

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

		<ul style="list-style-type: none"> 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 school places – either in special schools or in special resource centres.	98	The current Kent Sufficiency Plan 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	1

		<p>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.</p> <p>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.</p>	
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 specialist provision into mainstream		It is not the intention of the Locality Model to move children who are currently in special schools into mainstream.	1
The lack of sufficient professional support services to deliver a reasonable Team Around The Cluster (TATC) service – respondents pointed out that many therapies		This is to be tested in the Area workshops and through the <i>This is Me</i> 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	3

<p>etc. were already in short supply in particular localities and/or countywide, and could not see how the proposed Model would improve matters</p>		<p>through more detailed work with schools, other professionals working with schools and families and health services, NHS colleagues and services.</p> <p>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.</p>	
<p>How existing services operating in the TATC space would fit into the new structure and processes.</p>		<p>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.</p> <p>It will also be explored in practice through the delivery of the <i>This is Me</i> project in partnership with the NHS to be run in Maidstone based on the suggested cluster groupings of schools.</p>	<p>3</p>
<p>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.</p>		<p>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.</p>	<p>3</p>
<p>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</p>		<p>A number of concerns regarding where the borders would be that split the Clusters were raised during the consultation .</p> <p>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.</p> <p>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 accessing support when required. The second phase of consultation on the operating model will include specific discussions with MAT CEOs and their SEND leads.</p>	<p>3&4</p>
<p>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.</p>		<p>This will be kept under review, but smaller clusters will be more challenging to support and resource.</p>	<p>3&4</p>

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