed Clusters. We also intend to use the introduction of the "This is Me" project that has been running successfully across five primary schools in Tunbridge Wells, into Maidstone, working with schools and the NHS, utilising a Cluster-based approach. KCC is also partnering with NASEN to develop the cluster operational model with a key focus on maintaining strong current practice. The learning from both these approaches will inform the detailed operating model.

4. We will consult with schools on the detailed operating model and supporting guidance.

2.26 The highest quoted concern of the consultation was that 'mainstream education, based on inclusion, is not suitable for all students with SEN (with concerns raised about any increase in its use)'. KCC response:

This is recognised by KCC. The development of thresholds will provide guidance on the levels of support and type of provision a child is most likely to require. Without transparent thresholds, there is likely to be inequity in provision and decision-making. The majority of local authorities have clear published thresholds. We have accelerated the work on the definitions and thresholds in order to provide more detail to schools, education professionals and parents and expect to have these ready in order to consult further over the summer period.

2.27 There was a strong feeling, and the second highest element of feedback received, that 'not enough information has been given for [me] to be able to form a view on the proposals (more thinking is required). KCC response:

This consultation was intended to be about the principle of a Locality Model only. The next stage is to work in partnership to design and test the detail. This will be through:
The delivery of the "This is Me" project, working with schools and health partners across Maidstone, using the suggested Cluster groupings to also explore utilising structures already in place at a local level (also raised in the consultation responses). KCC is also partnering with NASEN to develop the cluster operational model with a key focus on maintaining strong current practice. The focus will be on addressing parental anxiety around their child's SEN and will be supported on the ground by Primary Care Navigators. The intention is to commence this project by early summer 2024. This project will enable the testing of what could be the terms of reference for Clusters, and

the infrastructure required to enable Cluster working (including Team Around the Cluster).

Over summer 2024, we also intend to run Area-based workshops with schools and key partners to develop the continuum of provision which will form the basis of the Cluster Model.

2.28 Another concern raised by the consultation was the use of the terms 'predictable' and 'exceptional' and a lack of a full definition in the consultation documentation. We acknowledge that these actual terms may not be helpful and need re-thinking, but it is crucial that we develop transparent and accessible thresholds across the range of SEN needs to inform decisions around the most appropriate support. Also, so that education providers, those who work with them, and families, are all clear on expectations and the support a child should be receiving related to their needs and ensuring that those children with the most complex needs are able to secure a place in a Kent special school.

2.29 KCC are continuing to define these concepts, including agreeing the language used, as they form an essential part of the Locality Model and a Kent SEN continuum. The below graphic sketches out how we envisage the thresholds fitting in with the Locality Model, as well as the Special School and SRP initiatives.

2.30 KCC's full response to the feedback provided from the consultation can be found in Appendix Two.

Next Steps

2.31 Following full analysis of the consultation feedback and KCC's response, we are confident in the changes made to the proposals that were consulted on, and would like to implement the Locality Model, alongside a Kent SEN continuum, associated Tariff system and financial arrangements. The next steps for KCC are:

- Agree the Kent SEN continuum (to include all types of settings i.e. mainstream, specialist resource provision, alternative provision and special)
- Set up Clusters (operational guidance to include purpose, governance, roles, and responsibilities with a focus on outcomes)
- Complete financial modelling for allocation of cluster budgets across the county
- Agree a tariff system that supports the Kent SEN continuum and financial sustainability
- Identify and align all support services
- Consult with schools on Clusters operational guidance
- Establish and agree moderation procedures
- Establish and agree information flow/sharing
- Create and implement a communications plan (including communications with parents/carers)
- Implement system-wide change for SEN in Kent, aligning with the Special School Review and the Specialist Resource Provision projects.

3. Financial Implications

3.1 Kent currently spends approximately £45m per annum on specific high needs allocations to mainstream schools to support individual children with SEN (this excludes funding for children attending Specialist Resources Provisions in mainstream schools which totals over £20m per annum). Approximately 40% of the high needs funding allocations are for SEN support services for individual children and the remainder is for children with an EHCP. In addition, the council commissioned a further £8m of SEN support services in 2023-24. This is funded from the High Needs Block of the Dedicated Schools Grant (DSG), a specific ring-fenced education grant from the Department of Education.

3.2 The next stages of the project will define the cluster budgets and the amount of funding to be retained to fund the Tarriff model for children with "exceptional" needs. This tariff funding model is expected to be aligned across the continuum of provision to ensure continuity and correlation of funding and resources available to children educated in either a mainstream or special school.

3.3 Kent's Safety Valve agreement with the DfE[8] states:
> "The authority agrees to implement the DSG management plan that it has set out. This includes action to:
> **3.1.** Implement a countywide approach to 'Inclusion Education', to further build capacity in mainstream schools to support children and young people with Special Educational Needs and Disabilities (SEND), thus increasing the proportion of children successfully supported in mainstream education and reducing dependence on specialist provision
> **3.7.** Ensure there is sufficient and consistent capacity across the county to support children with severe and complex needs in their local area where possible
> **3.8.** Develop a school/area-led approach to commissioning of SEN support services (Locality Based Resources), to better respond to the needs of children and young people with SEND"
> *(page 2 and 3 DfE Dedicated Schools Grant 'Safety Valve' Agreement: Kent)*

3.4 Kent must implement a sustainable approach to HNF to meet the DfE Safety Valve agreement and to ensure financial sustainability in this area moving forwards; the Locality Model will build the robust governance and monitoring processes required to implement the necessary new approach.

4. Legal implications

4.1 Legal advice on the consultation was sought from Legal Services and the comments and suggestions from Bevan Brittan were incorporated into the final consultation documents.

4.2 Local Authorities must follow government guidance on the **Children and Families Act (2014)**[9], the distribution of their **High Needs Funding Block**[10] and work under the **SEND Code of Practice 2015**[11], these guidance documents were used in the development of the Locality Model proposed.

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[8] Link at 10.7
[9] Link at 10.8
[10] Link at 10.9
[11] Link at 10.10

5. Equalities implications

5.1 An Equalities Impact Assessment (EqIA) that has been updated in February 2024 can be found in Appendix Three

6. Risk and Other Factors

6.1 It was a risk that the various initiatives progressing within SEN could have a detrimental impact leading to unnecessary confusion in the system. However, urgency for improvement dictated the need for all initiatives to progress. Work was ongoing to ensure these interdependencies were individually recognised and supported, but now by aligning and presenting the Locality Model, the Special School Review and Specialist Resource Provision projects we can more clearly illustrate the system-wide view of our SEN proposals. By co-ordinating the work that is underway to develop local clusters, thresholds (that will inform expectations of the different types of educational settings in Kent in a continuum of service delivery for the education system, and the types of settings, with a focus on improved outcomes for children and young people with SEN), and special school recommendations, we can cohesively improve education inclusion in Kent.

6.2 The Locality Model structure is designed to add greater transparency to the High Needs Block and allow more creative use of current resources, its implementation supports KCC's Safety Valve Agreement with the DfE.

6.3 The focus on outcomes for children and young people and the expectation that all schools engage with this model will support our improvement through the APP reporting. In order for the structure to be embedded it is proposed that there is a transition period between April 2024 and September 2025.

6.4 Risks will be continually monitored and mitigated throughout the implementation phase and the development of a robust operating model, detailed guidance, templates for decision making and monitoring will all contribute to minimising risk.

7. Governance

7.1 Christine McInnes - Director of Education and Special Educational Needs will inherit the main delegations via the Officer Scheme of Delegation.

8. Conclusions

8.1 To address the number of existing needs identified in Kent at this time, we believe the adoption of a Locality Model for mainstream inclusion, alongside implementing a Kent SEN continuum, and the progression of the Special School Review and SRP initiatives, will improve outcomes for children and young people with SEN.

8.2 With actions taken forward from the KCC response to the Locality Model public consultation, we believe the necessary steps will be taken to alleviate public and professional concerns on the model as it was initially presented.

8.3 The next report in this series of four is the Proposals for the Review of Special Schools.

9. Recommendation(s):

9.1 **Cabinet Committee -** The CYPE Cabinet Committee is asked to consider and endorse or make recommendations to the Cabinet Member Education and Skills on the proposed decision to adopt a Locality Model for Special Educational Needs Inclusion in Kent.

10.   Background Documents

10.1   CATIE Strategy 2023-28 - https://www.kelsi.org.uk/special-education-needs/inclusion/countywide-approach-to-inclusive-education

10.2   Public consultation on Locality Model information - www.kent.gov.uk/localitymodel

10.3   High needs budgets: effective management in local authorities. Research report - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1084458/DFE_HN_Budget_case_study_report.pdf

10.4   Framing Kent' Future - https://www.kent.gov.uk/about-the-council/strategies-and-policies/framing-kents-future

10.5   Securing Kent's Future - https://democracy.kent.gov.uk/documents/s121235/Securing%20Kents%20Future%20-%20Budget%20Recovery%20Strategy.pdf

10.6   Public Consultation Analysis Report - www.kent.gov.uk/localitymodel

10.7   DfE and Kent Safety Valve Agreement - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1143013/Kent_Safety_Valve_Agreement_2022_2023.pdf

10.8   Children and Families Act (2014) - https://www.legislation.gov.uk/ukpga/2014/6

10.9   HNF 2023 to 2024 Operational Guidance - https://www.gov.uk/government/publications/high-needs-funding-arrangements-2023-to-2024/high-needs-funding-2023-to-2024-operational-guide

10.10 SEND Code of Practice - https://www.gov.uk/government/publications/send-code-of-practice-0-to-25

11. Contact details

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12. Appendices

Appendix One - The Locality Model Consultation Analysis Report can be found here: https://letstalk.kent.gov.uk/locality-model-for-special-educational-needs-inclusion

Appendix Two -   KCC's response to Locality Model Consultation

Appendix Two -   KCC's response to Locality Model Consultation

Responses to consultation on proposals to establish a new Locality Model for the provision of Special Educational Needs in Kent.

The consultation period ran from 29th November 2023 to 24th January 2024. 832 responses were received. The most frequently mentioned issues are detailed in the table below with commentary of how KCC intends to take the comments on board and respond to any concerns. There are four main approaches to be taken to the majority of issues raised:

1. Where concerns or comments have been based on misconceptions or misunderstanding, these can be directly addressed and responded to, or where there are already plans in place to address these concerns.
2. Where we have taken on board feedback and need to accelerate planned work to provide further information to consultees.
3. Where we have taken on board the comments relating to utilisation of existing local structures and concerns around the shape and capacity of teams that would work around proposed Clusters. We also intend to use the introduction of the "This is Me" project that has been running successfully across five primary schools in Tunbridge Wells, into Maidstone, working with schools and the NHS, utilising a Cluster-based approach. KCC is also partnering with NASEN to develop the cluster operational model with a key focus on maintaining strong current practice. The learning from both these approaches will inform the detailed operating model.
4. We will consult with schools on the detailed operating model and supporting guidance.

Category of comment/concern	No. of mentions	Response	Action Area 1 to 4
Mainstream education, based on inclusion, is not suitable for all students with SEN (with further concerns raised about any increase in its use).	261	This is recognised. The development of the thresholds will provide guidance on the levels of support and type of provision a child is most likely to require. Without transparent thresholds, there is likely to be inequity in provision and decision- making. The majority of local authorities have clear published thresholds. We have accelerated the work on the definitions and thresholds in order to provide more detail to schools, education professionals and parents and expect to have these ready in order to consult further over the summer period.	2
Not enough information has been given for me to be able to form a view on the proposals. (More thinking is required.)	115	Agree. This consultation was intended to be about the principle of a Locality Model only. The next stage is to work in partnership to design and test the detail. This will be through:	3

		• The delivery of the "This is Me" project, working with schools and health partners across Maidstone, using the suggested Cluster groupings to also explore utilising structures already in place at a local level (also raised in the consultation responses). KCC is also partnering with NASEN to develop the cluster operational model with a key focus on maintaining strong current practice. The focus will be on addressing parental anxiety around their child's SEN and will be supported on the ground by Primary Care Navigators. The intention is to commence this project by early summer 2024. This project will enable the testing of what could be the terms of reference for clusters, and the infrastructure required to enable Cluster working (including Team Around the Cluster). • Over summer 2024, we also intend to run Area based workshops with schools and key partners to develop the continuum of provision which will form the basis of the Cluster Model.	
Various 'Cluster management-related' concerns – time to run; impact on workloads; additional bureaucracy; complexity of meetings; impact on key staff (head teachers and Special Educational Needs Co-ordinator [SENCOs]) etc.	112	See response in relation to issue above.	**3**
Concerns about the definitions of 'predictable' and 'exceptional', including their impact on young people.	100	We acknowledge that these actual terms are not helpful and need re-thinking, but it is crucial that we develop transparent and accessible thresholds across the range of SEND needs to inform decisions around the most appropriate support and also, so that education providers, those who work with them and families are all clear on expectations and the support a child should be receiving related to their needs and ensuring that those children with the most complex needs are able to secure a place in a Kent special school.	**2**
There should be more local specialist	98	The current Kent Sufficiency Plan	**1**

school places – either in special schools or in special resource centres.		identified the need for more special schools and bids were made to the DfE as part of the Safety Valve process. We were awarded two special schools, one for Dartford/Swanley (240 places) and one for the coastal Herne Bay/Whitstable (120 places) areas. A new 120 place Special School and a 60 place special school satellite will also be opening on the Isle of Sheppey. The Plan also identified a lack of pathways from primary SRPs to secondary mainstream with SRP provision in 7 of Kent's 12 districts. District workshops will be taking place during late spring and early summer to identify options for delivery. We also have underutilisation of some SRPs and are therefore looking at where designations may need to be changed or expanded to meet areas of need that are more in demand, so that we make best use of the provision that we already have.	
This is really about reducing the cost of SEN provision/saving money from the HNF budget.	87	This is about making **best use** of the High Needs funding we receive and targeting it so that it has the most impact on improving outcomes for children and young people with SEND. It is intended to enable localities to respond more appropriately and flexibly to SEND needs within and across their group of schools.	**1**
Considerable training will be needed for all school staff (and others) if this is to work.	82	Agreed. Considerable training is already being delivered for staff in schools, but a detailed implementation plan to include training specific to operating a cluster model and the implications of that will be developed.	**3&4**
The funding models (KCC to Clusters, and Clusters to schools) need to be transparent, consistent, and to be fully developed and explained.	80	Agree. Work on the funding model across the continuum of need is underway and the allocations and systems and processes for the utilisation of funding at a cluster level will be developed and training and support provided. The intention is that all should be transparent, from SEN thresholds and expectations of levels of support, to decisions taken and utilisation of funding and the impact it is having.	**3&4**
Other concerns			
Do not move children currently in		It is not the intention of the Locality Model to move children who are	**1**

specialist provision into mainstream		currently in special schools into mainstream.	
The lack of sufficient professional support services to deliver a reasonable Team Around The Cluster (TATC) service – respondents pointed out that many therapies etc. were already in short supply in particular localities and/or countywide, and could not see how the proposed Model would improve matters		This is to be tested in the Area workshops and through the *This is Me* project in Maidstone. It may be that current resources have to be targeted in a different way than currently, but we will only identify this through more detailed work with schools, other professionals working with schools and families and health services, NHS colleagues and services. Utilising funding at a cluster level in a different way over time could enable clusters to purchase in additional resource targeted to the profile of needs of the children in that cluster who require specific support.	**3**
How existing services operating in the TATC space would fit into the new structure and processes.		This will be tested over the summer as we work with Inclusion Champions and Kent Association of Leaders in Education (KALE) so that schools can access existing services quickly and easily thus avoiding unnecessary bureaucracy. It will also be explored in practice through the delivery of the *This is Me* project in partnership with the NHS to be run in Maidstone based on the suggested cluster groupings of schools.	**3**
Whether the other (mainly health-related) services could, and if they could (in theory) would (in practice), engage in the ways that the Model required of them.		This is to be tested over the summer and autumn. A Section F review of therapies is being undertaken currently that will report in 2025. Meanwhile a qualified provider list is being produced to help inform schools and potential clusters that may be prepared to purchase in specific support utilising High Needs funding.	**3**
More fundamentally whether an education-related SEN system should be based on a health-related PCN structure, and the associated practical difficulties (from an education perspective) – in particular the impact on multi academy trusts [MATs] and disruption to any existing networks – that would arise if it were		A number of concerns regarding where the borders would be that split the Clusters were raised during the consultation . The clusters should not preclude any school or group of schools from continuing with relationships with other schools that have been established over many years for good reasons. It may be that in some instances clusters may wish to work together on a specific issue. This would be for them to decide. MATS will be fully involved in the testing of the model to ensure that schools in a MAT that are in different clusters will not face challenges in engaging fully and	**3&4**

		accessing support when required. The second phase of consultation on the operating model will include specific discussions with MAT CEOs and their SEND leads.	
The proposed size of the Clusters – for many respondents they would be too large at 8 to 14 schools making them, for various reasons, too difficult to operate and manage.		This will be kept under review, but smaller clusters will be more challenging to support and resource.	**3&4**
Concerns around how unpredicted "in-year" events might be funded when allocations have already been made to clusters		The Area workshops will also look at the relationship between LA level and Area level resource and support and cluster level resources. It is acknowledged that there may be particular needs or situations that would require consideration for support at an Area level and large-scale unpredictable events that may require an alternative response at an LA level.	**2**
There is no dispute resolution		We will encompass this in the operating guidance that will be consulted on with schools and MATs.	**3&4**
Concerns around bureaucracy and pressure on schools /SENDCOs in running of the cluster-based model.		It is acknowledged that support will be required to run the clusters. This will be tested out over the summer.	**3&4**