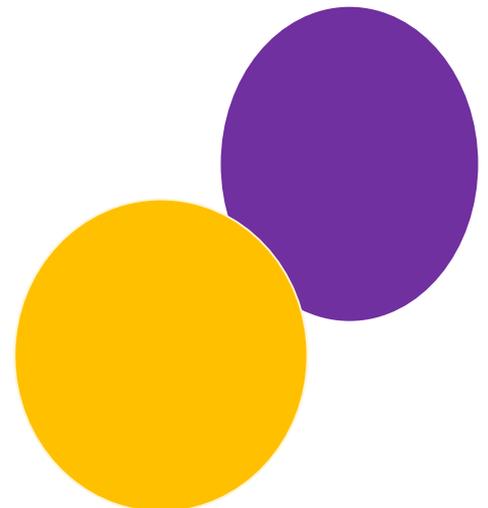


Developing Arrangements for Children and Young People with Social Emotional and Mental Health needs in Lancashire

Outcomes of data analysis and discussions with Short Stay Schools, Secondary Schools and Academies.



Section 1: Data, information analysis, national and local context

Section 2: Discussions, big issues and recommendations

Section 1:

Examining arrangements for secondary pupils with Social Emotional and Mental Health needs in Lancashire

Outcomes and recommendations
Nov 2018- Feb 2019

1. Introduction

- 1.1 As part of its ongoing response to its local area SEND review published in January 2018, Lancashire County Council embarked upon a review of the current arrangements for secondary aged pupils with Social Emotional and Mental Health (SEMH) needs and the related level of secondary school permanent exclusions. Local Authority officers examined the characteristics of schools with high and low levels of exclusions in Lancashire and began to consider how the best practice evident in some schools could be shared. The review of SEMH arrangements was completed at an opportune time in the light of the national debate about school funding, exclusions and approaches to meeting the social emotional and mental health needs of children and young people.
- 1.2 Lancashire County Council has commissioned SEND4Change, an independent organisation, to further examine the issues around SEMH provision and secondary permanent exclusions and to begin to engage schools in a system leadership-based delivery model. SEND4Change is a special educational needs consultancy with expertise in developing new models of delivery for local authorities in relation to arrangements for children and young people with social, emotional and mental health needs (SEMH).
- 1.3 This report has been produced in two parts.

Part 1: Describes the national context in relation to current arrangements, the consultation process undertaken and contextual information about current situation in Lancashire.

Part 2: Describes emerging themes from conversations with stakeholders and concludes with a number of key Issues and recommendations for consideration by the Local Authority and suggested actions to implement change.

Although the ultimate decision regarding the future direction of travel rests with the LA, this will need to be based on a good understanding of the view of teachers, PRU leaders and other partners. The success of any new arrangements will be highly dependent upon the engagement, commitment and beliefs of Lancashire's school leaders.

2. Purpose and aims of the Review

- 2.1 SEND4change was commissioned to look at a range of local and national data in relation to exclusions and alternative provision (AP) and to engage in a series of conversations with schools and key partners during the period November 2018 to Feb 2019 about arrangements for pupils with SEMH needs in Lancashire.
- 2.2 The work aimed to:
- consider existing arrangements
 - compare Lancashire to national data in terms of SEMH provision
 - compare Lancashire's spend on SEMH needs
 - provide recommendations to the County Council, with a basis for a new approach for pupils with SEMH needs, to bring about change and improvements through a phased implementation of new arrangements which:
 - build on existing positive arrangements
 - establish new partnerships between schools, the Local Authority and other partners
 - achieve best value from available resources
 - support Lancashire's most vulnerable learners, by ensuring that Lancashire has sufficient specialist provision in place to meet the needs of this group.

3. What is meant by pupils with SEMH difficulties?

- 3.1 The Special Educational Needs and Disability Code of Practice: 0-25 years published by the Department for Education introduced a new category of SEN known as Social, Emotional and Mental Health (SEMH). This replaces the previous category of Social, Emotional and Behavioural Difficulties (SEBD) which focussed on pupils' behaviour and is a helpful development.
- 3.2 Paragraph 6.32 of the SEND Code of Practice provides the following definition of the category of need known as social, emotional and mental health difficulties:

“Children and young people may experience a wide range of social and emotional difficulties which manifest themselves in many ways. These may include becoming withdrawn or isolated, as well as displaying challenging, disruptive or disturbing behaviour. These behaviours may reflect underlying mental health difficulties such as anxiety or depression, self-harming, substance misuse, eating disorders or physical symptoms which are medically unexplained. Other children and young people may have disorders such as Attention Deficit Disorder or Attention Deficit Hyperactivity Disorder or attachment disorder”.

- 3.3 Professionals need to be aware that persistent disruptive or withdrawn behaviours do not necessarily mean that a child or young person has SEN. Where concerns arise, there should be an assessment to determine whether there are any causal factors such as undiagnosed learning difficulties, difficulties with communication or mental health issues. Housing, family or other domestic circumstances may be contributing to the presenting behaviour and require a multi-agency approach. It is acknowledged that in all such cases, early identification and intervention are critical and can significantly reduce the use of more costly intervention at a later stage.
- 3.2 Throughout the most recent research (**Investigative research into alternative provision. Professor Martin Mills and Professor Patricia Thomson IFF research Ltd Published by DFE (October 2018)**) and this report the terms pupil referral unit (PRU) and Short stay school refer to the same type of organisation,

4. National context

- 4.1 It is well recognised that the national picture of school behaviour is complex and that standards of behaviour remain a significant challenge for many schools. Nationally, local authorities have made a variety of arrangements to support the learning of this group of vulnerable but challenging young people through partnerships with schools and other partners.
- 4.2 The Department for Education (DfE) over the last three years has published several important publications which have promoted a national debate and re-evaluation of services and provision for young people who are at risk of permanent exclusion as a result of their SEMH needs.

4.2.1 ***White Paper: “Educational Excellence everywhere”***

The beginning of the new strategic direction of Alternative Provision (AP) was previously set out in the White Paper published in March 2016 entitled ‘Educational Excellence everywhere’. This paper described the Government’s plans for education up to 2020 and identified new roles and responsibilities for key stakeholders. The white paper was far reaching and included a commitment to reform the AP system so that mainstream schools remain accountable for the education of pupils in AP and are responsible for commissioning high quality provision. Since this paper was published further developments have been made based on this commitment.

4.2.2 ***Report on the Independent review of behaviour in schools – “Creating a culture: How school leaders can optimise behaviour” published by Tom Bennett (April 2016)***

In 2016, the Government published its independent review of behaviour in schools. This report was commissioned to help



identify evidence of effective strategies so that school leaders can “optimise behaviour” among their pupils. The review was led by the Government’s behaviour expert Tom Bennett and put forward five key recommendations. Although this report is now slightly dated, the recommendations remain valid and were as follows:

1). Use behaviour audits to create a national data map

The report called for a new national standardised method for capturing data on school behaviour that “goes beyond the present formal recording methods”.

Bennett suggested that the behaviour audit could take the form of an anonymous survey with both quantitative and qualitative yardsticks. He explained this could be used to create an anonymised data map of school behaviour to compare schools over time, and against other schools. Information recorded could include the types of misbehaviour, and how much lesson time is lost through dealing with behaviour.

2). These behaviour audits could be used by Ofsted during inspections

Bennett said Ofsted inspectors could utilise the behaviour audits to ensure they have “appropriate access to the view of the range of staff and pupils” at a school.

The proposals formed part of a wider recommendation for Ofsted to review its processes for obtaining the views of staff and pupils – ensuring they target the “most vulnerable and at-need staff” such as trainees, supply teachers, and catering staff.

3). Incentivise trusts to pool resources for SEND and AP funding

Bennett flagged up that “further discussion” was needed about the way special educational needs and disabilities (SEND) and alternative provision is funded, both in mainstream schools and specialist sites. He suggested that schools in clusters, such as multi-academy trusts, could be incentivised to pool resources and share expertise.

Another incentive would be to make schools responsible for excluded pupils, and have control over alternative provision funding. Bennett said this would ensure exclusions are only used where necessary. The report also stated that a follow-up study could investigate the best practice in APs and pupil



referral units so head teachers have better guidance about how to support the most challenging pupils.

4). Fund ‘internal inclusion units’ in schools

Bennett urged the Government to find the cash for internal inclusion units at schools with higher than average levels of challenging behaviour. The units would offer “targeted early specialist intervention” with the primary aim of reintegrating pupils back into mainstream schools.

5). Set up new optional training scheme for head teachers

Bennett wants a revised certification process for all head teachers. He said this would include a requirement to demonstrate an “appreciation of behaviour cultural levers and how to use them”. The report also called on the Government to set up an optional training scheme for school leaders. This would give them access to training in a range of behavioural strategies and examples of best practice.

He added a pilot scheme could be trialled in areas of “identified need” (which could also be extended include the Government’s ‘opportunity areas’)

4.2.3 Investigative research into alternative provision. Professor Martin Mills and Professor Patricia Thomson IFF research Ltd Published by DFE (October 2018)

This was a large scale investigative research study exploring the landscape of Alternative Provision (AP). The observations covered a wide range of needs and provisions. Some relevant points:

- Schools recognised that a holistic approach to SEMH needs was beneficial but often systems, processes or practice worked against this.
- There was a lack of systematic evaluation of schools’ approaches to meeting needs – very few schools carried out formal reviews.
- Alternative providers reported that direct referrals were most effective – i.e. direct from schools not via the LA.
- Any reintegration for key stage 4 pupils was problematic and this continued into post 16 provision. These pupils were 6/7 times more likely to be not in education, employment or training (NEET).

- The curriculum remained a challenge for many Alternative Providers – the links to mainstream that could help remedy this were rare.

4.2.4 Alternative Provision: Market Analysis ISOS Partnership (DFE Published October 2018)

The Government announced its vision for reforming Alternative Provision (AP) in March 2018. This includes building a strong evidence base about how AP operates and how to improve outcomes for pupils at classroom, institution and local area level. The research aimed to provide an evidence base for the components of an effective local AP system. The research found that:

- 76% of Local Authorities had ‘centralised’ arrangements where responsibilities for high needs block funding for AP, shaping local provision and making decisions about placing pupils sat with the LA.
- 24% of Local Authorities had ‘devolved’ arrangements where some or all of these responsibilities for funding, provision and placements were devolved to schools either individually or in local partnerships.

This research indicated that local areas with ‘devolved’ arrangements:

- were more likely to use AP for preventative reasons
- had fewer secondary age pupils in AP
- had fewer pupils elective home educated (EHE)
- had lower rates of secondary Permanent Exclusion
- were more likely to have AP spend in line with budget.

An essential pre-condition for a well-functioning AP system is one in which mainstream schools have a strong individual and collective responsibility for pupils placed in AP.

4.3. An area not covered by this work but actually central to the overall provision in SEMH provision is the nationally recognised increase in mental health needs presenting themselves within the school population. Recent government initiatives have called for a mental health lead to be part of the staff in all schools. In some areas this has been matched by a real engagement between education and health ensuring services are more readily available through partnership work and joint commissioning.

4.4 The high level of exclusions in some areas has been commented on by Ofsted. **TES February 2018 ‘Ofsted attacks high exclusion rates in the North’** and we have some evidence of

high exclusion rates effecting judgements despite inspectors only observing very good behaviour. Also, in her 2018 annual report the chief Inspector Amanda Spielman raised concerns over the 19000 pupils who ‘dropped off’ school rolls between years 10 and 11. This has been picked up in the latest proposed framework for inspection – proposed for September 2019 where it states inspectors will consider this figure in schools. The new framework also has elements that promote inclusive practice for example in leadership and management leaders are expected to **“have a clear and ambitious vision for providing high quality inclusive education”** and in the same section of the framework **‘leaders aim to ensure that all learners complete their programme of study.’**

- 4.5 It is clear from these publications and subsequent emerging comments from the Government that it is the intention to increasingly focus on the plight of young people who are at risk of permanent exclusion or being ‘off-rolled’.
- There is a huge ground swell of knowledge and information about the impact of permanent exclusion and mental health issues on educational performance. This will clearly need to be addressed by Local Authorities, Mental Health services and schools. The Government also recognises the benefits of schools in an area working collectively to meet the needs of pupils with SEMH needs and challenging behaviour. These factors have therefore informed the conversations with stakeholders in Lancashire

5. Lancashire Exclusions **context: Commissioning, SEMH Spend and**

Local Context

- 5.1 Lancashire is a large and diverse local authority. It has a total school population of 181,000 of which 67,000 are secondary aged pupils. Lancashire is the fourth largest local authority. It covers a geographical area of 2903 Km². A range of services are organised into the 12 Districts of Burnley, Chorley, Fylde, Hyndburn, Lancaster, Pendle, Preston, Ribble Valley, Rossendale, South Ribble, West Lancashire and Wyre. However, there are ‘variations’ in relation to the way in which Lancashire is divided for services. There is also some difference of understanding of service arrangements within and between local authority departments.

Lancashire County Districts



Lancashire Schools and Number of Pupils

Type	Number of Schools	Pupils
State funded Secondary	85	67,000
State funded Primary Inc Nursery	506	103,000
State funded Special Inc primary	30	2,787
Pupil referral Units Inc primary	10	518
Independent	54	7,000

(census Jan 2018)

- 5.2 In the January 2018 School Census, of the 181,000 children on roll in Lancashire schools, 2,787 were placed in special schools (1.5% of the total). 5,200 had EHC plans which is 2.9% of the total. The percentage of the school population with a statutory plan is slightly above the national average (2.8%). The % of SEMH places in special schools in Lancashire was above the national average - 14.2% in Lancashire with a national average of 12.5%.
- 5.3 The January 2018 census indicates that 15.1% of Lancashire's secondary population have Social Emotional and Mental Health (SEMH) needs as opposed to a national average of 18.4%.
- 5.4 In terms of deprivation, Lancashire contains both disadvantaged as well as affluent areas. The level of deprivation in schools can vary greatly even within Districts. However, using Free School Meals (FSM) as an indicator overall, Lancashire's secondary population (12.2%) is just below the national average (12.4%).

Commissioning

Secondary Special Schools providing SEMH places

School with SEMH designation	Capacity/NOR	Designated SEMH places
Hope High	64/69	53
Moorbrook School	45/41	35
Brookfield School	52/61	55
The Rose School	63/63	55
Wennington Hall	80/59	51
TOTAL	304/293	249

Alternative Provision: PRU Commissioned Places

School	Type	Phase	Maintained or Academy	2017/18 Commissioned Places	2018/19 Commissioned Places
Chadwick High School	PRU	Secondary	Maintained	76	90
Mckee College House	PRU	Secondary	Maintained	98	125
Shaftesbury High School	PRU	Secondary	Maintained	120	130
Larches High School	PRU	Secondary	Maintained	130	140
Oswaldtwistle School	PRU	Secondary	Maintained	82	90
The Acorns School	PRU	Secondary	Maintained	73	90
Coal Clough Academy	PRU	Secondary	Academy	108	140
				<hr/>	<hr/>
				687	805

5.5 Additionally, the LA commissions additional places (40) at colleges on an individual basis.

5.6 The LA estimates that the total commissioned places at PRUs and Colleges will be in the region of 860 for 2018/19. The most recent research into this area **Alternative Provision: Market Analysis ISOS Partnership DFE Published (October 2018)** covered 118 LAs and indicated a national average of 88 places per 10,000 of pupil population for secondary pupils. This would mean that to be at national average Lancashire would commission 590 places (Secondary population of 67,000 – 88 places per 10,000 = $88 \times 6.7 = 589.6$).

5.7 The Local Authority also uses independent non-maintained (INM) providers. In 2017/18 some 245 places including full and part-time were commissioned to meet SEMH needs from 30 plus suppliers.

5.8 Commissioning Summary for Lancashire

In Lancashire:

- there is a higher number of pupils in special schools (1.5%) compared to the National Average (1.3%).
- there is a higher proportion of special school places catering for SEMH needs (14.2%) compared to the National Average (12.5%)
- the LA commissions significantly more PRU/AP places than the national average of 590 compared with plans in Lancashire to commission 860 places for 2018/19.
- the 2018 school census shows SEMH needs in Lancashire secondary schools to be below average at 15.1% compared with a National Average of 18.4%.

SEMH Spend

5.9 The vast majority of funding to make provision for pupils with SEMH needs comes from the High Needs Block. A small proportion is funded directly from some mainstream schools but that is not accounted for in this report other than it being contained in the mainstream schools' budgets (schools block).

Lancashire overall funding is as follows:

DSG Funding and High Needs Block Analysis		
	2017-18	2018-19
	£	£
Total DSG Allocation	881,815,838	909,399,150
Schools Block	714,671,283	727,855,210
High Needs Block	98,814,011	100,953,166
Early Years Block	68,330,544	74,156,161
Central Schools Services Block	-	6,434,613
	881,815,838	909,399,150
High Needs Budget		
Central Support Services	1,176,330	-
Commissioned Provision	27,503,000	28,768,418
Top-Up Funding	40,237,563	48,540,425
Place Funding	33,943,527	32,178,833
	102,860,420	109,487,676
High Needs Funding Gap	4,046,409	8,534,510

5.10 Lancashire Council's current arrangements for secondary aged young people with SEMH needs are delivered through the following range of provision and Local Authority services:

- 4 day special schools
- 1 special school with residential provision
- 6 maintained PRUs
- 1 AP academy
- Key Stage 4 Alternative provision at Colleges
- INM placements

The cost of this provision is as follows:

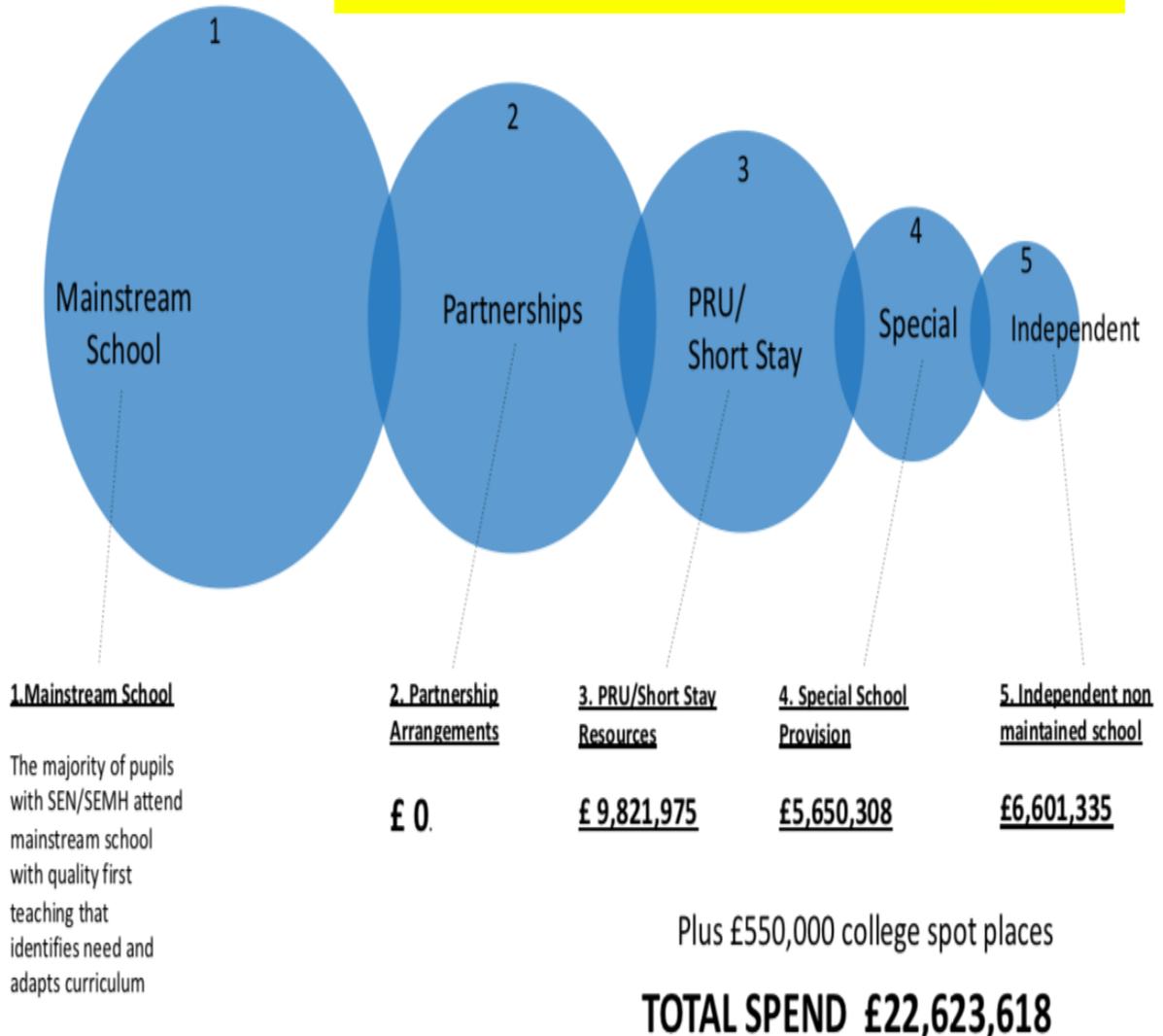
Provision	17/18 Actual Cost to LA	Notes
Special Schools	£ 5,650,308	Not actual – based on average cost x number of places
PRUs	£ 8,858,360	Does not include top ups from schools
AP Academy (top up only)	£ 963,615	Direct funding from FA not included here.
Spot commissioned places (i.e. colleges)	£ 550,000	
Independent Non-maintained places	£ 6,601,335	Range of costs vast from 10 to 100K + Average 30K
TOTAL	£ 22,623,618	Real cost will be+ £1M because of direct funding from FA

- 5.11 Information relating to actual funding for the special schools has not yet been received but a range of average costs per place are available. These have been used and special school costs have been calculated based on the lower average cost per place multiplied by the number of SEMH places.
- 5.12 The breakdown of PRU costs are shown in the chart below. However, this does not contain the place element paid to the Academy directly from the Funding Agency. Based on the number of places commissioned by Lancashire in 2017/18 this would be an additional £1,080,000.*
- 5.13 The other variable is that some schools commissioned places directly and paid the top-up element to the PRU (place funding was paid by the LA). The figures for the amount of top-up funding paid directly by schools is not available and is not recorded here. Hence, the exact cost per place is difficult to calculate. Costs per place are likely to be circa £16/17,000 per pupil.

Alternative Provision Funding: Actual Costs 2017/18

School No	Type	Phase	Maintained or Academy	Total
Chadwick High School	PRU	Secondary	Maintained	1,119,390
Mckee College House	PRU	Secondary	Maintained	1,746,327
Shaftesbury High School	PRU	Secondary	Maintained	1,757,609
Larches High School	PRU	Secondary	Maintained	1,879,821
Oswaldtwistle School	PRU	Secondary	Maintained	1,290,962
The Acorns School	PRU	Secondary	Maintained	1,064,251
Coal Clough Academy	PRU	Secondary	Academy	963,6158*
*Top up funding only ** real cost would include additional £1.080,000 place funding for academy				<u>9,821,975 **</u>

A Graduated Model - Lancashire Secondary SEMH



Exclusions

5.14 The permanent exclusion rate from Lancashire secondary schools is high. In the 2017/18 academic year there were 314 permanent exclusions from secondary schools and academies in Lancashire. The following table breaks this down into administrative districts used by the School Access team. (Note this data from schools access team totals 81 secondary schools – Dfe Schools, Pupils and their Characteristics 2018 data set records 85)

District	No of schools/ academies	PEX Schools	P Ex Academies	District total
Lancaster	8	40	1	41
Wyre	7	15	1	16
Fylde	3	16		16
Preston	12	44	8	52
South Ribble	11	25	14	39
West Lancs	7	25	2	27
Chorley	6	5	7	12
Hyndburn & Ribble valley	10	22	7	29
Burnley	5	27		27
Pendle	6	23	8	31
Rossendale	6	24		24
Lancashire TOTAL		266	48	314

- 5.15** National data from 2016/17 (298 PEX) shows Lancashire to exclude at a rate 2.5 times higher than the national average.
- 5.16** Lancashire Educational Psychology Service carried out an investigation into high and low excluding schools. This also included schools which had moved from high exclusions to low. **Appendix 2** shows their findings in table form.
- 5.17** The detail of conversations with school leaders and what we think needs to happen are included in **Part 2** of this report. Part 2 also sets out a number of recommendations for consideration by the Local Authority and secondary schools.

Exclusions Summary

- 5.18** 2016/17 national data showed Lancashire to be a high excluding authority with 298 permanent exclusions, the authority's own data shows this high excluding trend has been maintained with 314 permanent exclusions in 2018. The full year cost of 314 exclusions based cost of average PRU place is over £5 million.
- 5.19** Schools and districts do not have accurate up to date data on exclusions available to them. They do not have the opportunity to compare themselves to other districts or indeed to their own previous performance. Schools spoken to would welcome this opportunity.

Section Two

Conversations with schools, big Issues and recommendations

6. Conversations with Schools

- 6.1 Several groups of head teachers were visited and asked about their experiences and use of the current Alternative Provision arrangements. These conversations included head teachers of the short stay schools (PRUs) who were consulted both as a specific group and then again as part of their district head teachers' group.
- 6.2 Due to the timelines for this review and the schedule of district meetings, it was not possible for every district to accommodate a visit. However, written evidence was provided by some head teachers and all had the opportunity to engage following a subsequent meeting of Lancashire Secondary Heads. (summary of consultation meetings in **Appendix 1**)

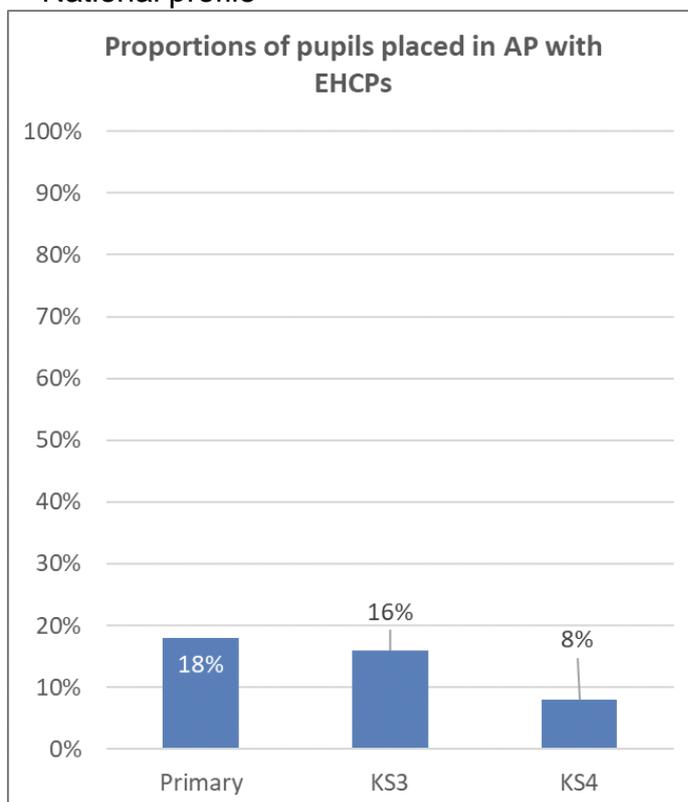
Short stay schools/pupil referral units (PRUs)

- 6.3 The PRU head teacher network provided comprehensive information in terms of historical developments, discussions with the Local authority about provision and descriptions of current practice and issues.
- 6.4 The PRU head teachers indicated that they lacked confidence in the Local Authority delivering any significant change that would improve current arrangements. They shared minutes of previous meetings where actions had been promised but, from the PRU head teachers' perspective, these had never been delivered.
- 6.5 As with most headteachers, they felt under resourced to do the job required of them. Some felt that the current funding structure made the situation worse in that planning and making strategic responses to need were very difficult with a funding profile that could vary termly.
- 6.6 All PRU head teachers indicated that they were keen to be more flexible and work preventively with mainstream schools rather than simply wait for excluded pupils to arrive. Many had tried to do this on a small scale through local arrangements but found that it was difficult to deliver this 'model' due to other pressures to provide full-time commissioned places.
- 6.7 Whilst this approach has worked for some individual pupils, a number of PRU Head teachers were concerned that having places for young people with mental health and anxiety related issues on the same site as a high number of young people with challenging and sometimes aggressive behavior was not desirable and compromised the quality of both provisions.



- 6.8 Head teachers of the PRUs stated that they often felt that they were the “dumping ground” for receiving the pupils that no-one else wanted. There was a feeling that some pupils were too easily excluded from some mainstream schools whilst at the other end of the spectrum there was the perception that special schools often refused admission of pupils who had attended the PRU. The PRUs stated that they felt ‘trapped in the middle’.
- 6.9 Data provided by the PRUs from November 2017 shows that there were 21 pupils who had completed the EHC plan process and were waiting for a special school place. A further 23 pupils had an EHC plan submitted. Recent research on Alternative Provision: Market Analysis ISOS Partnership DFE Published (October 2018) indicates that this represents approximately 6.4% of the PRU population which is within the average range.

National profile



Alternative Provision: Market Analysis ISOS Partnership DFE Published (October 2018)

Mainstream Schools

- 6.10 Mainstream Headteachers reported growing pressures on the whole system which made inclusion more challenging. The move to Progress 8 and the associated narrowing of the curriculum reduced flexibility and relevance for many pupils. Head teachers were pleased to note the slight shift in the Ofsted focus onto the whole quality of the educational experience. They were interested to note that some local authorities and schools were in the process of addressing this curriculum offer by reinstating school and further education partnerships and the growing of a vocational offer in some parts of the country.
- 6.11 A number of head teachers felt that the range of provision in some areas was insufficient. They highlighted that provision was not uniform or strategically tailored to the needs of a District. They felt that this was limited by a number of factors:
- geography and location of providers
 - availability of local colleges as willing partners and
 - the capacity and willingness of Alternative Provision (AP) leaders to be flexible in what was offered and how this was accessed.
- 6.12 Permanent exclusion was often seen to be the simplest and cheapest 'solution'. As a result, head teachers felt that this was a significant disincentive to be inclusive. Whilst some schools spent a significant amount on AP to avoid permanent exclusion others felt that spending significantly more than the AWPU for a number of pupils was unsustainable.
- 6.13 In a minority of cases head teachers felt that they had some influence on the commissioning/type of AP available, largely through conversations with the AP leader and/or Local Authority officer. The majority of heads felt that they had very little influence on the type and range of provision. Similarly, they felt that they had very little or no control over admissions.
- 6.14 District head teacher groups were naturally at differing levels of development in terms of relationships. Some had several newer members and relationships were developing. A number of groups described how they worked together to provide day 6 provision or where possible, supported managed moves. A number of schools in one district were implementing plans to make a shared provision for some of their pupils with SEMH needs. Nationally, there are a number of successful models of schools working together and having 'joint ownership' of provision.
- 6.15 Due to the financial restraints on both schools and the Local Authority, some head teachers could not see a solution to the growing pressures and the increase in exclusions. They were not confident of any change happening

irrespective of the findings from this review. They felt that the capacity of the Local Authority to drive change in this area was not there and the initial 'investment' to save that may be necessary, would not be forthcoming. Head teachers acknowledged that the SEMH spend on independent non-maintained provision (£6.6m) was high and that whilst some of this will be for highly complex individual needs a significant proportion of this was spent on places for young people who could and should be catered for within Lancashire. At least one PRU leader and one from more specialist higher cost provision cited several cases of pupils who were wrongly placed in more expensive provision.

- 6.16 Schools felt shared accurate up to date information would be useful in developing plans, moderating decisions and holding themselves to account. The 'full picture' should include information on:
- permanent exclusions
 - pupils leaving in year
 - pupils admitted in year
 - managed moves in and out
 - details of particular pupil groups which bring new pressure i.e. new international arrivals.
- 6.17 Schools held the view that Lancashire did not promote any particular stance on inclusive practice and exclusions and that strong leadership and direction was needed. Schools were concerned that there was no articulation of a clear strategic direction, of how schools would be supported and challenged to achieve inclusive practice. Some schools recognized the difficulties in taking this forward given the national climate of academisation and the large size and diverse nature of the county of Lancashire.
- 6.18 A number of school leaders emphasized the point that this work on SEMH needs must link in with the SEN review and development being carried out by the local authority. They rightly saw many issues interlinked. Unmet needs and the lack of early intervention were seen as major contributors to the high level of permanent exclusion.

7 Big issues arising from information analysis and head teacher Conversations

A number of actions contribute to the addressing of more than one big issue, however, they are only listed once below under their main area of influence.

Big Issue 1. Spend on SEMH

The total spend in Lancashire on SEMH outside of mainstream school is in the region of £23m. This is a substantial investment and should be more than sufficient in meeting needs. However, the high needs block is coming under increasing pressure year on year. The £6.6m spent on SEMH places in independent non-maintained provision is expensive and would be better re-invested to develop the system, expertise or local provision for future Lancashire pupils. Alternative provision should be regularly reviewed for appropriateness, in another LA we discovered a pupil at a £50,000+ provision and that provision had commissioned a full-time place at a local college at a cost of £11,000.

Big Issue 1: Actions

- i) Review appropriateness of all Independent Non-maintained placements.
- ii) Write to all independent providers requesting information on attendance, progress, attainment and notification of any safeguarding issues. Following the review reach a judgement about any placements causing concern.
- iii) Establish a system to regularly review the use of commissioned places both within the LA and independent non-maintained providers. Expensive provision is often filled by poor attenders/non-attenders, this blocks provision and inflates the number of places required – cheaper alternatives are available for these pupils.
- iv) Urgently identify the potential for re-investment of funding from any leavers or cases which can be brought back into more local provision. This should quickly establish trends, identify future needs and form a detailed plan to re-allocate a significant amount of the resource to schools and SEMH partnerships in Lancashire. Set a target of a 25% reduction in INM spend.
September 2019.
- v) Ensure that the system for approving out of authority/ independent non-maintained spend is rigorous and provides challenge to provide locally within Lancashire LA wherever possible.

Big Issue 2. Commissioning of Places/provision for SEMH

Compared to national data relative to their population, Lancashire commissions a high number of PRU/AP places. However, this masks the issue of having the right number of places in the correct areas, nor does it determine the type of places. A range of schools felt that strategic use of part-time or fixed term provision would help to reduce permanent exclusions. There is a growing level of complexity of need arising in pupils with SEMH difficulties. However, schools felt that access to specialist support was becoming more difficult.

Big Issue 2: Actions

- i) Identify three district Phase One ‘Early Adopters’ to work in partnership to pilot the role of schools and to act as local commissioners of Alternative Provision. These partnerships will need to develop the commissioning process, determine the types of provision to be commissioned, the arrangements for accessing the provision and monitor expenditure against the budget.

Big Issue 3. Leadership and Governance

At the highest level Lancashire should determine its philosophy and approach to inclusion and ensure that this is known and understood by schools and providers. School leaders should be engaged in this process so that there is a joint mission. This will help to generate a clarity of expectation on how schools can be supported and challenged to make the system more effective. School governors should be clear in their role in both supporting and challenging the school in meeting the needs of pupils with SEMH.

Big Issue 3: Actions

- i) With immediate effect, Local Authority leaders together with school leaders should provide an unequivocal statement of intent about the purpose and ambition of this inclusive initiative which includes the aspirations and expectations required of schools and groups of schools in Lancashire. This should be underpinned by a clear sense of moral purpose and commitment to Lancashire’s most vulnerable young people.
- ii) Establish a Governance Board with responsibility for the oversight of the implementation of the initiative. The Board should have senior strategic representation from schools, CAMHS and Early Help and SEND Services.
- iii) Training should be provided for school leaders and school governors to raise awareness of the strategic intentions and the practicalities and opportunities that these new arrangements present.

Big Issue 4. OFSTED Pressures

The pressures of performance and attainment affect all schools, and the OFSTED inspection framework intensifies this. Secondary schools are experiencing a particular period of pressure with more schools experiencing turbulence and some challenging OFSTED inspection outcomes. This pressure often realises itself in the form of a moral dilemma, where some schools feel that the increasing presence of numbers of pupils with SEMH needs, produces a pressure to permanently exclude. Ofsted's recent refocus on the whole educational experience is welcome but pressure remains.

There is a perception that Progress 8 has narrowed the opportunities for schools to offer an alternative curriculum. There is a need to support schools and for schools to support one-another in delivering a relevant engaging curriculum for all learners.

Big Issue 4: Actions

- i) Create knowledge and understanding of what good SEMH provision looks like and share this between schools in their partnership. Use national examples of good practice and link schools in Lancashire with successful schools in other LAs where an inclusive curriculum has been judged to be good or outstanding.
- ii) Provide accurate up to date information to schools regarding exclusions within their districts and across others in Lancashire.

Big Issue 5. Differing Thresholds and Graduated response

Tolerance levels and thresholds for inclusion are different in all schools. Whilst this is acceptable, when pressure is being exerted on a finite shared resource, equity, fairness and consistency become an issue.

Where a school permanently excludes pupils, places are occupied at the PRU which then limits access for schools seeking to avoid permanent exclusions using part-time or fixed term placements.

There is a specific need for a coherent graduated response for children and young people with SEMH difficulties which is developed and understood by all schools in Lancashire. Some school leaders mentioned this but felt it was neither fully established nor developed countywide.

The Lancashire graduated response should include the requirement for schools to hold responsibility for developing a number of "in house" curriculum options. It will be necessary to develop a new range of in-school provisions using knowledge of what already works well in some areas. If all schools are supported to develop their "in-house" Alternative Provision/support offer, there will be the opportunity to share the use of provision between schools.

Big Issue 5: Actions

- i) Develop an authority wide graduated response for young people with SEMH needs that contains examples of best practice and embed this across all schools. The effective use and implementation of the approach should be part of any quality assurance indicators for the school/service.
- ii) Phase one schools to use the graduated approach as a tool across their partnership and embed the in-school practice that it exemplifies.

Big Issue 6. Sharing what good looks like

It is evident that there are examples of good practice across Lancashire but that all schools are not aware of this. It will be important to identify good practice and share with all schools what this looks like and how support and knowledge and expertise may be accessed.

Schools should include SEMH arrangements in their self-evaluation to establish a notion of what good looks like. The self-evaluation exercise should be based on aspects of the Bennett Report and the features of practice identified during this review. Elements of the SEF should include:

- a rich a varied curriculum offer
- a positive inclusive ethos which establishes an understanding that
- these children are 'all our business'
- levels of exclusion
- an appropriate, consistent and fair behaviour strategy
- an accessible SEMH CPD offer to staff
- effective leadership
- tracked pupil outcomes and destinations.

Big Issue 6: Actions

- i) Develop a self-evaluation tool for schools which will enable judgements to be reached about the strengths and gaps in provision. Establish a Focus Group that meets on two occasions to develop the self-evaluation tool.
- ii) Test the tool with Phase one pilot schools
- iii) Identify strong schools and link these to schools that would benefit from their knowledge, experience and good practice.

It will be necessary to establish a period of implementation and evaluation after completion of the actions described above. The Governance Board will then need to determine whether Phase 1 has achieved the success criteria necessary to progress to Phase 2 i.e. the roll out and expansion of the partnership programme.

8. Conclusion

- 8.1 In the light of the big issues described above, there is a wide acceptance by schools in Lancashire of the need to change and there is the perception that it is now a good time to develop new arrangements for pupils with SEMH needs. We would recommend a number of changes as part of a phased development programme. Initially these changes will provide a SEMH infrastructure that will help to progressively implement the required changes. In effect this is the establishment of a school led self-improvement system.
- 8.2 The recommended actions to address the Big Issues are contained in the previous section of this report. Lancashire needs to take decisive action to bring its spending on this area under control, make a better set of arrangements for its most vulnerable young people and utilise and benefit from peer led improvement systems.
- 8.3 This review highlights the need for Lancashire to promote a new strategy for secondary pupils with SEMH needs which:
 - articulates a sense of moral purpose and commitment to achieving the best outcomes for its most vulnerable learners
 - establishes a robust Governance system to oversee the implementation of the new arrangements
 - re-establishes a graduated approach for SEMH with agreed thresholds which are developed with and understood by all schools and partners
 - includes arrangements at key points of transition in a child or young person's life
 - defines the role of the secondary PRUs
 - provides a system of school to school support through collaborative approaches
 - enables schools to become the commissioners of alternative provision
 - develops a school improvement agenda for pupils with SEMH.
- 8.4 These recommended changes will need very careful handling. Dedicated capacity and attention will be required in order to deliver the necessary change and ensure that there is a continued commitment from head teachers to make this work.

9. Actions Summary Presentation

ESTABLISHING A PARTNERSHIP MODEL - PHASE ONE

Local Authority Actions	Expectation/Role of school/school Leaders
<ul style="list-style-type: none"> Establish a Governance Board with responsibility for the oversight of the implementation of the initiative. The Board should have senior strategic representation from schools, CAMHS and Early Help and SEND Services. Establish 3 'Phase one' SEMH Partnerships – groups of schools. Allocate resources/ powers to partnerships to develop schools role as commissioners/providers of Alternate Provision Support the partnerships in establishing regular working practices. Make services available through the partnerships. 	<ul style="list-style-type: none"> Volunteers to be active members. Whole districts or group of schools within districts to declare interest. Senior Leaders with decision making powers to be available to meet regularly. Use the resources/ powers to meet pupil need and control access negating the need to permanently exclude as far as possible. Share good practice between schools. Establish the graduated response within all partnership schools.

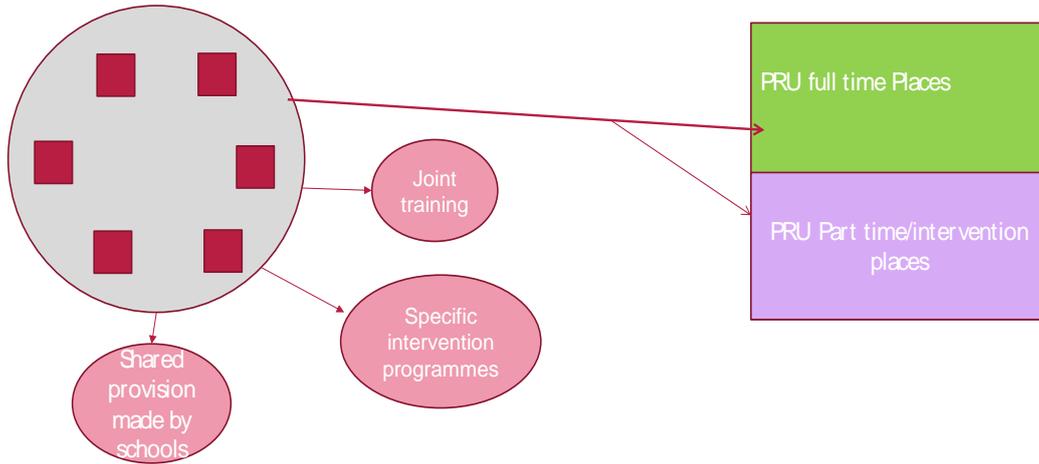
FURTHER LOCAL ACTION FOR INCLUSIVE PRACTICE

Local Authority Actions
<ul style="list-style-type: none"> Make a statement setting out a clear vision and expectation to develop inclusive practice In Lancashire. Provide training for school governors on inclusive practice and meeting SEMH needs. Review the SEMH provision sourced from independent non-maintained providers. Quickly form a detailed plan to re-allocate a significant amount (25%) of the resource spent on independent non-maintained providers to schools and SEMH partnerships in Lancashire. Regularly review use of commissioned places both within the LA and independent non maintained providers. Make sure – expensive provision is not filled by poor attenders/non attenders, seek cheaper alternatives for these pupils. Support SEMH partnerships to provide transition support to vulnerable pupils moving from primary to secondary phase.

Models of Devolution.

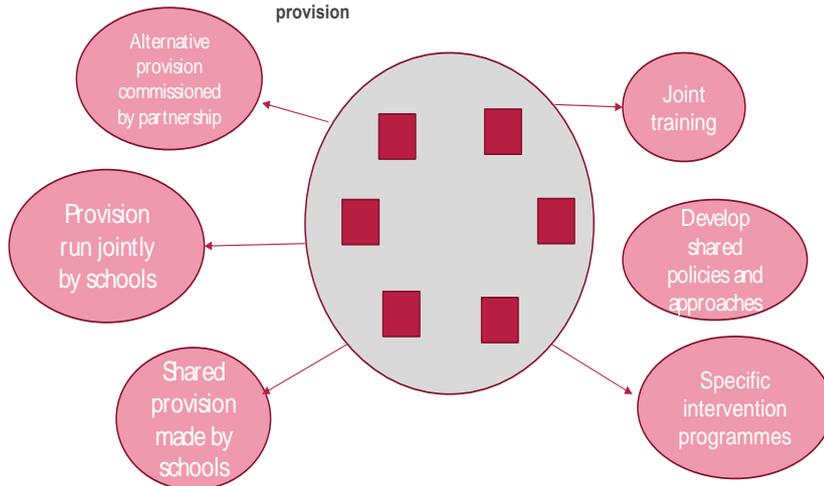
PARTNERSHIP MODEL

Partnerships of schools decide what they need then commission and manage the use of places at the PRU/AP



FULLY DEVOLVED MODEL

Partnerships of schools give directly all the resources for SEMH so they provide, commission and manage all Alternative provision



Acknowledgement

SEND4change would like to thank all schools, and colleagues in the secondary PRUs and Local Authority who have been involved in the review for their time and commitment and positive engagement in considering how arrangements for pupils with SEMH can be improved. Conversations have been honest and considered and have established that there is an appetite for change which the Council should grasp and build upon.

APPENDIX.1

Summary of formal meetings

Activity	Month
Meet LA Officer SEND	Sept 18
Meet LA Officers Ed	Oct 18
Meet LA Officers Inclusion	16 Oct 18
Meet LA Officers improvement	31Oct 18
Meet PRU Headteachers LA Education Finance	Nov 18
Meet LASSH (following full meeting)	16 Nov 18
District Heads Meeting (Haslingden School)	23 Nov 18
District Heads Meeting (John Fisher Thomas More School)	30 Nov 18
District Heads. Bradshaw C of E Leyland	Dec 18
Meet LA Officers	17 Jan 19
Meet LA Officer	21 Jan 19
District Heads (St Aiden's School)	28 Jan 19
Telephone Meeting Head teacher	30 Jan 19
LASSH Executive	6 Feb 19
Shuttleworth College	8 Feb 19
Telephone Meeting Head teacher	Feb 19
District Heads tbc	March 19
Additionally, written evidence was given from PRU Head teachers and from one other District	

APPENDIX 2

Themes of Low Excluding Schools					
Support Network	Positive Reinforcement	Mindset	Prevention / Monitoring	Policies	Collaboration
Parent engagement in meetings / regular contact with staff SLT / SENCo liaison with pupils Governors involvement in meetings with pupils/parents Form Tutors as first intervention Pastoral team available for in-house counselling "Behaviour for Learning Tutors" Peer-buddies Pupil Voice / Consultation	Praise Whole-school reward systems (determined by School Councils / Pupil Voice) Extrinsic rewards: Merits, Badges, certificates, Postcards, School tokens. Half termly rewards / annual trips for good behaviour	In-house counselling available for pupils Whole school focus on 'resilience building' Frame of mind / growth mindset training 'raising aspirations' of students from low socio-economic backgrounds Pupils involved in their own target setting (academic and behavioural) Pupils have regular 'motivational interviews' with support networks to promote self-efficacy.	Online behaviour tracking systems / Synergy / Sims Individual support plans / IEPs / PSPs / Boxall Clear, achievable, positive behaviour policies Form Tutors / Pastoral / SLT have regular meetings with pupil to monitor progress Whole-staff CPD on behaviour management and behaviour policies Registers for staff with pupil needs Identifying trends in behaviour to adjust and personalise provision	Clear, simple policies Focus on intervention procedures not consequences Regular Interventions/ meetings for pupils by school staff Internal exclusions Reintegration policies following exclusions Parent/Governor attendance at meetings discussing pupil support 'Managed Moves' / 'directions' systems with other schools	Sharing good practice with local schools Charities WPEH Police Early Action Team

Themes of High Excluding Schools				
Support Network	Staffing & Resources	Tensions	Policies	Options
<p>Parents often do not attend reintegration meetings.</p> <p>Lack of boundaries at home and unsettled home life.</p> <p>Pupils have low aspirations</p>	<p>Lack of funding</p> <p>Difficulties recruiting staff</p> <p>Staff changes and supply staffing has implications for planning and coordination of information</p> <p>'Pupil's struggle with change'</p> <p>Congested and over-subscribed schools</p> <p>Pupils respect staff who follow policies consistently</p>	<p>Pupil's needs described as 'extreme'</p> <p>Unaddressed difficulties in Primary School</p> <p>'Extreme needs cannot be met in school'</p> <p>Problems maintaining accountability for pupil progress and responsibility of pupils sent to in school isolation.</p> <p>During internal exclusions, pupils were not sent with work and were supervised by teaching assistants or staff during their classroom release.</p>	<p>Behaviour policies include very specific behaviours.</p> <p>Policies are not consistently applied.</p> <p>Problematic language of policies that is complicated and likely to be unfamiliar to many pupils.</p> <p>Many levels within policies, with many chances, which makes it difficult to follow (especially supply staff)</p> <p>Pupils trained in playing the system</p> <p>SLT involvement at later stage within policies</p>	<p>Lack of alternative provision</p> <p>Long wait time for EHCP</p>