From: Roger Gough, Cabinet Member for Children, Young People and

Education

Matt Dunkley, CBE, Corporate Director of Children, Young

People and Education

To: Children's, Young People and Education Cabinet Committee –

28 March 2019

Subject: Risk Management: Children, Young People and Education

Classification: Unrestricted

Past Pathway of Paper: None

Future Pathway of Paper: None

Electoral Division: All

#### Summary:

This paper presents the strategic risks relating to the Children's, Young People and Education Cabinet Committee, comprising of four risks featuring on the Corporate Risk Register for which the Corporate Director is the designated "Risk Owner" on behalf of the Corporate Management Team; plus, a summary of key risks within the directorate.

#### Recommendation(s):

The Children's, Young People and Education Cabinet Committee is asked to **CONSIDER** and **COMMENT** on the risks presented.

#### 1. Introduction

- 1.1 Risk management is a key element of the Council's internal control framework and the requirement to maintain risk registers ensures that potential risks that may prevent the Authority from achieving its objectives are identified and controlled.
- 1.2 Directorate risks are reported to this Cabinet Committee annually and comprise of strategic or cross-cutting risks that potentially affect several functions across the Children, Young People and Education directorate, and often have wider potential interdependencies with other services across the Council and external parties.
- 1.3 Corporate Directors also lead or coordinate mitigating actions in conjunction with other Directors across the organisation to manage risks featuring on the Corporate Risk Register.

1.4 Most of these risks, or at least aspects of them, will have been discussed in depth at the relevant Cabinet Committee(s) throughout the year, demonstrating that risk considerations are embedded within core business.

### 2. CYPE led Corporate Risks

2.1 The Corporate Director for the Children, Young People and Education directorate is the lead Director for four of the council's corporate risks. A brief summary of changes over the past year are outlined below, with full details contained in the risk register attached at appendix 1.

Risk reference	Risk description	Current score	Target score
CRR0001	Safeguarding – protecting vulnerable children	15 (Medium)	15 (Medium)

The risk level was reduced to its 'target' residual score at the end of 2017, due to a positive Ofsted inspection and management confidence in the controls in place. The actions set out in the Ofsted Practice Development Plan have been implemented.

A control added in autumn 2018 related to KCC's contribution to the Kent and Medway Gangs Strategy 2018 – 21, which outlines the multi-agency approach to ending the criminal exploitation of vulnerable children and adults by gangs.

Preparations are being made for new multi-agency safeguarding arrangements in response to Children & Social Work Act requirements, which are required to be in place by September 2019.

CRR0007	Resourcing implications arising from Children's	20 (High)	12
	Services demand		(Medium)

The risk has been more specifically defined to relate to demand challenges, with further integration of services for children (the Change for Kent Children programme) seen as part mitigation for the risk.

New multi-disciplinary teams were launched on 1st October 2018, along with a new Request for Support form to ensure that referrals are directed to the most appropriate level of support as quickly as possible; this could result in the referral being progressed to Early Help Intensive Units or Children's Social Work teams or signposted to lower levels of support within the community. The new form has been rolled out and training provided for multi-agency partners to ensure they fully understand its use. In addition, follow-up bespoke sessions have been arranged for GPs, Police and through Headteacher Briefings. A fully integrated staffing structure is now in place.

A short OFSTED inspection of KCC's arrangements to deal with 'Front Door' referrals took place late January/early Feb 2019. Findings will be reported to the CYPE Cabinet Committee.

CRR0016	Delivery of new school places is constrained by	16 (High)	12
	capital budget pressures and dependency upon		(Medium)
	the Education Skills Funding Agency (ESFA).		

The current rating reduced slightly during the 2018 autumn refresh of the corporate risk register due to amendments to the Kent Commissioning Plan being made in response to issues arising and contingency arrangements are made as required in specific parts of the county, although it is still high. Capital forward funding from the ESFA for Basic Need has enabled a reduction in revenue prudential borrowing costs.

CRR0044	High Needs Funding and adequacy of support for children with Special Educational Needs and	20 (High)	12 (Medium)
	Disabilities (SEND)		(modiani)

The number of Children and Young People with Special Educational Needs and Disability (SEND) is rising faster than the underlying growth in population, which is a national issue. Kent is now maintaining over 11,900 Education Health and Care Plans (EHCP) which represents a growth of 58% since 2014/15.

Kent County Council's Pupil Premium Select Committee has considered SEND and High Needs Funding and extensive evidence had been submitted to the Secretary of State for Education which set out Kent's views and concerns.

A total transfer of 1% had been made from the Schools Block to the High Needs Block through the Funding Forum to address the growing demand for High Needs Funding that supported the needs of children with profound and complex Special Educational Needs and Disability (SEND). In December 2018 the Education Secretary announced an additional £250 million of funding to support children with SEND, across the two financial years 2018 to 2019, and 2019 to 2020. Further discussions are taking place in 2019 between government and the Schools Funding Forum to reexamine the transfers that had been made from the School's Block to the High Needs Block.

A SEND action plan is being implemented to address a number of practice-related issues arising from the increased demand, which will be reviewed to ensure any issues highlighted from the recent Ofsted inspection of SEND services are captured and acted upon.

Due to its significance this risk was escalated to the Corporate Risk Register during the 2018 autumn refresh.

#### 3. Children, Young People and Education risk profile

3.1 The current risks in the CYPE directorate risk register are shown below.

Risk reference	Risk description	Current score	Target score
CY0035	Implementation of new management information system.	16 (High)	12 (Medium)

The risk was recently escalated to the directorate risk register as the current system being used is becoming obsolete and a new system needs to be implemented urgently to ensure the continued flow of critical management information for the

business. Support for the current system has been extended, while regular meetings are being held with ICT colleagues to resolve concerns and ensure service user requirements are taken into account when the new system is introduced.

CY0008	Children who are home educated may not be	12	12
	safeguarded	(Medium)	(Medium)

The risk is currently judged to be at its 'target' residual level, with a home education policy in place that includes interaction with a child where there are welfare concerns and where other agencies have been involved with the family. However, the risk is being retained on the register until the findings of the Timpson review into school exclusions is published (scheduled for May) to see if this requires any additional action from the Local Authority.

CY0034	Business continuity and resilience	12	8
	•	(Medium)	(Medium)

The CYPE Directorate must ensure its services have robust contingency plans to reduce the impact and likelihood of high impact incidents and emergencies that take place in the County. While this is core business, a risk was added to the register in autumn 2018 to provide additional focus, particularly with the potential for disruption to KCC services identified in relation to a potential 'no-deal' Brexit at the end of March 2019. This is in addition to more generic business continuity risks associated with severe weather, for example.

A directorate resilience group is in place and has coordinated comprehensive reviewing and refreshing of service continuity plans, with representation from corporate functions to consider interdependencies.

CY0030	Management of the CYPE Directorate in year	12	4 (Low)
	budget	(Medium)	

This risk is impacted by a number of significant budgetary issues such as funding for school places by the Education Schools Funding Agency, the SEN budget and pressure on the dedicated schools grant. This is in addition to the ongoing concerns around asylum costs.

CY0007	More schools will move into a potentially deficit	12	8
	budget position.	(Medium)	(Medium)

Continued "flat cash" settlement for schools, coupled with national changes to schools funding puts significant pressure on the budgets of schools.

CY0032	Information Governance. Management of	9	6 (Low)
	personal data	(Medium)	

The risk related initially to the introduction and implementation of the General Data Protection Regulations (GDPR), which included several mitigations such as awareness raising, alongside specific tasks e.g. revision of privacy notices. The risk has now evolved into a more generic risk relating to the safeguarding and storage of personal data.

CY0009	Children not in full time education may not be receiving a suitable education	9 (Medium)	6 (Low)

This risk relates to the duty for the local authority to make arrangements to enable it to establish (so far as it is possible to do so) the identities of children in the area who are not receiving a suitable education and monitor those identified, the risk being that the relevant professionals involved are not aware of such children.

This is being mitigated by information sharing systems between School Admissions, Children Missing Education and Elective Home Education Teams. The Attendance service has been re-organised and the service re-focused on providing effective advice and monitoring of school attendance registers to identify any poor or illegal practice. Schools are challenged for any known poor or illegal practice in attendance registration. Centralised provision now results in an education programme for pupils not on a school roll where appropriate.

- 3.2 A risk regarding funding to support the number of former Unaccompanied Asylum-Seeking Children (UASC) under Leaving Care Regulations, was withdrawn from this register as the continuing funding shortfall is highlighted in the Corporate Risk Register as part of the budgetary risk.
- 3.3 An additional directorate risk is to be added relating to quality of practice for Special Educational Needs and Disabilities services, which will take into account findings from the recent Ofsted inspection.

#### 4. Divisional Risks

- 4.1 The Corporate and Directorate risks are underpinned by risks at a divisional level that are typically of a less strategic nature. The Directorate Management Team has regular oversight of significant divisional risks, which currently include those relating to:
  - Capacity of services to meet demand e.g. Educational Psychology
  - Underperformance of children's mental health services in the county.
  - Refreshing of ICT systems and their utilisation.
  - Costs associated with Children in care and care leaver placements.
  - Integration of the new Integrated Children's Services division
  - Social worker recruitment and retention
  - Pupil Referral Unit performance.

#### 5. Recommendation

#### Recommendation:

The Children's, Young People and Education Cabinet Committee is asked to **CONSIDER** and **COMMENT** on the risks presented.

### **6.** Background Documents

6.1 KCC Risk Management Policy and associated risk management toolkit on KNet intranet site. <a href="http://knet/ourcouncil/Management-guides/Pages/MG2-managing-risk.aspx">http://knet/ourcouncil/Management-guides/Pages/MG2-managing-risk.aspx</a>

#### 7. Contact details

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# Appendix 1

# **CYPE led Corporate Risks**

## Corporate Risk Register - Summary Risk Profile

Low = 1-6 | Medium = 8-15 | High =16-25

Risk No.	Risk Title	Current Risk	Target Risk	Direction of Travel since
		Rating	Rating	March 2018
CRR0001	Safeguarding – protecting vulnerable children	15	15	⇔
CRR0007	Resourcing implications arising from children's services demand	20	12	<b>⇔</b>
CRR0016	Delivery of new school places is constrained by capital budget pressures and dependency on the Education and Skills Funding Agency	16	12	Û
CRR0044	High Needs Funding and adequacy of support for children with SEND	20	12	NEW

NB: Current & Target risk ratings: The 'current' risk rating refers to the current level of risk taking into account any mitigating controls already in place. The 'target residual' rating represents what is deemed to be a realistic level of risk to be achieved once any additional actions have been put in place. On some occasions the aim will be to contain risk at current level.

The overall risk score is derived from multiplying the likelihood and impact scores

Likelihood & Impact Scales					
Likelihood	Very Unlikely (1)	Unlikely (2)	Possible (3)	Likely (4)	Very Likely (5)
Impact	Minor (1)	Moderate (2)	Significant (3)	Serious (4)	Major (5)

Risk ID CRR000	1 Risk Title S	afeguarding – protectin	g vulnerable childi	ren	
Source / Cause of risk  The Council must fulfil its statutory obligations to effectively safeguard vulnerable children.  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 being drawn into terrorism.  This risk links to the demand for children's services risk (CRR0007).	Risk Event  Ability to fulfil statutory obligations affected by demand for services exceeding capacity and capability, or adequacy of management and operational practice.  Failure to recruit and retain suitably experienced and qualified permanent staff.  Failure to meet the requirements of the "Prevent Duty" placed on Local Authorities.	Consequence Serious impact on vulnerable people. Impact on ability to recruit the quality of staff critical to service delivery. Serious operational and financial consequences. Attract possible intervention from a national regulator for failure to discharge corporate and executive responsibilities. Incident of serious harm or death of a vulnerable child.	Risk Owner  Matt Dunkley Corporate Director Children, Young People and Education (CYPE)  Responsible Cabinet Member(s): Roger Gough Children, Young People and Education Mike Hill (Lead Member for PREVENT)	Current Likelihood Possible (3)  Target Residual Likelihood Possible (3)	Current Impact Major (5)  Target Residual Impac Major (5)
Control Title				Control Owner	
Consistent scrutiny and performance monitoring through Divisional Management Team, District 'Deep Dives' and audit activity			t Team, District		Director of Integrated a's Social Work Lead)
Independent scrutiny by	Kent Safeguarding Children Bo		Independent Chair Board	r Kent Safeguarding Childre	
Manageable caseloads per social worker and robust caseload monitoring. Social work vacancies monitored with action taken to address as required					Director of Integrated n's Social Work Lead)
	to attract, recruit and retain soc experienced social workers	ial workers through a var	iety of routes with		Director of Integrated and a North Lead)/

	Amanda Beer, Corporate Director Engagement, Organisational Design & Development (EODD)
Multi-agency public protection arrangements in place	Risthardh Hare, Interim Assistant Director Safeguarding and Quality Assurance
Extensive staff training – Specialist Children's Services and Early Help and Preventative services are adopting the 'Signs of Safety' model of intervention, a standardised child-focused model of risk analysis, risk management and safety planning	Sarah Hammond, Director of Integrated Services (Children's Social Work Lead) / Stuart Collins, Director Integrated Services (Early Help and Preventative Services Lead)
Regular reporting on safeguarding takes place quarterly for Directors and Cabinet Members, with an annual report for elected Members, to allow for scrutiny of progress	Matt Dunkley, Corporate Director, CYPE
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 Board)	Penny Southern, Corporate Director, Adult Social Care and Health (ASCH)
Kent Channel Panel (early intervention mechanism providing tailored support to people who have been identified as at risk of being drawn into terrorism) in place	Nick Wilkinson, Prevent and Channel Strategic Manager
Multi-agency risks, threats and vulnerabilities group focuses on PREVENT, gangs, Modern slavery, human trafficking and online safeguarding matters	Nick Wilkinson, Prevent and Channel Strategic Manager
Safeguarding and Quality Assurance Unit conducts audits, reviews of practice and provides challenge	Sarah Hammond, Director of Integrated Services (Children's Social Work Lead)
Education Safeguarding Team in place	Claire Ray, Principal Officer Education Safeguarding, The Education People
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	Keith Abbott, Director Education Planning & Access/ Scott Bagshaw, Head of Admissions & Transport
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	Risthardh Hare, Interim Assistant Director Safeguarding and Quality Assurance
Multi-agency Crime and Sexual Exploitation Panel (MACSE) provides a strategic, county-wide, cross-agency response to Child Sexual Exploitation	Matt Dunkley Corporate Director, CYPE (KCC lead)
Three year PREVENT training strategy being rolled out. Staff intranet site dedicated to Prevent. Information also available on KCC website	Nick Wilkinson, Prevent and Channel Strategic Manager
Integrated practice model in place	Sarah Hammond, Director of Integrated Services (Children's Social Work Lead) / Stuart Collins, Director Integrated Services (Early Help and Preventative Services Lead)
Detailed understanding of requirements for Joint Targeted Area Inspections	Sarah Hammond, Director of Integrated

Kent and Medway Gangs Strategy 2018-21 outlines the multi-age criminal exploitation of vulnerable children and adults by gangs	Services (Children's Social Work Lead) Stuart Collins, Director Integrated Services (Early Help and Preventative Services lead)	
Action Title	Action Owner	Planned Completion Date
Preparation for new multi-agency safeguarding arrangements in response to Children & Social Work Act requirements	Matt Dunkley, Corporate Director CYPE / David Whittle, Director SPRCA	April 2019 (review)

Risk ID CRR00		Resourcing implications			
Source / Cause of risk  Local Authorities continue to face ncreasing demand	Risk Event High volumes of work flow into Early Help and Preventative Services (EHPS) and Specialist	Consequence Children's services performance declines as demands become unmanageable.	Risk Owner Matt Dunkley, Corporate Director CYPE	Current Likelihood Likely (4)	Current Impact Major (5)
for specialist children's services due to a variety of factors, including consequences of highly publicised child protection incidents and serious case reviews, a marked increase in children with Special Educational Needs and Disabilities (SEND) and policy/legislative changes.	Children's Services (SCS) leading to unsustainable pressure being exerted on them (recognising seasonal spikes such as end of term). Failure to maximise opportunities offered by integration of EHPS and SCS where appropriate.	Failure to deliver statutory obligations and duties or achieve social value.  Additional financial pressures placed on other parts of the Authority at a time of severely diminishing resources.  Ultimately an impact on outcomes for children, young people and their families.	Responsible Cabinet Member(s): Roger Gough Children, Young People and Education	Target Residual Likelihood Possible (3)	Target Residual Impac Serious (4)
At a local level KCC is faced with particular 'pressure points' in several districts.					
These challenges need to be met as early help and preventative services and specialist children's services face increasingly difficult financial circumstances and operational					

chal	lenges.
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The Council needs to remain aware of London Boroughs, utilising higher percapita funding and large capital/reserve budgets to procure sites in Kent to ease their overspends on housing/homelessness, due to potential demand implications.

Control Title	Control Owner	
The Early Help and Preventative Services Programme is workin families can access the right support through intensive work in Panels, open access services or through targeted casework	Stuart Collins, Director Integrated Services (Early Help and Preventative Services Lead)	
Intensive focus on ensuring early help to reduce the need for sp services	Matt Dunkley, Corporate Director CYPE	
Early Help & Preventative Services have outlined priorities for sincluding ambitious targets to improve outcomes for children, you	Stuart Collins, Director Integrated Services (Early Help and Preventative Services Lead)	
Kent Safeguarding Children Board 'threshold' document outline when making a referral and have been working with partners to application	Mark Janaway, Programme and Performance Manager	
The Specialist Children's Services budget has been increased t demand	Dave Shipton, Acting Section 151 Officer	
Relationships with London Councils which allow us to understaindividual site basis	David Whittle, Director SPRCA	
Action Title	Action Owner	Planned Completion Date
Implementation of Change for Children in Kent programme	Matt Dunkley, Corporate Director, CYPE	April 2019 (Phase 1)

Risk ID CRR00		elivery of New School Plependency upon the Edu			
Source / Cause of risk A significant expansion of schools is required to	Risk Event The expansion required may not be delivered, meaning KCC is not able to provide appropriate school places.	Consequence Some children have to travel much further to attend a school, with a resulting impact on the	Risk Owner Matt Dunkley, Corporate Director CYPE	Current Likelihood Likely (4)	Current Impact Serious (4)
accommodate major population growth in the short term to medium term (primary age) and medium to long term (secondary age). The "Basic Need" capital grant from Dept of Education (DfE) will not fund the	Further upward demand pressures beyond what is forecast.	transport budget. The duty to provide sufficient school places is not met, which may lead to legal action against the council.	Responsible Cabinet Member(s): Roger Gough, Children, Young People and Education	Target Residual Likelihood Likely (4)	Target Residual Impact Significant (3)
expansion in full.  A funding gap to deliver the programme for schools will be created by cost pressures from higher than expected build costs, low contributions from developers and increases in pupil demand.					
Whilst the funding gap identified with the Kent Commissioning Plan has been closed, the delivery of the plan is highly dependent					

upon securing a number of Free Schools in Kent over the period and that the ESFA complete the Free School projects on time and to an appropriate standard.

Control Title		Control Owner	
	The Kent Commissioning Plan contains the forecast expansion numbers and locations. A school expansion programme has been mapped, costed and kept under review		
The school expansion programme is under member scrutiny an and Property programme boards/forums/committees	d review by relevant Education	Keith Abbott, Director Education Planning and Access	
CYPE capital monitoring mechanism with Member involvement	now created	Education Planning and Access DivMT	
Policy and operations to secure sufficient developer contribution Infrastructure Group	Keith Abbott, Director Education Planning and Access/Stephanie Holt-Castle, Interim Director Environment, Planning and Enforcement		
A bid has been made for extra funding under the priority school	Keith Abbott, Director Education Planning and Access		
Negotiations have taken place with District Councils regarding a	Area Education Officers		
Close working with the ESFA and lobbying of the DfE/ESFA, Se raising of the issue via the County Councils Network	Keith Abbott, Director Education Planning and Access / Cabinet Member CYPE / Leader of the Council		
Regular meetings with ESFA officials to monitor progress at ind ways in which KCC can help progress these projects (Local deli		Keith Abbott, Director Education Planning and Access	
Contingency plans for alternative interim accommodation for ea developed on a case-by-case basis i.e. temporary expansions to pressures, or the allocation of available places within existing so	Keith Abbott, Director Education Planning and Access		
Action Title	Action Owner	Planned Completion Date	
Put forward bids for the next wave of selective schools'	Keith Abbott, Director of	July 2019	

expansion fund		Education			
Risk ID CRR00	44 Risk Title Hi	gh Needs Funding and a	dequacy of suppo	rt for children w	ith SEND
Source / Cause of risk The Children and Families Act 2014 introduced significant changes to Specialist Educational Needs (SEN) through the duty to ensure that the views, wishes	Risk Event There is a risk that the SEN service within KCC will fail to deliver an acceptable service to parents and children requiring SEN services within Kent, and/or fails to meet statutory time limits for providing support.	Consequence Unless processes and practices are reviewed and made to be more efficient and effective, families may fail to receive a supportive, acceptable service from SEN within Kent. Families feel neglected	Risk Owner  Matt Dunkley Corporate Director CYPE	Current Likelihood Likely (4) Target Residual Likelihood Possible (3)	Current Impact Major (5) Target Residual Impact Serious (4)
and feelings of parents are heard, leading to a raising of expectations of parents.  The number of Children and Young People with Specialist Educational Needs		and supported. Ultimately the delivery of such a level of service could lead to legal action if statutory time limits or processes are not met.	Responsible Cabinet Member(s): Roger Gough Children, Young People and Education		
and Disability (SEND) is rising faster than the underlying growth in population. Kent is now maintaining over 10,500 Education Health and Care Plans (EHCP) which					
represents a growth of over 40% in the last 4 years. In addition, the incidence of EHCP's being maintained and issued to young					

people aged 19+ has grown exponentially.

The available budget is not enough to address the growth in demand, and the level of DSG High Needs Funding is effectively capped for the next 4 years.

KCC needs to address a backlog of over 650 Educational Psychology assessments.

Control Title		Control Owner
Continual lobbying of Government to highlight the matter at nati Network, Association of Directors' of Children's Services	Paul Carter, Leader of the Council / Roger Gough, Cabinet Member CYPE / Matt Dunkley, Corporate Director CYPE	
Recruitment and Retention arrangements for Educational Psychenable us to recruit and retain staff in our most critical and demanded	Andrew Heather (Principal Educational Psychologist)	
A Special Educational Needs Action Plan has been prepared		Louise Langley (Interim Head of SEN)
SEN Provision Evaluation Officers now support SEN Teams wit their best endeavours to seeking Statutory Assessment and the	Louise Langley (Interim Head of SEN)	
Weekly placement panels implemented for independent school local provision is preferred).	Louise Langley (Interim Head of SEN)	
CYPE Service Development Team supporting improvements by development project.	Louise Langley (Interim Head of SEN)	
Contracts with independent schools stipulate financial penalties pupils	Louise Langley (Interim Head of SEN)	
Action Title	Action Owner	Planned Completion Date
Triage backlog of Educational Psychology assessments and consider priorities. West Kent pilot completed – wider rollout in	Andrew Heather, Principal Educational Psychologist	March 2019

progress.		
Moderation of EHCPs to ensure compliance to expected standards	Louise Langley Interim Head of SEN	January 2020
Increase the numbers of pre-emptive meetings and mediation with parents to seek resolution	Louise Langley Interim Head of SEN	July 2019
Increase mainstream school's capacity to meet SEN provision	Louise Langley Interim Head of SEN	July 2020
Work with the Disabled Children's Service to develop joint pathways into adulthood for post 16 and post 19 SEND young people	Louise Langley Interim Head of SEN	April 2019
For young people with the most severe and complex needs, develop a process for working with social care and health to support and plan lifespan pathways from year 10 annual reviews onwards	Louise Langley Interim Head of SEN	April 2019
Appointment of additional posts to provide additional focus on quality issues and early resolution of complaints	Matt Dunkley, Corporate Director, CYPE	May 2019
QA (Quality Assurance) Panels are to be created to moderate EHCPs and ensure quality	Louise Langley Interim Head of SEN	July 2019