Wiltshire Council

AGENDA SUPPLEMENT (1)

Meeting: **Children's Select Committee**

Place: **Council Chamber - County Hall, Bythesea Road, Trowbridge, BA14 8JN**

Date: **Wednesday 15 January 2025**

Time: **10.30 am**

The Agenda for the above meeting was published on 07 January 2025. Additional documents are now available and are attached to this Agenda Supplement.

Please direct any enquiries on this Agenda to Max Hirst of Democratic Services, County Hall, Bythesea Road, Trowbridge, direct line 01225718215 or email max.hirst@wiltshire.gov.uk

Press enquiries to Communications on direct lines (01225)713114/713115.

This Agenda and all the documents referred to within it are available on the Council's website at www.wiltshire.gov.uk

10   **Rapid Scrutiny Report - Educational Performance Outcomes** *(Pages 3 - 10)*

   11a   **Safety Valve update** *(Pages 11 - 44)*

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Wiltshire Council

Children's Select Committee

15 January 2025

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Education Performance Outcomes Rapid Scrutiny

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Purpose of the Report

1. To present to the Children's Select Committee ("the committee") the findings and recommendations from the rapid scrutiny exercise undertaken on Education Performance Outcome trend data.

Membership

2. Cllr Jon Hubbard (lead), Cllr Caroline Corbin and Cllr Martin Smith.

Terms of Reference

3. The aim of the rapid scrutiny was:

   To understand in more depth the performance figures for primary school outcomes, as well as identifying trends and outliers, to inform how the committee will consider education performance outcomes going forward.

Background

4. At its meeting on 12 March 2024, the committee considered an Education Performance Outcomes report for ages 5 to 19 in the academic year 2022-2023. At the committee, members stated that they were keen to consider how longer-term trend data could be presented in future reports, something that was agreed by officers.

5. The report identified that, although performance was relatively strong in Early Years and Key Stage 4 there were challenges in Key Stage 2, particularly in maths. The committee, therefore, requested further information about Year 6 performance, to help them to make their recommendations about how the information should be reported.

6. When organising the rapid scrutiny, education officers suggested that it may be useful to extend the review to all performance data in primary schools.

Meeting

7. There was a single meeting held on Wednesday 11 December 2024.

8. The rapid scrutiny members were grateful to the following officers for their attendance and the information they provided at the meeting:

   o Kathryn Davies - Director Education and Skills
   o Louise Lewis – Head of School Effectiveness
   o Charlotte Gilbert – Assessment Adviser in School Effectiveness
   o Kate Wilkins – School Effectiveness with responsibility for Disadvantaged Learners
   o Lesley Lowe – School Improvement Lead
   o John Spring – Head of Targeted Education and Virtual School Headteacher
   o Paul Holdsworth – EEIA, Virtual Schools SEC – Targeted Education

9. Members of the rapid scrutiny exercise, thereafter, referred to as "members", received a comprehensive presentation to provide them with a clearer picture of performance in Wiltshire's primary schools.

Findings

How Educational Outcomes are Measured

10. Members were informed that pupils undergo several statutory rounds of testing in core subjects through their primary school education. In preparation for the rapid scrutiny exercise, members were provided with background reading about the different types of assessment explaining that:

   o Within the first **six weeks** of entering school children undergo a Reception Baseline Assessment recorded by their teachers.
   o At the end of **Reception**, teachers then assess pupils' level of development in seven different areas to build an Early Years Foundation Stage Profile.
   o In **Year 1** pupils' understanding of phonics and reading is assessed. Pupils that do not meet the expected threshold in phonics retake the test in Year 2.
   o In **Year 4**, pupils take an online Multiplication Tables Check
   o At the end of **Key Stage 2**, pupils take SATs in grammar, punctuation and spelling (GPS), reading and maths, as well as being teacher assessed for writing and science.

How to Interpret the Results

11. Members were made aware of the incomplete nature of the data available to the Local Authority. For example, the results of the Reception Baseline Assessment and Year 4 Multiplication Tables Check are not automatically shared with Wiltshire Council. The Covid-19 pandemic also had a significant impact on the data between 2020 and 2022.

12. Until the 2023-24 academic year, it was a statutory requirement to take SATs at the end of Key Stage 1. It is now optional whether schools want their pupils to take these tests. This is a significant change, as progress scores for pupils at Key Stage 2 are calculated using Key Stage 1 SATs but this will not be possible in most cases after the current Year 4 and Year 5 leave primary education. Pupils will eventually be measured from Early Years Foundation Stage starting points.

13. A further challenge in interpreting the data is that each of the statutory tests adopt different marking and recording systems to ensure that they are age appropriate.

Headlines

14. Members were presented with headline trend data that was compared to national, regional and statistical neighbours (where available). In line with the report received by the committee on 12 March 2024, they saw that overall performance in Wiltshire was not too dissimilar from national average. There was slightly stronger performance in the Early Years and later in Key Stage 4, but with a decline in performance at Key Stage 2 where there was a performance dip, particularly in maths.

15. There had been a pleasing improvement in phonics in Wiltshire over recent years and performance in writing and reading remained steady. Areas of focus included grammar, punctuation and spelling, where there was a larger gap with the national average than in reading and writing at Key Stage 2 SATs.

16. Data was gathered from all schools, so it would be possible to compare performance in specific geographical areas, or in schools with particularly high numbers of vulnerable pupils, to the county average. For example, there were relatively high concentrations of Disadvantaged Learners in Chippenham, Trowbridge and Salisbury. As Wiltshire was a rural county, it was emphasised that statistics from certain geographical areas could be heavily impacted by a few pupils in smaller schools.

17. It was clarified that Disadvantaged Learners, the largest group of vulnerable pupils, were in receipt of Pupil Premium or Pupil Premium 6 (those pupils who are in receipt of free school meals or have been within the last six

years). As with other pupils, there had been a pleasing improvement in phonics. The gap between the percentage of Disadvantaged Learners and non-Disadvantaged Learners achieving a good level of development at Early Years Foundation Stage had also reduced, so progress was being made in this area. However, the gap in performance in Key Stage 2 for all subjects with non-Disadvantaged Learners had increased between 2021/22 and 2023/24 and remained a key area of focus.

18. Children at the Special Educational Needs (SEN) Support Level are those with additional needs that do not require an Education Health and Care Plan (EHCP). Children in Wiltshire at the SEN Support Level were performing less well than the national average for children at the SEN Support Level. However, SEN pupils with an EHCP in Wiltshire were performing at a similar level to their counterparts, with an EHCP, nationally.

19. Children Looked After in Wiltshire had better outcomes, and a lower rate of absenteeism, than the regional and national averages. No Child Looked After had been permanently excluded from a Wiltshire School within the last five years.

20. It was explained that Children in Need were those requiring extra support or services to help them to maintain 'a reasonable standard of health or development'. They had a social worker and either a Child Protection Plan or a Child in Need Plan. The combined scores for these pupils in reading, writing and maths at Key Stage 2 had had shown significant progress. It was noted that here were challenges in tracking the group as they were a relatively fluid cohort; data is taken from the census.

21. There was stronger performance in academies than maintained schools for pupils at Early Years Foundation Stage. However, by Key Stage 2, although academies were performing better in writing, they were performing slightly less well than maintained schools in reading and maths.

22. In response to queries from members about the impact of ending the mandatory requirement to complete Key Stage 1 SATs tests on monitoring pupils' progress, it was confirmed that a new measure would be introduced by the Department for Education stretching from entry to the completion of primary school.

23. The persistent, total and unauthorised absence rates in Wiltshire were improving and better than the national average. There had been an increase in the number of severe absences, but this was in line with national trends. Disadvantaged Learner performance was closely linked to overall absence data and significant resources had been focussed upon this area.

24. Reassurances were provided to members that pupils with a high level of unauthorised absence were offered support, and an attendance pathway was put in place to help identify the reasons why they were not attending. Data recording had improved to allow absences for pupils receiving reduced education provision to be specifically tracked, rather than being recorded in

the overall authorised absences data.

Conclusions

25. It should be noted that the focus of the rapid scrutiny exercise was not to conduct an in-depth statistical analysis of the Education Performance Outcomes, but to focus on selecting the information that was most relevant to be presented at committee level and the best format in which it could be presented.

26. Members emphasised that the starting principle for the report was that it should be aimed at a general audience so that trend data was displayed in a way that was accessible and clearly identified areas of strength and concern. It was important to have brief background information about the different tests were assessed, as well as clear definitions of the different categories of young people.

27. Consistency of presentation was identified as very important. It was highlighted that laying out tables in as similar a way as possible, to put gaps and percentages in context, would be beneficial. Furthermore, the use of red, amber, green (RAG) ratings and up and down arrows were seen as useful visual aids that could add clarity. Graphs were also viewed as a useful accompaniment to, but not replacement for, raw data.

28. The limitations of the data were recognised, including factors such as the turnover and categorisation of pupils, recent pandemic, different reporting requirements for schools and the end to the mandatory Key Stage 1 SATs. In order to monitor how pupils were comparing to national and regional trends, it was felt that it would be useful, if possible, to track the progress of some anonymised cohorts of slightly above and below average performing groups through their school years so that a consistent group were being monitored.

29. Members noted that Ofsted's framework saw the performance of Disadvantaged Learners as a barometer of success for whole subject areas. Therefore, they were particularly keen to see the relative performance of different groups of young people over time. Breaking down the figures in this way would not only allow the committee to see gaps in outcomes for different cohorts but to better understand how they impacted average performance. Including overall numbers, as well as percentages, was felt to be important contextual information.

30. Members were keen to learn how many pupils fell into multiple categories to add additional context to the data and to receive assurances that there was enough support and understanding of individual needs. If possible, the felt that it would be handy to have a Venn diagram to show the overlap between the groups.

31. In addition, they were keen to know how summer born children, with delayed entry to school, were assessed in the Reception Baseline Assessment and how children being taught in classes outside of their age group were presented in the figures.

32. A comparison between trends in performance of maintained primary schools and academies, in Key Stage 2 SATs, was seen as important inclusion given the slight variation in outcomes between different subjects.

33. It was recognised that including the relative performance of schools categorised by Ofsted gradings would be challenging in future given the plans to end single word gradings.

34. Members were keen to see the correlation between absences and achievements, particularly for vulnerable cohorts. It was also noted that school absence data comes to the committee through regular school improvement updates.

Recommendations

The Children's Select Committee are asked to approve the following recommendations to develop the Education Performance Report (with the aim of enhancing understanding and scrutiny of educational performance data):

Recommendation 1 – The report displays trend data in an accessible way that does not need specialist knowledge to understand.

Recommendation 2 – The report illustrates clearly how the results from disadvantaged groups relate to average performance and how many pupils fall within multiple groups.

Recommendation 3 – The structure of the report, if possible, is amended to include the following:

- o **an overall RAG rating from officers on the first page for the different types of assessment criteria, Key Stages and vulnerable groups, so it is easy to identify the areas that need careful monitoring.**
- o **sections covering the different types of assessment within each Key Stage. Each section would include a summary page (scorecard) including the key points to bring to the Committee's attention from the data.**
- o **brief background information about of how assessments are carried out, to be included on the summary page.**
- o **graphs showing the difference between academy and maintained schools for SATs.**
- o **to show progress of anonymised cohorts of slightly above and below average performance though their school years is tracked so that consistent groups of children are being monitored.**
- o **to clarify whether references to pupils receiving Pupil Premium includes Pupil Premium Plus.**

- information about how delayed entry (summer born) students, and those being held back a year, are reflected in the data.
- figures for the number of students receiving reduced education provision should be included.

Recommendation 4 – The presentation of the report is made more accessible and includes the following:

- clear definitions for different categories of pupils and acronyms, (Disadvantaged Learners, Children in Need, Children Looked After, Special Educational Needs, English as Additional Language, Previously Children Looked After etc.,).
- commonality in formatting of tables in each section as possible (e.g., the Wiltshire figures in the left-hand column of all tables and the regional figure in the central column).
- shaded columns to make them easier to read.
- green (good) and red (bad) arrows alongside tables to make it clear whether deviations from the national and regional averages are positive.
- the inclusion of graphs, in addition to the raw data, to show trends.
- a glossary of terms at the end of the report (this could also be attached to all future reports).

Cllr Jon Hubbard (Lead) – Education Performance Outcomes Rapid Scrutiny

Report Dated: 3 January 2024

Report author: Matt Hitch, Senior Scrutiny Officer

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Wiltshire Council

Children's Select Committee

15th January 2025

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Safety Valve Update

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Background

1) The Dedicated Schools Grant (DSG) is funding which local authorities in England receive to support schools. The DSG is split into four blocks which support different parts of the schools system.

2) One of these blocks is the High Needs Block which is used to support children and young people with Special Educational Needs and Disabilities (SEND). Since 2018/19 the High Needs Block has been under increasing pressure. This growth in expenditure has been seen in every council in England, and Wiltshire is no exception.

3) In Wiltshire from 2018/19 to 2022/23, this equated to a 51% growth in the number of children supported by an EHCP, and a 46% growth in the amount of money being spent from the High Needs Block. Over the same period, the money received into the High Needs Block from government only grew by 36%.

4) While High Needs Block income has not kept pace with the growth in demand, there are also changes that councils can make to respond to the changing strategic context.

5) The government introduced a statutory override which allows councils to hold their DSG deficit as a negative reserve on their balance sheet, separate from the rest of the council's finances. This statutory override, however, is due to expire 31st March 2026 and at that point the cumulative unmitigated deficit could be £117.0m while the current forecast total general fund and earmarked reserves are £90m.

6) Safety Valve is a DfE programme to support councils that have a financial challenge with their High Needs Block. The invitation to join Safety Valve was received in August 2023.

7) The High Needs Block Sustainability Plan for Wiltshire has been developed with stakeholders to identify improvements in our SEND system that will create better support for children and young people and their families, while addressing the financial challenges.

8) That plan was submitted to DfE in January with endorsement from Children's Select Committee, Wiltshire Schools Forum, and a cross-sector board including membership from Wiltshire Parent Carers Council (WPCC) and the Integrated Care Board (ICB). This was then turned into an agreement which was signed in March 2024.

9) The agreement commits the DfE to contribute £67m of additional DSG towards this cumulative debt, while any residual deficit will need to be found from other funding sources. If the council successfully meets the deal criteria faster than expected, then

this figure could reduce however, if the council fails to meet the deal criteria then this figure will go up, and could lead to the DfE withholding future Safety Valve funding.

10) The plan that the council submitted sets out how the savings can be met through a series of "invest to save" projects that will improve support for children and young people with SEND, and their families.

11) The plan has been combined with other strategic documents in SEND, and the new SEND and AP Strategy, and an Implementation Plan is being developed. This has 6 priority programme areas which are closely aligned to the new SEND and AP Strategy:

   a) Voice of the child and their family
   b) Improving support, skills and practice
   c) Right support at the right time
   d) Preparation for adulthood
   e) Financial assurance in our SEND system
   f) Improving communication, processes and culture

12) The Implementation Plan will be underpinned by an Outcomes Framework that sets out the ambition of the SEND Local Area Partnership and how they will measure the impact of the plan.

13) In November, it was reported to Children's Select that, based on the Q1 budget monitoring, the plan was off-track and showing an overspend of £38m against a planned overspend of £28m.

14) Officers met with the Department for Education and Wiltshire Council's Safety valve advisors to discuss the plan being forecast as off-track. While the advisors are disappointed in the lack of progress, they are not surprised. Most councils, even those which are eventually successful, go off-track in year one.

15) However, this does not mean that the council can afford to assume this will happen and so a re-baselining of the plan has been undertaken and officers have worked to understand whether the mitigations in the plan are sufficient to balance the High Needs Block.

January update

16) Overall, the Safety Valve programme has been RAG rated Amber/Red. This is because, while the project activity is mostly on track, the impact has not been felt yet. The system is now 650 EHCPs ahead of the forecast, and this is showing as a £43.2m overspend against a £28m budgeted overspend.

17) This is described in further detail in the November submission to the DfE (Appendices 2 and 3), which illustrate these concerns and articulate the changes that are proposed to bring the high needs block back into balance.

18) To develop this revised plan, officers undertook a re-baselining exercise to understand the sustainability challenge and reviewed the current plan to identify the gaps. Service leads from across Education and Skills and Families and Children's directorates contributed to see what could be accelerated or re-scoped within the plan to bring the impact forward. New interventions were also developed, with a clear emphasis on measurable and deliverable impacts.

19) There is greater detail in the appendices about why the original plan is off-track and the data insights that have been gathered since the original plan was submitted. In summary, firstly the predictions around how quickly impact would be felt were optimistic. Secondly, the original forecast was based on a 5-year average, which included years where demand was artificially suppressed by COVID-19 and the assumptions about what happens to that demand were also optimistic.

20) There has also been an impact because the council has made significant progress with clearing the EHCNA backlog, ensuring that where children and young people have a level of need which would warrant an EHCP, this is available to them. The result of this is that the backlog is now at its lowest level since 2020, but this has brought more plans forward.

21) As this work was completed, it became clear that, without risking the quality of support that is available to children and young people with SEND, getting to balance in five years would not be possible.

22) Given the commitment that the council rightly shows to maintaining that quality, as highlighted in the recent Ofsted/CQC inspection, officers worked up plans that would reflect the values-based approach which underpins the original SEND Sustainability Plan.

23) To achieve this, an evidence-led approach has been taken to understanding what could be achieved in the short term to urgently address the growth in the overspend.

24) Given that Wiltshire already has more EHCPs per head of population than many of its statistical neighbours, it is not unreasonable to have an ambition that is based on achieving similar data milestones to statistical neighbours for metrics like EHCNA requests, robust decision making, and ceased plans.

25) Eight short-term interventions have been developed to move Wiltshire towards that target system by April 2026. The language around these interventions has begun to evolve as they are developed but, detailed in Appendix 3, these are:

    1. Addressing poor practice in schools
    2. Faster support before the statutory process
    3. Early Years Early Support Plan
    4. Additional post-16 ceasing
    5. Celebrating success through pre-16 ceasing
    6. Improved decision-making
    7. Mid-phase step down out of Independent Sector Placements
    8. Growing capacity through Assistant Education Officers

Without this April 2026 milestone being met, balancing the SEND budget in Wiltshire becomes impossible.

26) While targets and measurable outcomes are key, all eight interventions place the needs of children and young people at the centre and are grounded in an invest-to-save approach.

27) These interventions have been mapped onto the revised forecast and officers believe that the earliest time that the High Needs Block could be balanced is March 2031, two years later than originally planned. This would make the SEND sustainability programme a seven-year process, rather than the five years originally set out in the Safety Valve Plan.

28) This would leave a £123.4m residual deficit for Wiltshire Council to manage, up from £70.3m in the original plan. This will be a challenge, especially if local government budgets continue to be pressured, as they have been in recent years.

29) The resulting changes, and revised plan, were submitted to the DfE in early December, subject to Cabinet approval. The revised plan is going to Cabinet next week (21st January 2025), and while there was not sufficient time to fully consult Children's Select Committee before submission to the DfE, there is still an opportunity for the committee to express views which can be conveyed to Cabinet and will be considered during delivery.

30) Extending the length of the Safety Valve agreement, and adjusting the deficit limits in it, are not steps that the council can take unilaterally and if Cabinet agrees then there will need to be further discussion with the DfE. The council should not expect the DfE to increase the contribution they are making as part of the Safety Valve agreement.

Appendices:
1. SV Dashboard – Jan 25
2. DfE Monitoring Update – Nov 24
3. Changes to the plan – submitted to the DfE

Portfolio Summary

Overall RAG

AMBER / RED

Overall, SEND Transformation is Amber/Red - At Risk. This is because, despite significant progress being made on the project activity we are not yet seeing these efforts reflected in the data. Clearly the assumptions about how quickly the impact of our efforts would be felt were optimistic and this is now being factored into future plans.

The number of EHCPs in the Wiltshire system is 650 plans higher than forecast for this point in the plan and now that this is being seen in the financial figures, this is driving a £15m overspend above the expected overspend for this financial year.

There are some positive signs, demand for EHCNA requests appears to have plateaued - but this needs to be monitored to ensure it is not supressed demand which is going to reoccur at a later date. However, while demand is plateauing, this gives us a stable state to forecast the new plan from.

Number of EHCPs

6357 !

Forecast to date: 5707 (+650)

HNB Overspend 2024/25 (£m)

43.20 !

Goal for this financial year: 28.21 (+14.99)

Finance Data reflects: Q2 Forecast

Children with EHCPs in INMSS

5.75% ✓

Forecast: 6.92% (-1.17%)

SEND Data last refreshed: 07/01/2025

Workstream Status by Programme

- Blue - Completed
- Green - On Track
- Amber / Green - Off ...
- Amber / Red - At Risk
- Red - Compromised
- Grey - Not Started
- Black - Cancelled

1 - Voice of ...
2 - Improvin...
3 - Right su...
4 - Preparat...
5 - Financia...
6 - Improvin...

	Active Transformation Programmes:	Active Transformation Projects:	Total Transformation Workstreams:	Active Transformation Workstreams:
	5	15	59	39
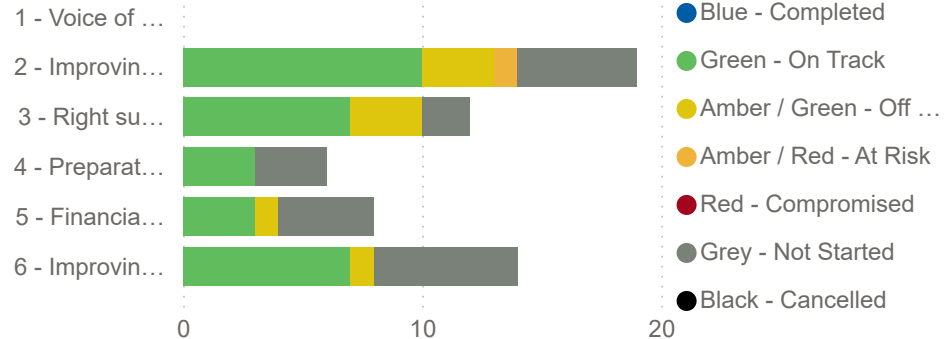
Key Programme Risks (15+)

Risk	Impact	Risk Owner	Impact (1-5)	Likelihood (1-5)	Risk Score ▼	Action required
If growth is stronger than forecast, we will not meet our trajectory.	The Council will face further financial difficulty and the DfE may withold payments under the Safety Valve agreement	Kathryn Davis	5	4	20	This risk has become an issue, and so we are reforecasting the plan. This will give us a new trajectory which will then need to be monitored.
There is a risk that the capital programme fails to generate a reduction in INMSS placements	These expensive placements will continue to increase, and drive the deficit.	Kathryn Davis	4	4	16	We are working to deliver the plan and ensure our revised plan has realistic mitigations in it.
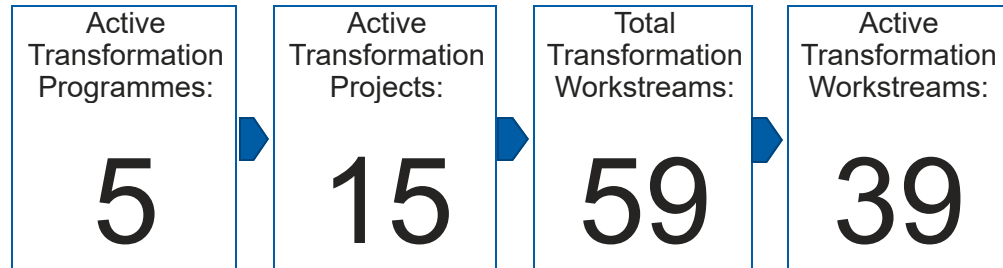
1 - Voice of the child and their family

Further work to be done as part of developing the SEND Strategy Implementation Plan to understand what the workstreams and data are for this area.

## 2 - Improving support, skills and practice

Key Contributing Workstreams

Workstream	RAG
Improved early support offer, building on the Family Hub pilot	Green - On Track
Improved pathway navigation to ensure early support offer is fully utilised by early years	Green - On Track
Multi-agency approach to supporting schools before an EHCP is issued	Amber / Green - Off Track
New Team of Inclusion Advisors working in schools	Green - On Track

Status of Milestones Due

20	(blue)
7	(yellow)
7	(green)
7	(grey)

EHCP Caseload

● EHCP Numbers (Actual) ● EHCP Numbers (SV Forecast)
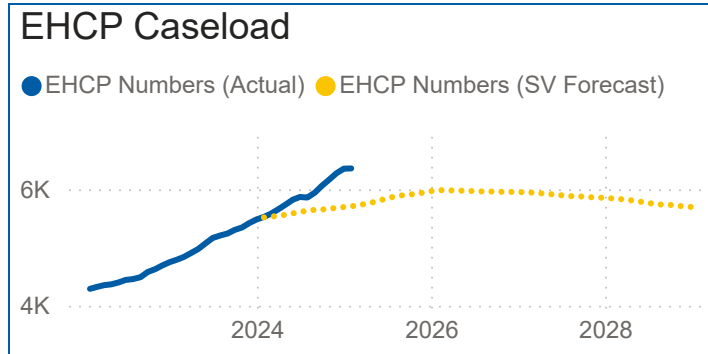
Date	# funded EHCPs	EHCP v last year	% 0-25 with EHCP	EHCP % v Stat Neigh
Dec-24	6353	872	3.82%	0.63%
Nov-24	6274	856	3.77%	0.58%
Oct-24	6166	823	3.70%	0.51%
Sep-24	6059	758	3.64%	0.45%

SEND Data last refreshed: 07/01/2025

EHCNA Requests (12-month rolling average)

● EHCNA Requests (Actual) ● EHCNA Requests (SV Forecast)

% Requests from Parent Carers in the last month

13.11% ✓

Lst Yr: 0, 2

% new plans in Early Years (12-month rolling)

27.26%
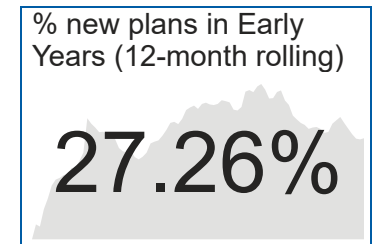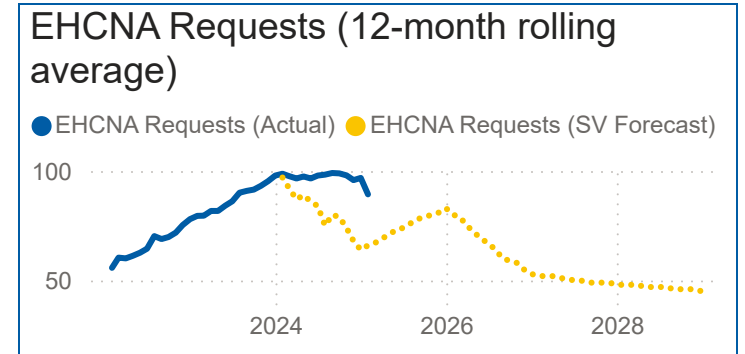
3 - Right support at the right time

Key Contributing Workstreams

Workstream	RAG
Additional Secondary Resource Bases	Green - On Track
Further improvements to our Resource Base model	Green - On Track
Proactive approach to bringing children back into a mainstream setting	Green - On Track

Status of Milestones Due

7

3

Children with an EHCP in Independent Special School (12-month rolling average)

● INMSS (actual)   ● INMSS (forecast)
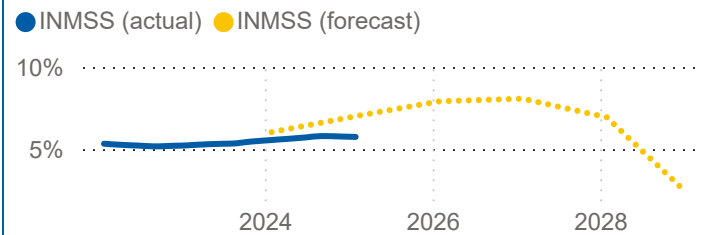
Date ▲	% placed in INMSS	vs 2023 Stat Neighbour	# placed in INMSS	vs last year
Dec-24	5.64%	-0.08%	358	41
Nov-24	5.72%	0.00%	359	40
Oct-24	5.82%	0.10%	359	41
Sep-24	5.85%	0.13%	354	44

New Special School Places (Running Total)

● New Places (Forecast)   ● New Places (SV Pl...   ● Places filled (Ac...
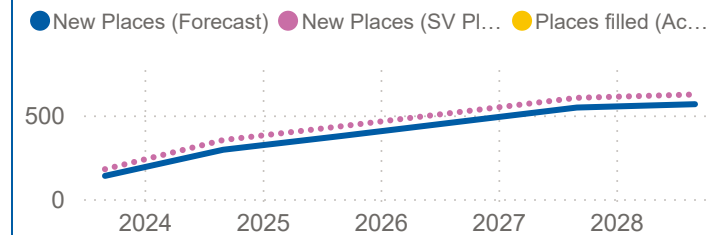
Special School Places Filled	Special School Places Shortfall	Estimated Cost of Shortfall
(...	58	£2.24M

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4 - Preparation for adulthood

Key Contributing Workstreams

Workstream	RAG
Clear set of attractive employment options for young people with SEND, developed with employers	Green - On Track
Increase PfA capacity to allow more informed and proactive conversations about ceasing plans.	Green - On Track
To increase the options, support and information in order to better prepare young people with SEND for adulthood.	Green - On Track

Status of Milestones Due

10

EHCPs Ceased (12-month rolling average)

● EHCPs Ceased (Actual)   ● EHCPs Ceased (Forecast)

SEND Data last refreshed: 07/01/2025
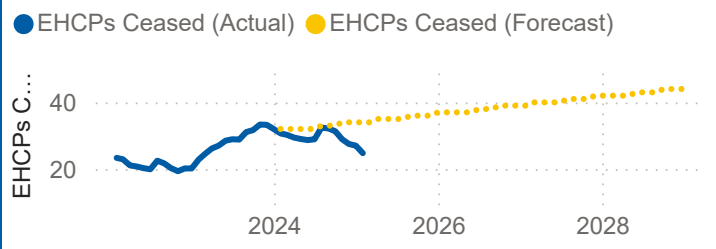
5 - Financial assurance in our SEND system

Key Contributing Workstreams

Workstream	RAG
Further development of our decision-making panels and review related processes	Green - On Track
Review of school SEND funding including special schools and top ups	Green - On Track

Status of Milestones Due

10

In year net position HNB (-£,000,000)

● Sum of DSG Net Ov… ● Sum of Mitigat… ● Sum of Un…

Average Cost per EHCP

● Average Cost (Actual) ● Average Cost (SV Forecast)
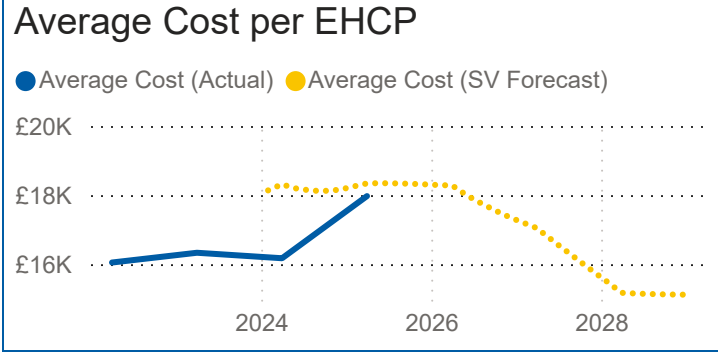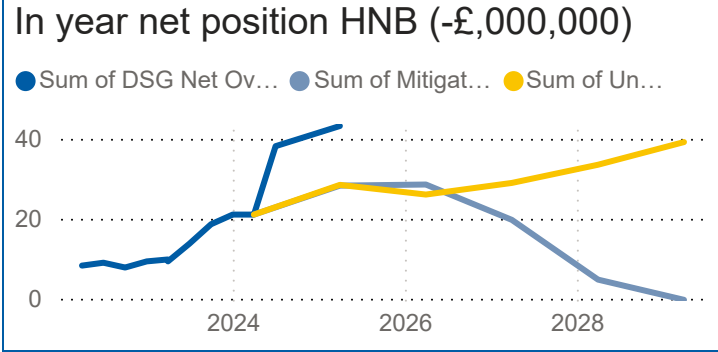

6 - Improving communication, process…

Key Contributing Workstreams

Workstream	RAG
Clear the EHCNA backlog and create a Tribunals Team to effectively manage the process	Green - On Track
Communications strategy for communicating with parent carers	Green - On Track
Early Help Hub and Advice	Green - On Track
Further integrated processes and paperwork in our system to drive efficiencies	Green - On Track

Status of Milestones Due

12

5

20 Week decisions made on time (%)

● Actual for the previous month ● 12 month rolling average

EHC plans issued on time

● Actual for the previous month ● 12 month rolling average

SEND Data last refreshed: 07/01/2025

Finance Data reflects: Q2 Forecast
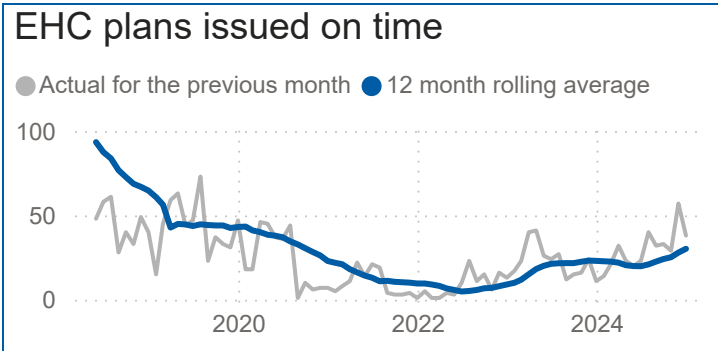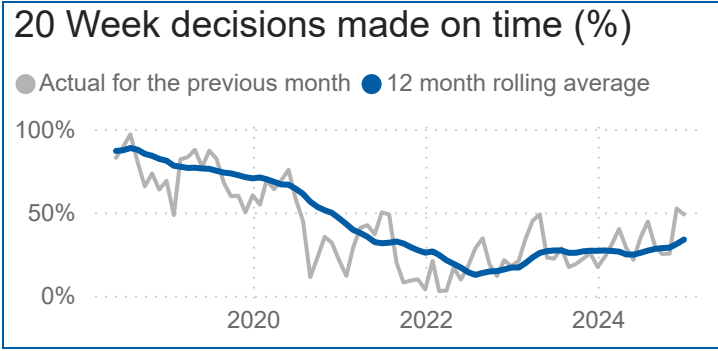
SAFETY VALVE PROGRAMME OVERVIEW

LA Name	Date Report Submitted	Signed off by S151 Officer & Director of Children's Services	Name & Email Address of Key Personnel	
Wiltshire	11th December 2024		CEO:	Lucy Townsend Lucy.Townsend@wiltshire.gov.uk
			S151 Officer:	Lizzie Watkin Lizzie.Watkin@wiltshire.gov.uk
Do you need additional support from either of our specialist SEND advisers (early years / inclusion) to support the effective delivery of your Safety Valve plan? If yes, please specify which area (early years / inclusion) you would like extra support in, giving a brief overview of how this support would be beneficial.			DCS:	Darryl Freeman Darryl.Freeman@wiltshire.gov.uk
The initial meeting held with both advisors was very helpful and so the intention is to continue working with them. Of particular interest, and subject to further exploration, was: advice shared on the use of attitudinal measures to assess the impact of SEND transformation on mainstream inclusion; enhanced provision opportunities in EYFS Reception classes; and the use of special schools as part of triads within a SEND review framework for mainstream schools.			Other key contacts for Safety Valve:	Kathryn Davis – Director for Education and Skills Kathryn.Davis@wiltshire.gov.uk Florah Shiringo – Interim Director for Children and Families Florah.Shiringo@wiltshire.gov.uk Ben Stevens – Inclusion, SEND and AP Transformation Lead Ben.Stevens@wiltshire.gov.uk Liz Williams – High Needs Block Finance Lead Liz.Williams@wiltshire.gov.uk Lisa Fryer – Head of SEND and inclusion Lisa.Fryer@wiltshire.gov.uk

Is your LA's Safety Valve plan on track?	Yes/No	Commentary
To achieve the Safety Valve agreement's projected deficit in the current year?	No	As was reported in the August update, based on the Q1 forecast, the Wiltshire Safety Vave agreement is not on track to meet the projected deficit in year. This remains the case based on Q2 monitoring, and there has been further adverse movement of £5.05m. This is due to continued demand being higher than forecast, and this generating more independent non-maintained special school placements.
To achieve a £0 DSG deficit by the end of the Safety Valve agreement?	No	Further analysis has been undertaken to model forward the impact of the plan being off-track. It is no longer thought possible to reach a £0 deficit by the end of the 5 year Safety Valve agreement. This is a reflection that, despite positive steps being taken on inclusion, finance and post-16 workstreams, there has not been any appreciable impact seen in Year 1 so far, and consequently there has been additional cost been added to the system. There is a plan to reach balance 7 years after the commencement of the Safety Valve agreement (April 2031) and a discussion with the DfE about amending the agreement in line with this would be welcomed. Given how this impacts the residual deficit, which the council is responsible for, the authority has thoroughly explored options to get to a balanced position earlier.

SAFETY VALVE PROGRAMME OVERVIEW

		However, it has not been possible to identify viable options without compromising the support that is offered to, and required by, Children and Young People with SEND in Wiltshire.

	Yes/No	Commentary
Is your LA's Safety Valve capital project on track?	Yes	Despite a number of significant challenges, including an extended delay in determining the outcome of our application, the capital project is back on track and should deliver the expected placements on schedule.

Programme Headlines

This quarter, the biggest drivers of positive change have been (up to 3):

1. The continued relationships with Wiltshire Parent Carer Council (WPCC) and schools have enabled mature conversations and understanding across the system about the scale of SEND transformation required.
2. As the plan has been reworked, there has been system-wide willingness to engage with the process, despite the complexity and scale of the change required as well as competing priorities during the month of October when we were engaged in the Osfted/CQC Local Area SEND inspection.
3. There has been successful recruitment into teams which will deliver support on the ground in schools. The staff recruited are credible specialists in their field, which is vital to their success. This includes, for example, recruitment of secondary behaviour support advisory teachers and SEMH inclusion mentors.

This quarter, the biggest barrier(s) to successful implementation of the Safety Valve plan have been (up to 3):

1. Capacity from officers across the partnership was lower than usual, due to the Ofsted/CQC Local Area SEND inspection, which kept key stakeholders busy for around a month. Leaders were very willing to give Safety Valve their full attention once the inspection had passed.

This quarter, the best examples of stakeholder engagement around the Safety Valve plan have been (up to 3):

1. The authority has continued to model co-design and engagement principles while delivering the plan and developing the new mitigations. There have been multiple engagement events with parent carers and schools to ensure stakeholders remain engaged, involved and have their views heard. For example, 3 face-to-face parent carer events were held in September across the county and webinars have been held monthly providing live Q&A opportunities. These have been led by the Director of Education and Skills and the Inclusion, SEND and AP Transformation Lead.
2. The first of the Stakeholder Reference Panels has taken place, bringing together schools, parent carers and the voice of children and young people to discuss and influence our project proposals.
3. The revised proposals and descriptors for EHCP top-up funding in Wiltshire have been developed through a series of small working groups with key stakeholders from the Statutory SEND team and the community care provider, HCRG Care Group. Consultation events have been delivered for schools and parent/carers as 'live' events to enable meaningful dialogue and discussion beyond the standard consultation response medium.

Alongside your Safety Valve financial and narrative monitoring reports, please share with us the latest strategic data dashboard utilised by your governance oversight board for Safety Valve.

SAFETY VALVE PROGRAMME OVERVIEW

NB This should not be something created for the DfE Safety Valve monitoring process; if you do not have a strategic data dashboard, just let us know.

SAFETY VALVE PROGRAMME DETAILED UPDATE

Agreement Condition	Assurance Level	Progress Update from this Quarter *Please include/refer to relevant data and evidence to support your rating and explain the scale of any impacts*
Condition 1: The authority undertakes to reach a positive in-year balance on its Dedicated Schools Grant (DSG) account by the end of 2028-29 and in each subsequent year.	Update 1 (May) **Green** Update 2 (August) **Amber** Update 3 (November) **Red**	The current financial forecast is detailed on the attached finance template. The council is no longer predicting a positive in-year balance by the end of 2028/29. The latest forecast is that a positive in-year balance will be possible by the end of 2030/31 and in subsequent years.
Condition 2: The authority undertakes to control and reduce the cumulative deficit, not exceeding £84.5m in financial year 2024/25.	Update 1 (May) **Green** Update 2 (August) **Red** Update 3 (November) **Red**	

High Needs Block financial forecast
2023/24 - 2030/31 (£,000)

The forecast above includes all the mitigations that have been developed, including new targets that the authority has given itself to stabilise EHCP numbers by April 2026, it has included the Local Authority contribution, and has assumed the Safety Valve payments continue.

Income for 2025/26 has been assumed to be £80.301m. This is in line with the provisional allocation announced on 28 November and represents an increase of 7.9% compared with 2024/25. This allocation will be updated following the final funding settlement in December and again in March 2025.

In future years High Needs Block income is assumed to increase by 3% per annum in line with DfE guidance. It should be noted that if all other assumptions remain the same, a 5% increase per annum in the HNB would enable in year balance to be achieved 1 year earlier.

The assumption of a 1% schools block transfer has been removed for 2025/26 and replaced with a proposed 0.5% transfer. This reflects the increased high needs block allocation for 2025/26. An assumption of 1% schools block transfer remains for future years.

Inflation on unit costs has been assumed at 2.2% per annum

This forecast does require INMSS spend to reduce to below £4m by the end of the plan which is very ambitious. We have adjusted the forecast in line with known slippage in these projects, but reaching balance in year 7 will require all the existing capital projects to be delivered on time. Additionally, there are a further 25 special school places planned

SAFETY VALVE PROGRAMME DETAILED UPDATE		
Agreement Condition	Assurance Level	Progress Update from this Quarter *Please include/refer to relevant data and evidence to support your rating and explain the scale of any impacts*
		for September 2025, 50 from September 2028, and more resource base places beyond what was previously planned. The forecast also retains an assumption that the authority can reduce EHCP rates to be in line with Good or Outstanding councils. This means EHCP numbers as at 31 March 2031 are assumed to be 5,938 compared with an unmitigated forecast of 7,996. This would leave a £122.5m residual deficit for Wiltshire Council to manage, up from £70.3m in the original plan. This will be a challenge, especially if local government budgets continue to be pressured, as they have been in recent years. Therefore, the council will be regularly reviewing what steps it can take to accelerate the impact of the plan and meet key milestones more quickly.
Condition 3.1: Provide earlier support for children and young people with SEND, improving inclusion practices and managing pressure points and school transitions.	Update 1 (May) **Green** Update 2 (August) **Amber** Update 3 (November) **Amber**	The Wiltshire SEND Local Area Partnership inspection was undertaken during this period. The outcome, which was to award the highest grading, and the final report was published on 6th December. In the report, inspectors specifically highlight how inclusive this system is saying "Wiltshire children benefit from an inclusive education system. The development of the 'ordinarily available provision for all learners' strategy has helped secure a system-wide commitment to inclusive practice in schools." Inspectors were also impressed with the early help offer in Wiltshire, and the work around school transition points. Receiving such positive, independent validation of the inclusion approach in Wiltshire has given leaders confidence that the direction of travel set out in the Sustainability Plan was the right one. However, this is not leading to complacency, and leaders understand that significant work is still required. The preventative early support activity that was expected during this quarter has been delivered, as was the case last quarter. However, the activity is not having an impact on overall EHCP numbers, and this is impacting our ability to meet financial targets.

EHCP Numbers	Apr '24	May '24	Jun '24	Jul '24	Aug '24	Sep '24	Oct '24
SV Forecast	5562	5586	5609	5632	5645	5649	5669
Actual	5728	5815	5867	5861	5932	6051	6161

The number of EHCPs is around 500 ahead of the forecast figure. Demand, as measured by the number of EHC Needs Assessment requests received, has continued to hold steady. This remains at the highest level it has ever been in Wiltshire, but the fact that demand is not continuing to increase shows a more stable system is emerging, that is significantly more predictable than it was when the plan was first submitted in December 2023. This is also in contrast to the reported position in other local authorities who are continuing to see their EHCNA request rate rise.

Agreement Condition	Assurance Level	Progress Update from this Quarter *Please include/refer to relevant data and evidence to support your rating and explain the scale of any impacts*

Legend: ● EHCNA Requests (Actual) ● EHCNA Requests (SV Forecast)

EHCNA Numbers (12 month rolling ave)	Apr '24	May '24	Jun '24	Jul '24	Aug '24	Sep '24	Oct '24
	97.83	97.00	98.44	98.92	99.58	99.50	98.58

There are a number of reasons why this condition is so far offtrack. Firstly, the predictions around how quickly impact would be felt were optimistic. This was partly due to delays with the onboarding of new staff, especially with those on school contracts, but also due to time required to drive forward systemic cultural change.

Secondly, the original forecast was based on a 5-year average, which included years where demand was artificially suppressed by the pandemic. An assumption was made that this suppressed demand was compensated for by the rapid growth in demand since the pandemic and the system might be returning to the mean. However, the demand this year has continued, and broadly follows a 2-year average line, rather than the 5-year line.

There has also been an impact because the council has made significant progress with clearing the EHCNA backlog, ensuring that where children and young people have a level of need which would warrant an EHCP, this is available to them. The result of this is that the backlog is now at its lowest level since 2020, but this has brought more plans forward.

This realisation has driven a re-appraisal and re-forecasting of the data trends in the system. There are five key insights:
  a) Demand is strongest in Early Years – which was understood before, but the new analysis has revealed that a quarter of assessment requests were made for three-year-olds last year.
  b) There appear to be opportunities to cease plans pre-16 when children and young people meet outcomes. According to the data, since 2020 fewer than 15 children and young people with SEND of statutory school age have 'met all outcomes' and been able to have their plan ceased. This seems unrealistically low and does not align with Wiltshire's strong attainment data for children and young people with SEND.

SAFETY VALVE PROGRAMME DETAILED UPDATE		
Agreement Condition	Assurance Level	Progress Update from this Quarter *Please include/refer to relevant data and evidence to support your rating and explain the scale of any impacts*
		c) While improving significantly this year, the No to Assess and No to Issue rates in Wiltshire are lower than our statistical neighbours. This implies that there are further opportunities to improve the robustness of decision making in this area underpinned by effective SEND support for children and young people who are pre-statutory. d) There have been consistent and sustained shifts 'up' in placement, with more children going into Special School or Independent Special schools and whilst multi-disciplinary decision-making and allocation of resource are robust, work is ongoing to increase the volume and breadth of specialist provision available within our local SEND system, in line with the council's ambitious Specialist Place Planning strategy. e) More children with EHCPs are now funded on a Band 3 or 4 plan instead of a Band 0 or 1 plan. This is reflective of school funding pressures which are seen nationally and experienced more profoundly in Wiltshire as an F40 council. The EHCP Top-Up Funding review is focussed on prioritising funding allocations based on need and bringing our system into balance. f) The biggest growth areas are in Social Emotional and Mental Health (SEMH) and Speech Language and Communication (SLCN) which have grown as a proportion of EHCPs. Given these insights, changes to the plan have focussed on accelerating or developing proposals in the following areas: 1. Training to improve confidence in the mainstream inclusion offer. 2. Improve communication around mainstream inclusion. 3. Communicate the inclusion offer more explicitly. 4. Develop the support which is part of inclusion offer. 5. Support children and young people with SEN through transitions. 6. Work with Public Health to develop a more effective early help offer. 7. Change our processes to offer Social Care Early Help Assessments earlier. 8. Greater support in Early Years 9. Increased prioritisation of Annual Review attendance and focus on Outcomes met, supporting pre- and post-16 ceases. In addition to these proposals, which will generate a large benefit in the medium to long term, Wiltshire Council are committing to urgent action to arrest the negative movement. The authority has set an ambitious target of stabilising EHCP numbers by April 2026. This will be done through a limited number of highly targeted, tangible projects. • A small team who will work intensively with parent carers over a period of 6-8 weeks seeking to solve problems quickly and efficiently, avoiding recourse to statutory assessment. • A more intensive approach to utilising Early Help and Early Support Assessments in Early Years which includes the Early Years Pathway Navigators who are starting in January 2025.

SAFETY VALVE PROGRAMME DETAILED UPDATE		
Agreement Condition	Assurance Level	Progress Update from this Quarter *Please include/refer to relevant data and evidence to support your rating and explain the scale of any impacts*
		• Targeting support to schools who appear to be outliers in the data, based on inclusion metrics, and working with them to support best practice and inclusion. • Work to identify children and young people with EHCPs who are close to meeting all of their outcomes, prioritising their annual reviews and celebrating successes and step down from an EHCP. In parallel, training on producing SMART outcomes will be prioritised at system-wide level. These 4 interventions are expected to have an impact on EHCP growth of 39 plans a month, which is £30m over the life of the plan. This gives the system a much better chance of achieving balance through the medium-long term interventions articulated in the original plan.
Condition 3.2: Prevent the need for escalation by providing the right support, first time, including a more holistic response alongside health and social care, with improved management and communication.	Update 1 (May) **Green** Update 2 (August) **Green** Update 3 (November) **Green**	The activity that was planned to support this agreement condition is on track. The percentage of children and young people in Independent Non-Maintained Special School (INMSS) placements is broadly in line with the figures reported at the last quarter (5.86% in July, 5.62% in October) and so this workstream is RAG rated as Green – on track. These percentages equate to one fewer INMSS placement in October as compared to July, but 44 more than this time last year. Independent sector placements are only commissioned where there is no maintained provision available in county. Robust decision-making at point of placement occurs in Wiltshire. Opportunities for planned step-downs at age-phase transfer points and appropriate points mid-phase continue to be actively explored. These step-downs will accelerate when our new local planned specialist placements come online, and we are developing options to use modular or temporary accommodation to bring this forward. The Local Area Partnership inspection highlighted the strong partnership work, which is already happening in Wiltshire, as well as the ongoing commitment to provide a truly holistic response to SEND need. To this end, the partnership has been working on a toolkit for schools to support them in managing medical needs in mainstream settings. This joint piece of work, between the council and ICB will launch in January 2025. The clarity around responsibilities and where to turn for support or advice should help schools and settings feel more confident and reduce any need for escalation. The rollout of Family Hubs was highlighted in the August report as an area of good practice, and these have continued to be an area of

SAFETY VALVE PROGRAMME DETAILED UPDATE		
Agreement Condition	Assurance Level	Progress Update from this Quarter *Please include/refer to relevant data and evidence to support your rating and explain the scale of any impacts*
		strength. Work is ongoing to understand what can be done to further support this service as it currently has a waiting list. The main drivers for referrals are mental health of parent carers or children and young people. The 'go-live' date of the SEND early help line was pushed back due to the Local Area SEND inspection creating a pause in the induction plan that was in place. However, this has now launched. The consultation on EHCP top-up funding has opened as planned. The proposal will secure special school funding, to ensure that the system avoids INMSS placements, and will address the current trend whereby schools regularly seek 'up-banding'. The expectation is that, should this proposal be adopted, it will re-link funding to need. Recognising the need to address the growth in INMSS placements, the authority is also taking urgent action in this area. These proposals aim to reduce growth in INMSS placements by 20% by April 2026, above and in addition to the expected reduction generated by action under Condition 3.3 (increasing availability of maintained special school and resource base placements). This action is focussed both on stepping down children and young people mid-phase as part of the annual review process, and on establishing Assistant Education Officer posts to ensure support and challenge is available to push back on no responses from schools, where appropriate, thereby preventing escalation,
Condition 3.3: Increase the number of special school placements, resourced provision, and alternative provision to ensure that children and young people can access the support they need, with proper reintegration support for children who can be appropriately supported in mainstream provision.	Update 1 (May) **Amber** Update 2 (August) **Amber** Update 3 (November) **Amber**	As was the case in August, significant progress has been made against this condition, however the delivery of special school places is still Amber – Off Track. 156 new special school places were due to come online in September, but unfortunately only 98 were delivered. These delays were due to a new academy free school being unable to take children up to expected PAN following challenges with leadership and staffing capacity (DfE regions group has full awareness). Also, delays in Ofsted registration timeline for an independent provision within local authority premises, run by a subsidiary company of a MAT with special school expertise. Work is underway to bring the growth in places back on track as soon as possible within the current academic year. Confirmation of the capital funding to support new special school places in the south of the county has secured the next phases of this work. Urgent work was required to move this crucial scheme forward to secure the site and to get approvals. This workstream is now on track and is forecast to deliver a new 120 place special school will start to take pupils from September 2025. Another element of this work which has made real progress is the creation of further secondary resource bases. While the need for places had been identified, there was not a clear pathway forward. Thanks to highly focused work from the SEND team and dedicated project management resource from SEND transformation, there is now a clear

Agreement Condition	Assurance Level	Progress Update from this Quarter *Please include/refer to relevant data and evidence to support your rating and explain the scale of any impacts*
		pipeline, and schools lined up to launch new secondary resource bases from September 2025, and into the 2025/26 academic year. Following the rigorous commissioning and procurement exercise Brunel Education (a subsidiary company of Brunel Academies Trust) were awarded the contract to deliver education provision from Melksham House on 1st July 2024, at a Wiltshire owned building. The provision will include places for 50 primary age learners with SEMH needs who have an EHCP. The provision will also support a cohort of up to 25 secondary age learners with an EHCP who have SEMH needs. The provider will also be working with the local authority in supporting our outreach model to support the wider system in delivering high quality education for learners. The provider has now commenced the Ofsted registration process which we hope to conclude in early 2025. To ensure a greater continuum of offer for learners, Wiltshire Council is currently undertaking a procurement exercise to appoint a provider to deliver DfE registered Alternative Provision from a Wiltshire owned building. The commissioning specification has been updated to reflect the latest demand modelling for SEMH needs, and a new tender process will begin within the next 3 months. This provision will be for 50 secondary age young people, including children with or without an EHCP, which aims to have places commissioned by the local authority and schools directly. As with Melksham House, the provider will be expected to support the wider system with an outreach model that delivers high quality education for learners.
Condition 3.4: Improve transition pathways to provide a range of opportunities for young people with SEND to prepare for adulthood, including training, further education, and employment.	Update 1 (May) **Amber** Update 2 (August) **Amber** Update 3 (November) **Amber**	In May and August, it was reported that the system expected to be back on track for this condition by November. This has not been achieved. Project activity has been delivered on time; however the data is behind target and despite assurances that ceasing would pick up, this has not been achieved. Ceases have dropped from 32 a month in July to 28 a month in October (based on a 12-month rolling average). The rate of ~~young people~~ becoming NEET has continued to decline and

Agreement Condition	Assurance Level	Progress Update from this Quarter *Please include/refer to relevant data and evidence to support your rating and explain the scale of any impacts*
		so the authority should, rightly, be proud of the work done to support children and young people with SEND into education or employment. However, the numbers need to be higher without this percentage increasing. The authority has taken on a new Project Manager focussed primarily on the post-16 space, and great progress has been made in creating a structured and strategic plan for this workstream. A new document articulating the pathways for children and young people with SEND has been produced and should be published early next year. This document clearly sets out the options for children and young people with SEND in Wiltshire, so that realistic but ambitious conversations can be held. The Post 16 Partnership and Strategy group has been guiding this work as part of their development into a more strategic cross-system group. Partners meet on a regular basis to identify progress against priority actions and to ensure that work is moving forwards. This has led to a greater focus on developing employment and education pathways as well as work towards improved transition planning. This work will also be reflected in our strategic action plan, post-SEND AP inspection.
Condition 3.5: Foster a culture of change across the Wiltshire SEND and AP system by engaging with partners and parent carers, improving trust and co-production across the sector.	Update 1 (May) **Green** Update 2 (August) **Green** Update 3 (November) **Green**	This deal condition is currently green – on track. The authority has continued to engage partners and parent carers to ensure that trust remains high. The first substantive meeting of the Stakeholder Reference Panel was held, which brings schools and settings, parent carers, and voice of children and young people together to discuss the development of the transformation projects. The agenda for the meetings is driven by the members themselves and after the meeting, a "You Said, We Did" report was generated so that members can recognise how we responded to their comments and will be able to see the direct impact that they had on the projects. The projects discussed at this panel were: the Inclusion Charter, EHCP Funding, SEMH Graduated Response, specialist support in early years, and improvements to the behaviour support service.

SAFETY VALVE PROGRAMME DETAILED UPDATE		
Agreement Condition	Assurance Level	**Progress Update from this Quarter** *Please include/refer to relevant data and evidence to support your rating and explain the scale of any impacts*
		As a snapshot, a survey about how supportive the panel members were of each project were taken before the agenda item and then after it. Confidence that these projects will improve outcomes for Children and Young People with SEND in Wiltshire increased by just over 10%. Alongside this 'showpiece' engagement event, project managers are continuing to bring stakeholder voices into their work on a regular basis. This mirrors the commitment shown to co-design during the development of the plan. At an early stage in the projects, representative groups are given the chance to feed in. This includes Wiltshire Parent Carer Council (WPCC), Schools Forum, and the System of Excellence Steering Group. System of Excellence Steering Group is made up of the special school headteachers, and representatives from mainstream schools, early years, the ICB and post 16 providers. This group have had a substantive impact on the work that is happening in the Wiltshire system and are a key part of driving culture change. Work to create an in-house replacement for the POET survey is continuing and this new survey is expected to go live early in 2025. This survey will be supported by AI review and interpretation algorithms to assist with processing and ensure that the team can see changes and trends as soon as possible. These metrics will be used to measure the effect of culture change efforts in the system and to understand where the council needs to improve communication, in terms of what is said, how it's said and where it is said.

RAG	Definition
	Savings/cost avoidance and/or workstream(s) complete
	Savings/cost avoidance and/or workstream(s) remains on target
	Savings/cost avoidance and/or workstream(s) are currently off target, with plans to mitigate
	Savings/cost avoidance and/or workstream(s) are off target

SAFETY VALVE PROGRAMME RISK REGISTER			
Risk	Assurance Level	Mitigation	Progress Update from this Quarter
Risk 1: There is a risk that **unpredictability in the system** could lead to the authority failing to meet financial targets despite the plan working.	Update 1 (May) **Green** Update 2 (August) **Green** Update 3 (November) **Green**	The authority needs to remove as much unpredictability from the system as possible. This will include: 1. Clearing the backlog of EHC needs assessments to remove the unknown risk around those plans. 2. Map and improve financial decision-making to ensure it is clear and has the right level of scrutiny and rigour. 3. Increase the visibility of financial decision-making in the system to all partners so that they are better able to forecast accordingly.	• The investment in Educational Psychologist capacity has continued to benefit the system and the authority remains on track to clear the backlog by April 2025. • Work has continued to look at how EHCPs are funded and proposals for a new funding scheme are now out to consultation. This will rebalance the system and lead to a reduction in ad hoc funding payments, and requests to increase banding which are not needs led.
Risk 2: There is a risk that a **failure to maintain trusted relationships** could fundamentally erode faith in the inclusive vision for our SEND system	Update 1 (May) **Green** Update 2 (August) **Green** Update 3 (November) **Green**	The authority will continue to hold stakeholders close to this work and co-design the projects with them. The messaging and communication will emphasise the importance of co-design and of improved outcomes from children and young people with SEND. Quick wins early in the project will deliver tangible improvements for stakeholders and children and young people with SEND.	• The Ofsted/CQC Local Area SEND inspection has highlighted good working relationships in the system. • The first Stakeholder Reference Panel was undertaken, and those results are being fed into the transformation work. • Open working relationships with Wiltshire Parent Carer Council (WPCC) have enabled mature conversations about the work. • Consultation with schools on 1% transfer from the Schools Block as part of the Safety Valve plan has highlighted strong feelings from Head Teachers about affordability for schools to make this level of contribution. The council is listening carefully to schools and is identifying mitigations.
Risk 3: There is a risk that partners struggle to engage at the required pace leading to a **slower pace of change** than is required to meet the plan.	Update 1 (May) **Amber** Update 2 (August) **Green** Update 3 (November) **Green**	The authority will continue to engage partners and check-in with them about pace of change and progress. Recognising that the financial risk lies with the local authority, the programme team will remain cognisant that other partners will have differing priorities. The authority will ensure that the benefits for other partners are clearly articulated.	• Further work has been undertaken to articulate and communicate the positive outcomes for schools and settings. • Key partners, including Schools Forum and the ICB, have reiterated their commitment to the delivery of this plan.

SAFETY VALVE PROGRAMME RISK REGISTER			
Risk	Assurance Level	Mitigation	Progress Update from this Quarter
Risk 4: There is a risk that **failure to access the required capital** leaves the system reliant on expensive independent special school places.	Update 1 (May) **Amber** Update 2 (August) **Amber** Update 3 (November) **Blue**	The authority has put in a request for £5.7m of additional capital through the Safety Valve programme, and this would deliver an extension to a special school in the south of the county. Other projects need to have allocated capital. The authority has considered options to reduce reliance on the capital, essentially derisking the project, but 120 additional places for £5.7m already represents excellent value for money, and Wiltshire has a low number of special school places for a county of its size. It is difficult to imagine an alternative that would reduce reliance on INMSS placements while still meeting the statutory obligations.	• Access to capital has been completed and work is progressing.
Risk 5: There is a risk that system **partners struggle to recruit or resource the changes** required in our system leading to failed attempts at change.	Update 1 (May) **Amber** Update 2 (August) **Amber** Update 3 (November) **Amber**	The authority must maintain contact with key partners and include them in decision making so that it can take account of the impact of the transformation programme on their services. The authority will also review unintended consequences that might impact partners and will offer support with recruitment where possible.	• Partners remain fully engaged with the work at a strategic level and so monitoring is underway. • Recruitment support for special schools is being delivered to help them get the staff they need to support this transformation.

Sustainability Plan Evolution

Background

As was reported to the Board in June, and expanded on in August, the High Needs Block Sustainability Plan is off-track. This position was confirmed by the Quarter 2 forecast, which shows a forecast DSG overspend of £43m instead of the £28m which was expected when the plan commenced.

The update report submitted to the Department for Education (DfE) at the end of August described this position and set out the steps that are already being taken to address it.

Feedback from the advisors assigned to Wiltshire Council was that, while one monitoring report 'off-track' was unlikely to result in the Council entering "Enhanced Monitoring and Reporting" (EMR), there was an expectation that the November report would include significant revisions to present a credible plan to the DfE.

At the same time, internal stakeholders have also been clear that they want to see revisions that re-baseline and re-forecast the plan so that assurances can be given about the approach to addressing SEND sustainability.

This document pulls out the changes that we are making to our plan, and the pressures we've identified which these changes will address.

Key Drivers

In preparation for this update to the sustainability plan, and to support the development of our SENDIAP Strategy Implementation Plan, further data analysis has been undertaken. This has revealed some key patterns, and trends which underpin the interventions laid out in this document.

The most impactful levers that are available to us remain the same, and are the focus of this amended plan:

- Number of EHCPs
- Number of ceases
- Number of Independent Non-Maintained Special School (INMSS)

Growth in the number of EHCPs

Given the actual number of EHCPs in our system is significantly above where we wanted it to be at this stage, a re-baselining and re-forecasting has been done. This has given us a new 'unmitigated' trajectory against which we can measure ourselves. This 'data led forecast' suggests that we are currently on course to hit 7,491 EHCPs by the end of 2028, compared to 7,001 plans in the original forecast, and 5,893 in the mitigated plan.
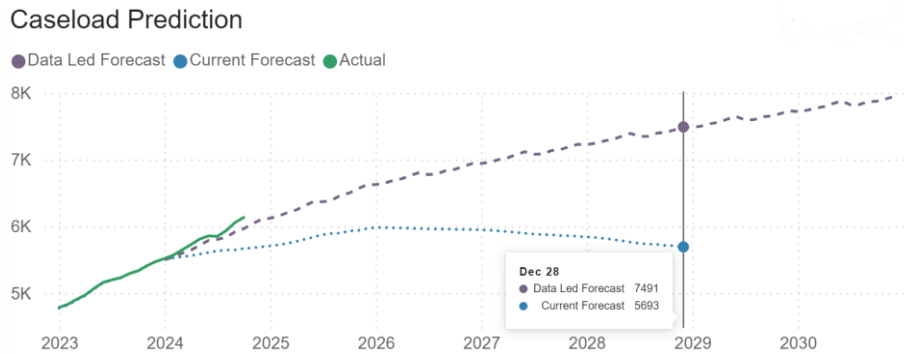
Figure 1: Graph showing the forecast growth in EHCPs

The Actual figure is above the Data Led Forecast, and this is due to the additional plans brought off the backlog through investment in agency Educational Psychologists.

This revised forecast gives us a significantly more challenging starting point and highlights the need to ensure that our plan responds to the higher levels of demand in our system.

Confidence in the mainstream inclusion offer
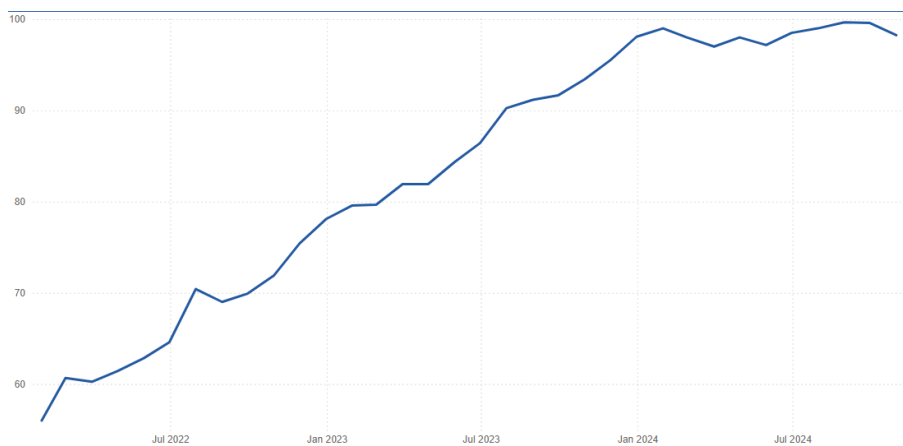
Figure 2: Graph showing the 12 month rolling average of EHCNA requests in our system.

One of the key measures that we had in our plan was the number of Education Health and Care Needs Assessment requests in our system. This measure indicates the confidence in mainstream inclusion in our system as we expect demand will fall when people believe children are supported without the need for statutory support.

This grew steadily from 2021, peaking at 99 requests per month in January 2024. However, since then start of 2024 this growth in demand has slowed, levelling out at 95

– 99 requests a month on average. This has given us a slightly more stable position to work from, but the rate is still at its highest ever level.

This does indicate that some of our work to improve confidence in mainstream inclusion may be cutting through, but there is still significantly more to do.

Age Distribution of Requests

Academic Age	2020	2021	2022	2023	2024
1	0.20%			0.17%	
2	1.59%	3.95%	5.01%	3.99%	4.57%
3	26.39%	23.52%	24.09%	23.60%	15.23%
4	4.76%	5.16%	4.80%	4.84%	4.90%
5	7.14%	4.86%	5.97%	7.39%	7.51%
6	8.33%	4.10%	5.97%	7.81%	7.83%
7	6.75%	8.80%	6.08%	6.62%	8.71%
8	7.74%	6.07%	8.00%	6.54%	7.62%
9	9.33%	8.80%	9.81%	10.10%	10.34%
10	9.13%	12.59%	9.28%	9.34%	7.18%
11	2.98%	3.79%	3.52%	2.89%	3.59%
12	3.77%	5.61%	4.90%	5.18%	4.57%
13	3.57%	4.40%	4.16%	4.07%	6.31%
14	2.78%	3.19%	3.94%	3.31%	6.75%
15	2.98%	3.03%	2.56%	2.89%	3.05%
16	0.99%	0.91%	0.53%	0.51%	0.65%
17	0.79%	0.61%	0.64%	0.34%	0.87%
18	0.60%	0.46%	0.11%	0.25%	
19		0.21%	0.17%	0.33%	
20			0.21%		
22	0.20%	0.15%	0.11%		

Figure 3: Table showing the age distribution of new EHCNA requests from 2020-2024

Early Years
The level of demand in early years remains a concern. Last year around a quarter of requests came from 3-year-olds and, while the percentage is lower so far this year, it still represents the most common age.

Transitions
The second most common time for a plan to be requested is 9/10 years old as the child begins to approach transition to secondary school.

We know from previous work that parent carers worry that someone who had coped in a smaller primary school may struggle at secondary.

Number of EHCP ceases

Another measure that we have been monitoring is the number of plans ceased, that do not result in NEET. 2023 was a record year in terms of ceasing and, while we hoped to exceed that this year, it doesn't appear this this will happen. This is partly due to disruption in the post 16 team, but we are keen to review what more we can do.

Figure 4: Graph showing the 12-month rolling average of plans ceased.

One pleasing thing is the decline in the rate of Ceased Plans that result in that young person ending up Not in Education, Employment or Training (NEET). This has steadily fallen since a peak in 2022 and has fallen more steeply since our sustainability plan began being implemented. This can reassure us that we are not inappropriately ceasing EHCPs.
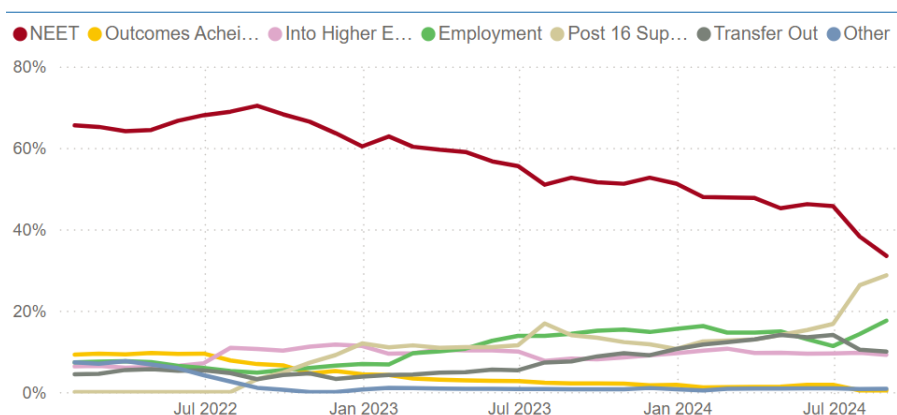

Figure 5: Graph showing the 12-month rolling average of reasons why Post-16 plans were ceased.

However, we did take a look at the number of ceased plans for under-16s, and there is work to be done there. The predominant reason for under-16 plans to be ceased is "Transfer Out", all other reasons barely register. We would like to see more children who, at their annual review, are recognised as having achieved their outcomes and so their plan can be ceased because they are able to access their education without the need for that statutory support.
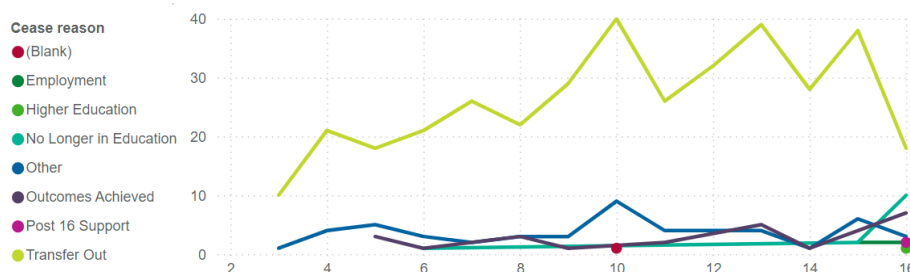
Figure 6: Graph showing the number of children, under 16, who have had plans ceased broken down by age and reason for cease.

Growth in the number of Independent Sector Placements

Date	% placed in INMSS	vs 2023 Stat Neighbour	# placed in INMSS	vs last year
31/10/24	5.87%	0.15%	362	43
30/09/24	5.92%	0.20%	359	48
31/08/24	4.88%	-0.84%	290	51
31/07/24	5.29%	-0.43%	310	64
30/06/24	6.02%	0.30%	353	61
31/05/24	5.98%	0.26%	348	64
30/04/24	6.02%	0.30%	345	63
31/03/24	5.91%	0.19%	334	58
28/02/24	6.02%	0.30%	336	61
31/01/24	5.86%	0.14%	324	59

Figure 7: Table showing the percentage of EHCPs in Independent Special Schools

In addition, we have also been monitoring independent (INMSS) placements. While our % of children in INMSS is lower than we expected, because of the number of EHCPs in our system, we currently have around 45 more placements than this time last year.

Understanding what can be done to address this is vital to returning financial balance to our system.

Short term interventions

Target system

In response to the new forecast, and the accelerating growth of EHCPs, we have reflected on the need to take urgent action to address it. Many of the interventions in our original plan were medium/long term, relying on culture change and behaviour change. Ultimately, these interventions will deliver the biggest impact, but they will take a couple of years to have measurable impact.

We are significantly revising our strategic approach to delivery – within the framework of our values. This approach will see us take six highly tangible steps over the next 18 months with an aim to stabilise EHCP growth in Wiltshire.

This is only possible, because EHCNA request numbers have sat stable, and so demand levels in our system are therefore stable, making measurement and predication much easier.

Per month	EHCNA request	No to assess	No to issue	Ceased plans	Net annual growth
Wiltshire 2023	97*	12.0%	3.9%	29	636
Stat Neighbours 2023	-	25.0%	5.0%	44**	-
Target System	66	25.0%	5.0%	44	36
Change Required	-31	+13.0%	+1.1%	+15	-

* 97 EHCNA requests a month represents the 12 month rolling average during 2024
** 44 plans ceased is adjusted for population size

These targets are there to give us an understanding of the "shape" of a sustainable system, and to focus us on the change required. They are not, and cannot be, hard and fast targets. A child or young person in Wiltshire who needs support through an EHCP will always be granted a plan: there will be no 'cut off' and we will remain legally compliant.

Six interventions

1. Addressing 'poor practice' in schools
Expected impact: reduction of 8 EHCNA requests a month   By Apr '25

Through the data that our teams already collect, we can identify unwarranted variation in school practice. By targeting resource from existing teams, and directing at schools which appear to be outliers, we anticipate that we can have a significant impact on changing practice, and ensuring that those schools are delivering what they should be through OPAL, and therefore meeting need without a statutory plan.

We would hope to over-deliver against a relatively modest target of 8 EHCNA requests a month, and we would measure this in the monthly EHCNA request numbers from our target schools.

2. Pre-DaD1 support
Expected impact: reduction of 8 EHCPs per month   By Jun '25

The Wiltshire Council Family And Children Transformation (FACT) programme has demonstrated the value of relational practice in delivering support services. Building on these principles, we would propose to deploy a small team of navigators/advocates to work alongside families. This team would select EHCNA requests where they think they can have an impact and use the 6 week statutory process to get to know the family, understand their issues, and introduce professionals who can provide longer term support. At the end of the process, a "No to Assess" decision can be issued, because that child or young person is getting what they need from other sources.

This is a new approach, and a new service, and so the target of 8 EHCPs a month is a reasonable starting point. This is based on an average of 97 requests coming in, of which 32% come from parent carers, which is where we think they will have the biggest impact. Half of that number is 16, of which we think we could reasonably expect to have a 50% success rate. We will measure this by directly tracking the cases that this team manage.

3. Early Years ESA
Expected impact: reduction of 15 EHCNAs per month   *By Jun '25*

We recognise the challenges in demand in Early Years – especially for 3-year-olds. Apart from a limited number of very clear-cut cases, it is challenging to identify SEND in pre-school age children. Even where there is a possible SEND need, we believe that an Early Support Assessment (ESA), which takes a broader view of the child in the round, will tend to be more appropriate. These assessments can lead to more holistic support for the child, and support around the parent carers as well.

The target of 15 EHCNAs per month is based on 97 requests coming in per month, of which 27% are in early years. We are confident that, by offering a quality, alternative option we could reduce that number by about 60%. We will measure this by monitoring the number of plans coming in from Early Years, and comparing that to the rise in Early Support Assessment.

4. Additional post-16 ceasing
Expected impact: increase of 10 plans ceased per month   *By Sept '25*

We recognise that we need to focus on ceasing the plans which can be ceased in the post-16 space. We have noted the progress made in other areas, and the opportunity to change the narrative around ceasing so that it is seen as a 'success' for the young person. This will be a renewed focus for our Preparing for Adulthood team, and annual reviews will be prioritised where this opportunity exists.

The target is based on a sensible increase, working towards the cease rates which are managed in Statutory Neighbour councils. This will be measured by monitoring the number of ceased plans compared to the previous year, and through the 12-month rolling average.

5. Pre-16 ceasing
Expected impact: increase of 5 plans cease per month   *By Jan '26*

In the past 5 years, just 15 EHCPs have been ceased in Wiltshire for children and young people under-16 who have met all their outcomes. We know that our schools are providing a better education than that, and that our children and young people are

achieving. This belief has been bolstered by the recent SEND Local Area Inspection. We do accept that this will be a challenging project to undertake, and that the work to ensure the narrative around ceasing significantly changes, but through a rigorous programme of training on writing good outcomes, by defining and promoting the support on offer when stepping down, and by prioritising annual reviews effectively, we believe that there is progress to make here. Ultimately, this is about celebrating the progress that our children and young people are making.

The target is an ambitious one of five plans a month, and we accept that it will take time – until January 2026 – for us to see those kind of outcomes. We will measure this by counting the number of plans ceased for pre-16s due to "met all outcomes" and this will be measured against the baseline of 3 a year.

6. Improving our decision-making

Expected impact: increased "no to assess" and "no to issue" decisions   By Jan '26

As has been discussed previously, we need to ensure our decision-making is robust and evidence-based. Children who should get a Yes, will get a Yes, but children who should get a No, need to have a No so that we can appropriately support the children who need an EHCP. Our statistical neighbours has significantly higher rates of no to assess, and no to issue, in 2023, which tells us that some more progress can be made.

Targets are based on what Statistical Neighbours achieved in 2023, and may need to be revised when the SEN2 data for 2024 is published. We expect to achieve what our Statistical Neighbours manage, on average, by the submission of the SEN2 data in January 2026. Progress has already been made in this space, eg. our 2024 year-to-date percentage of No to Assess has climbed to 17.6%.

	EHCNA Requests	No to Assess	No to Issue	EHCPs Ceased
Current System	97	12.0%	3.9%	29
Addressing Poor Practice in schools	8			
Pre-DaD1 support	8			
Early Years ESA	15			
Additional post-16 ceasing				10
Pre-16 ceasing				5
Improving our decision-making		13%	1.1%	
Total change	31	13%	1.1%	15
Target System	66	25%	5%	44

Plus two

In addition, given the pressures on EHCP numbers that we are already under and consequent rise in INMSS placements, we also need to consider what steps we can take to urgently reduce growth in this area.

1. Mid-phase step downs

Expected impact: Reduction in INMSS growth of 10%   By Apr '26

Traditionally, we have focused on step-downs out of INMSS at the end of a school phase, however, we need to consider the opportunities to do this mid-phase too. Several enabling factors need to be in place, including having the right placements to

step them down into. We are looking at what can be done to accelerate delivery of special school placements, including the use of modular units within the existing maintained/academy special school estate.

2.   Assistant Education Officer posts

Expected impact: Reduction in INMSS growth of 10%   *By Sept '25*

We are also looking at the development of an assistant Education Officer post to ensure there is capacity to support and challenge all settings in Wiltshire around their provision for children with plans. These would operate in the same way that the Mainstream Inclusion School Advisors (MISAs) are already having an impact on supporting schools around children without a statutory plan.

Medium/Long term interventions

In response to the new forecast and our improved understanding of our system, we have revisited the interventions in our plan and considered if they are sufficient. The existing plan was very reliant on culture change and invest to save – these interventions will have a significant positive impact on the quality of support in Wiltshire and the financial deficit, but will take longer for the impact to be felt.

66 specific changes have been proposed, including 27 new interventions that we will undertake. The activity to set these up will begin over the next 12 months, but we expect that the impact will only begin to be felt in 2026.

Interventions have been categorised below as follows:

- **New** – new projects which were not in our previous plan and will make an impact
- **Accelerate** – projects which were in our plan and can be delivered faster so the impact is felt more quickly
- **Optimise** – projects which were in our plan and can be improved so the impact is bigger
- **Pause** – projects which we were going to deliver, but will be deprioritised in favour of more effective projects

#	Intervention	Change	Timeframe
1 - Training to improve confidence in the mainstream inclusion offer			
Impact: reducing the number of EHCNA requests.			
1.1	Map the training offer and ensure it's accessible.	Accelerate	By March 2025
1.2	Develop a training offer for Parent Support Advisors.	Accelerate	By April 2025
1.3	Create tailored training offer for schools, settings and parent carers.	New	By June 2025
1.4	"System" level training for senior practitioners, trust CEOs and Heads.	New	By Dec 2025
1.5	Record and evidence the impact of training and how it is embedded and sustained.	New	By June 2025
1.6	Upskilling school workforce on good quality paperwork and evidence.	Accelerate	Rolling process starting Jan 2025
2 - Improve communication around mainstream inclusion			

	Impact: reducing the number of EHCNA requests.		
2.1	Develop a clear communication strategy for engaging with parent carers.	Accelerate	By March 2025
2.2	Develop case studies about the benefits of support without an EHCP.	New	By March 2025
2.3	Review communication metrics and optimise for best communication.	Accelerate	By end of the calendar year
2.4	Develop advice for parent carers when choosing schools.	New	By Jan 2025
2.5	Ensure 'easy read' versions of OPAL are accessible.	Accelerate	By June 2025

3 - Make the inclusion offer more explicit

	Impact: reducing the number of EHCNA requests / increasing the number of No to Assess decisions.		
3.1	Map the support available without an EHCP and ensure it is clearly explained.	Accelerate	By the end of the calendar year.
3.2	Create an inclusion charter / framework.	Pause	Delayed to 2025/26 school year – in line with the charter mark.
3.3	Continue to develop the dyslexia friendly school model.	Accelerate	By Sept 2025
3.4	Create an inclusion "charter mark" to incentivise schools that brings other schemes together.	Accelerate	Launching 2025/26 school year.
3.5	Hold an inclusion conference to bring professionals together and share best practice.	New	In July 2025
3.6	Develop information on OPAL that schools should hold on their website.	New	By March 2025

4 - Develop the inclusion offer

	Impact: Reduce the number of EHCNA requests.		
4.1	Create new behaviour support service in secondary schools	Optimise	By March 2025
4.2	EBSA pathway that provides a coordinated local area offer of support	New	By Sept 2025
4.3	Increase Educational Welfare Officer capacity to focus on attendance	Optimise	By Sept 2025
4.4	Extend OPAL to include post-16	Accelerate	By March 2025
4.5	Develop a graduated response pathway for SEMH	Accelerate	By Feb 2025

5 – Support children and young people with SEN through transitions

	Impact: Reduce the number of EHCNA requests.		
5.1	Introduce a one page profile to help with transfers	Accelerate	By Feb 2025

5.2	Develop and implement a model of temporary transition support funding	Accelerate	By Feb 2026
5.3	Create a suite of tools to support parent carers with transition	New	By Feb 2025

6 - Work with Public Health to develop a more effective early help offer			
Impact: Reduce the number of EHCNA requests.			
6.1	Enhance guidance for schools on the universal offer – especially around emotional health	Optimise	By Feb 2025
6.2	Further rollout and embedding of trauma informed practice	Optimise	By July 2026
6.3	System-wide training on relational approaches	New	Rolling programme starting Dec 2025
6.4	Further development of the Healthy Schools Programme	Optimise	By July 2025

7 - Change our processes to make use of early help			
Impact: Reduce the number of EHCNA requests.			
7.1	Survey Early Years providers and Health Visitors to gain feedback on ESA process	New	By Mar 2026
7.2	Merge SEN Support Plan and Early Support Assessment	Optimise	By Jan 2025
7.3	Further develop the SEND understanding in the Integrated Front Door	Accelerate	By Jun 2025

8 - Greater support in Early Years			
Impact: Reduce the number of EHCNA requests.			
8.1	Rollout Early Years OPAL and guidance	Optimise	By July 2025
8.2	Deliver training on primary areas of need across our early years system	New	By July 2025
8.3	Continue to promote Dingley's Promise Inclusion project.	Optimise	Ongoing
8.4	Early Years Inclusion Advisors will review a comprehensive training package.	New	By July 2025

9 - Change the conversation around ceasing			
Impact: Increase the rate of plans ceased.			
9.1	Change the language and story we use around ceasing.	New	By Feb 2025
9.2	Support schools to have conversations about ceasing.	New	By Sept 2025
9.3	Change the paperwork to ensure that ceasing is discussed from the start of an EHCP process.	New	By Sept 2025

10 - Prioritise Annual Reviews to enable pre-16 ceasing			
Impact: Increase the rate of plans ceased.			

10.1	EHCPs to focus on celebrating success, progress, and how the child or young person can move forward.	New	By Sept 2025
10.2	Roll out training on annual reviews to ensure consistency.	Accelerate	By Jun 2025
10.3	Ensure planning for annual reviews is cohesive and includes well-crafted outcomes.	Optimise	By Jun 2025
10.4	Support and training for parent carers around their rights without an EHCP in place	New	By Sept 2025
11 – Improve confidence in the options post-16			
Impact: Increase the rate of plans ceased.			
11.1	Produce clearly mapped pathways for young people with SEND.	Accelerate	By Jan 2025
11.2	Support PfA pathway with case-studies, resources, and link to universal services.	Accelerate	By Mar 2025
11.3	Develop and raise awareness of health, social care and education offer to young people	Optimise	By June 2025
11.4	Understand options to incrementally transition support instead of a cliff-edge.	New	By July 2025
11.5	Drop-in surgeries about PfA Pathways on regular basis for young people and parent carers.	New	By Sept 2025
11.6	Increase the number of young people accessing employment and volunteering.	Optimise	Ongoing
11.7	Co-produce One-Page "How to plan for my future" template underpinned by e-learning.	New	By July 2026
11.8	Review opportunity gaps for SEMH and complex learners.	Accelerate	By Jan 2026
11.9	Seek out opportunities to develop independence skills in local communities.	Accelerate	By July 2026
12 - Deliver the capacity we need in Wiltshire			
Impact: Reduce the number of INMSS placements.			
12.1	Deliver more special school places	Accelerate	Ongoing
12.2	Deliver more Secondary Resource Base places – especially in SEMH, C&I and C&L	Optimise	Ongoing
12.3	Deliver more Primary Resource Base places	Accelerate	Ongoing
12.4	Improve the AP offer in schools ensuring equitable geographical spread	Accelerate	Ongoing
12.5	Explore Special School Satellite provision	Accelerate	By July 2026
13 – Strategically review our commissioning intent			
Impact: Reduce the number of INMSS placements.			
13.1	Use outcomes from DaD2 and DaD4 to inform provision	New	Ongoing with an initial review in March 2025
13.2	Ensure place-planning forecasts are triangulated with key data sets	Accelerate	Ongoing

13.3	Engage an external consultancy to conduct a gap analysis for our specialist provision.	New	By Jun 2025
13.4	Change commissioning narrative to ensure expectations are clear.	New	By Jun 2025
13.5	Review of ELP to understand good practice and how to spread that.	Accelerate	By July 2025
14 – Ensure guidance and approach supports 'downward pressure'			
Impact: Reduce the number of INMSS placements			
14.1	Refresh our guidance to schools and signpost support.	Optimise	By July 2025
14.2	Ensure the EHCP top-up review feeds into the strategic approach.	New	By Feb 2025
14.3	Implement a range of guidance and support around "waiting well" – including waiting for Special School placement.	New	By Jun 2025
14.4	Communicate a counter-narrative to the assumption that INMSS is the best option.	New	By July 2025