

Audit name	Recommendation	Priority	Target date	Update	Status	Owner
Education, Health and Care (EHC) Plan - Annual Review  <b>PREVIOUSLY OVERDUE</b>	Further investigation is to be undertaken by the service area on the 47 EHC Plans not recorded on the Synergy system as having an annual review.	2	31-Jul-21 Revised to 05-Nov-21	<i>This work was completed by business support in late November 2021. The principal casework manager has carried out a sample and can confirm that the work was complete</i>	In progress  Complete	Senior SEN Officer
EHC Plan - Annual Review  <b>PREVIOUSLY OVERDUE</b>	To look at the data analysis completed to understand which cases did not meet the timescale, to understand why the timescale was not met in order to ensure that the system can provide fewer cases out of timescale.	3	30-Sep-21 Revised to 19-Nov-21	<i>The purpose of the work was to ascertain whether the review report had not been received by the school in these 47 cases or whether we had received the report and then not recorded it on the system or if the workflow was started twice so that it looked like it had not been completed. It was found to be a combination of both of these issues.</i>	In progress  Complete	Senior SEN Officer
EHC Plan - Annual Review  <b>PREVIOUSLY OVERDUE</b>	1. Review of workflow to see if it can be improved to streamline the process so it is more user friendly. 2. Training of officers on the new workflow process.	3	30-Sep-21 Revised to 31-Dec-21	<i>Procedures have now been improved so that all reviews are captured and a new workflow is being implemented to support this. This work was delayed by COVID and then the manager going on maternity but is now been put in place. From the 1st of October 2022 we have a new process in place and the assistants have taken over the systematic recording of all annual reviews, this includes chasing officers for response decisions. We also know which of the phase transfer ARs</i>	In progress  Complete	Senior SEN Officer

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				<i>have taken place and which schools have not returned the paperwork yet. so this academic year we should be able to produce accurate reports on annual reviews.</i>		
Support for Young People who are NEET 2020-21  <b>PREVIOUSLY OVERDUE</b>	2. Monitoring of 16–24-year-olds with an Education Health and Care plan who are NEET. There is no formal performance measurement of 16–24-year-olds with an Education Health and Care plan who are NEET. There is also no mention of this cohort in relation to NEET in the Council’s County Plan or the Delivery Plan. Consideration should be given to the introduction of a corporate or a directorate performance indicator so that the effectiveness of the Council’s actions is measured.	3	31-Jul-21 Revised to 31-Jan-22 Revised to TBD	An Education Opportunity Area Plan is being developed which includes NEET. The NEET measure and target will be informed by this work. The recent publication of the Schools White paper in March 2022 has delayed the Education Opportunity Area plan as the White paper needs to be taken into consideration and inform the education plan. The Youth Employment Hub will have delivery targets which will include this group of young people.  <b>NEET target for those aged 16 to 24 with SEND EHCP = March 2021 data NEET/Not Known for those young people with SEND EHCP – Herefordshire is 7.5% below national at 9.3% - this year’s data has not been published yet for comparators.</b>  <b>NEET target for SEND EHCP to keep below national/stat neighbours 6.5% target</b>	In progress  <b>Complete</b>	Senior Adviser Post 16 Learning and Skills
Support for Young People	3. Council Website Information The Council’s website has a page entitled Support for young people	3	31-May-21 Revised to 31-Dec-21	Web pages have been updated accordingly and will continue to be kept under review as provision and	In progress	Senior Adviser Post 16 Learning and Skills

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<p>who are NEET 2020-21</p> <p><b>PREVIOUSLY OVERDUE</b></p>	<p>not in education, employment or training (NEET); but the information is out of date. It requires updating and monitoring to ensure accurate information and/or signposting for all the schemes is stated.</p>		<p>Revised to TBD</p>	<p>information changes. This is business as usual. The youth employment hub landing page will be hosted on the Talk Community website and is under -development. Slight delay due to needing to recruit staff to update website.</p>		
<p>EHCP Preparation for Adulthood</p> <p><b>DUE IN PERIOD</b></p>	<p>Seven young people with EHC plans detailing their complex needs were selected from the data sets provided. The purpose of the audit was to determine the extent to which the planning in the EHCP supported their preparation for adulthood as they progressed through their transition years 9, 11 and where available year 14.</p> <p>The EHC plans were reviewed in depth to identify references to outcomes and provision that would regarded as supporting their preparation for adulthood. This was to provide assurance that there was evidence of planning during the transition years, to assist the individual to maximise their potential for independence.</p> <p>As confirmed by the Senior SEN officer owing to the severity of their needs, i.e., severe learning difficulties and/or significant medical or physical needs experienced by the seven young people in the sample, progression in adulthood may be more limited in comparison to those</p>	<p>3</p>	<p>30-Oct-21 Revised to 31-Jul-22</p>	<p>The work to re-audit the same cases by SEND Officers took place. The purpose of the audit was to ascertain that EHC Plans contained sufficient health and care information in order to respond to the 2016 SEND Inspection letter that identified that they did not. The re-audit did identify greater evidence of health and social care input than had been identified by the SWAP audit but again, because of the small sample, it was not possible to gain sufficient assurance that relevant EHC Plans included sufficient health and care information. It has now been agreed by the Service Director that we will commission a SEND specialist consultant from West Sussex to audit a larger sample of recent cases to determine the degree to which the Ofsted/CQC recommendation had now been met. Similarly, a second recommendation had identified that EHC Plan objectives did not show a progression from school-age to adulthood that one might wish to see in the EHC Plans. Again, despite</p>	<p>In progress</p>	<p>Head of Additional Needs</p>

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	<p>with less severe needs. However, for these young people, for example, the ability to communicate the need for a drink is an important step towards independence.</p> <p>For the seven cases sampled it was identified that there were references to measures to be taken to support preparation for adulthood within the capabilities of the individual.</p> <p>Following the close out meeting the Head of Additional Needs advised that it is important to recognise that outcomes and provision that support preparation for adulthood are integral to the education, health, and care sections of the EHC Plan and will not be described in the plan as a discrete single section. However, the audit did identify that reference to health and social care within the designated section of the EHC plan was limited to identify preparation for adulthood. Reference to limitations of health and social care information is further reported below and in Appendix 2. The absence of clearly defined information limited the ability to track progress during the transition years from year 9 onwards. SWAP was advised that there is a national review of SEND which may have an impact on the current format of the template and that the Herefordshire</p>			<p>SEND Officers looking again at the original SWAP sample, we were not able to obtain sufficient assurance and we have also commissioned West Sussex to conduct a separate audit of relevant cases with a large enough sample size to determine the degree of assurance.</p>		

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	plan format has to include the nationally prescribed sections.					
EHCP Preparation for Adulthood  <b>FUTURE</b>	<p>Internal Audit reviewed one sample in depth with the Senior SEN Officer, to determine if the EHC plan was aligned to the Herefordshire Multi-agency Protocol for Children and Young People with Disabilities and Complex Needs. Not all elements were relevant, for example employment plans, owing to the limited capability of the young person being reviewed. Internal Audit selected a number of items from the protocol to assess. Owing to the response to the single sample it was agreed with the Senior SEN Officer that this could be the same for other cases, so no further testing was performed. The audit was unable to assess the support provided through collaboration with multi-agencies.</p> <p>Within the Herefordshire Multi-agency Protocol for Children and Young People with Disabilities and Complex Needs there is a:</p> <ul style="list-style-type: none"> <li>• Checklist within the protocol to verify all elements are acted upon, and</li> <li>• Case escalation procedure.</li> </ul> <p>However, the Senior SEN Officer was unaware of this guidance within the protocol. Additional work to embed the Preparation for Adulthood</p>	2	31-Jul-22		On track	Head of Additional Needs

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	<p>protocol and its detailed procedures needs to take place. This will ensure that all clients receive the full range of services and support that they need.</p>					
<p>EHCP Preparation for Adulthood</p> <p><b><i>DUE IN PERIOD</i></b></p>	<p>Ofsted report October 2016 In October 2016 OFSTED and the Care Quality Commission (CQC) Local Area Inspection reported that Education, Health and Care (EHC) plans, were too education focussed and did not include sufficient detail of health and social care needs (where these needs occurred). The action plan prepared, implemented and monitored was requested, to verify controls weaknesses in respect of health and social care had been addressed. To date Internal Audit has not received the information. The seven EHC plans reviewed were assessed as being heavily weighted on education. Therefore, the audit cannot provide assurance that the weakness identified on health and social care have been addressed. Annual review, Health and Social Care information Officers advised that over time details in the main body of the EHC plan information may be superseded as more relevant material becomes available. However, the Senior SEN Officer confirmed that Section K of</p>	2	30-Nov-21 Revised to 31-Jul-22	<p>The work to re-audit the same cases by SEND Officers took place. The purpose of the audit was to ascertain that EHC Plans contained sufficient health and care information in order to respond to the 2016 SEND Inspection letter that identified that they did not. The re-audit did identify greater evidence of health and social care input than had been identified by the SWAP audit but again, because of the small sample, it was not possible to gain sufficient assurance that relevant EHC Plans included sufficient health and care information. It has now been agreed by the Service Director that we will commission a SEND specialist consultant from West Sussex to audit a larger sample of recent cases to determine the degree to which the Ofsted/CQC recommendation had now been met. Similarly, a second recommendation had identified that EHC Plan objectives did not show a progression from school-age to adulthood that one might wish to see in the EHC Plans. Again, despite SEND Officers looking again at the original SWAP sample, we were not</p>	In progress	Head of Additional Needs

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	<p>the EHC plan template 'Advice and Information' should show all sources of both historical and current information.</p> <p>The audit showed all seven samples had gaps in reference to historic information under annual reviews, health and medical advice and social care advice, where activity would be expected annually. With incomplete information the most appropriate outcomes for adulthood may not be achieved. The output from this assessment is captured for each case under Appendix 2</p>			<p>able to obtain sufficient assurance and we have also commissioned West Sussex to conduct a separate audit of relevant cases with a large enough sample size to determine the degree of assurance.</p>		
<p>EHCP Preparation for Adulthood</p> <p><b><i>DUE IN PERIOD</i></b></p>	<p>Poor document management</p> <ul style="list-style-type: none"> <li>• NHS reference 6400390340 was to be included in the test sample, but the officer could not locate the EHC plans,</li> <li>• NHS reference 7013040258 was selected for inclusion in the test sample, but the original document had been overtyped. The officer looked for the original PDF, but this could not be located.</li> <li>• Two of the data sets - Children with Disabilities and the Education, Health and Care plan did not consistently state the NHS reference for the individual.</li> </ul> <p>The findings identified may have significant consequences on the quality of the service delivered, which could result in regulatory</p>	2	30-Nov-21 Revised to TBD	<p>The outcome of this finding is that the team will be starting work on improving the database and document management systems. Initial conversations have been commenced but will now need to be placed on hold as the SEND Green paper is proposing nationally supplied data systems.</p>	In progress	Head of Additional Needs

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	scrutiny. Quality assurance Internal Audit observed that there was inconsistency on what was recorded as a source document in Section K of the EHC Plan.					