

Audit and Quality Assurance

Appendix 12

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Introduction

Accountability is the obligation and responsibility placed upon schools to justify the expenditure of High Needs' Element 3 top up funding for CYP with SEND. This is in relation to the:

- Choice of intervention – what is the most appropriate targeted support to effectively meet a CYP's SEND needs?
- Quality of provision - how are schools monitoring and reviewing the delivery of targeted support?
- CYP's attainment – what impact has the targeted support had upon meeting both the academic and Preparing for Adulthood outcomes for the pupil?

Historically, whilst systems for accountability are in place regarding the attainment for all Leicester City pupils via School Improvement and Ofsted, there has never been a formal procedure for direct accountability of spend for CYP in receipt of top up funding. Under the present system, the process for requesting and securing funding does not require schools to demonstrate an impact, transparency of spend or accountability of value for money.

The High Needs spending review seeks to address this. The proposed change in funding proposes a process to hold schools to account for the stewardship of Element 3 spend.

Accountability – the Local Authority's (LA) expectation of schools

The onus is upon schools to ensure adherence to:

- Quality First Teaching and the Graduated Response.
- Leicester City's 'Delivering High Quality Inclusive Provision for SEND Pupils in Mainstream Schools: Best Endeavours and Reasonable Adjustments' (BERA Framework).

In addition to best practice pedagogy and working within legal duty's incumbent upon all schools, there is also the requirement for robust procedures for accountability to be in place.

There is an expectation that Senior Leadership Team (SLT) and Governors will have knowledge and oversight of the Element 3 top up spend and justify this with transparency and confidence within the school's procedures and documented policy.

The school's SEND Policy needs to highlight a stringent quality assurance process for SEND educational provision. This will need to take account of:

- the quality, effectiveness and utilisation of teaching assistants – recruitment and retention, training and CPD, deployment and monitoring.
- suitability of environment – opportunities for inclusion.
- interventions and/or resources selected to meet individual SEND needs.
- the requirement to demonstrate the impact of spend against CYP's outcomes and evidence value for money.

High Quality Teaching

High Quality Teaching is a personalised, inclusive pedagogy supported by the graduated approach - whole school processes for assessing, planning, implementing, monitoring and reviewing CYP's progress. As part of the graduated approach, a CYP receives quality first whole class teaching supplemented by bespoke interventions to meet their individual needs.

This is funded via Element 2 funding from the school's budget. Element 2 funding needs to be documented before an application for Element 3 top up funding is made. Schools will be expected to evidence Element 2 spend in detail. The 'assess, plan, do, review' cycle of the graduated approach for specific intervention programmes and provision, along with the accompanying outcomes, need to be submitted for an Element 3 application. If this evidence is insufficient, an application will be rejected at initial stages of request by the LA.

The LA will support schools via:

- SENDSS teachers' attendance at biannual Joint Planning Meetings hosted by the school. Advice and support will be given at both a strategic whole school and individual CYPs level. In addition to this, each school has a specialist SENDSS link teacher who will offer guidance to the SENCO.

- CPD for SENCOs. SENCOs can observe Element 3 application panels. Following an attendance, they may become part of the Element 3 panel.
- Training. Schools can access SENDSS training either by purchasing LA traded services or attending termly SENCO Network Briefing meetings.

Delivering High Quality Inclusive Provision for SEND Pupils in Mainstream Schools: Best Endeavours and Reasonable Adjustments (BERA Framework)

In addition to quality first teaching and the graduated approach Leicester City schools need to document implementation of the BERA Framework. This requires evidencing inclusive practice and policy, at both a whole school and individual CYP's level when requesting Element 3. It will ensure that schools meet their best endeavours/reasonable adjustments legal duties as part of Element 2 spend.

If an Element 3 application is rejected due to insufficient evidence of implementation of the BERA Framework, schools will be supported by the LA via generic training opportunities or bespoke advice and support.

Full details of the BERA Framework can be found on the [Local Offer](#).

Accountability – the role of the LA

The LA is responsible for ensuring that High Needs funding is spent with regularity and propriety, and for ensuring value for money is achieved. It is the responsibility of the LA to evidence value for money by making sure that they efficiently and effectively manage High Needs funding. The Inclusion and Quality Team has been created to ensure that the process of accountability is robust, and to support schools in achieving value for money spend on CYP with SEND.

The quality assurance remit of the team, whilst not exhaustive, includes:

- providing direct support to schools to achieve positive outcomes for CYP. This is available via direct support and training, either as part of the Element 3 application process or following a direct request from schools.
- the monitoring of outcomes for CYP with SEND in receipt of top up funding. This includes interim support for ensuring the success of the Element 3 spend.
- reviewing the type, quality and effectiveness of the provision. By having oversight of all Leicester schools' choice of provision and

resulting CYP's outcomes, the data can be utilized to inform wider LA best practice on inclusion.

- reporting. Quantitative and qualitative data will illustrate best practice and value for money interventions. This will improve inclusive practice and promote opportunities for quality mainstream inclusion.

Inclusive Practice and Accountability

Responding to stakeholders' comments in the Element 3 Consultation, the application process has been reviewed and amended in collaboration with SENCOs, CYP and parent/carers. An online application process has been commissioned by the LA replacing a previous paper-based application process.

For an application to progress to a multi-agency panel for consideration of an Element 3 top up award, schools will need to evidence:

- Element 2 spend of £6000.
- Whole school inclusion and meeting an individual CYP's needs - BERA.
- The voice of the CYP and parent/carer.
- Proposed provision spend and benchmarking outcomes.

Online application

Element 2

Schools will need to document Element 2 spend. Details of provision, resulting spend and impact are required.

BERA Framework

The online application process for Element 3 will introduce the implementation of the BERA Framework at two levels: whole school inclusive practice and individual CYP needs. These elements of BERA must be evidenced by the applicant at the initial stage of the application process. If this requirement is not met, the application will not proceed. It is expected that the consideration of BERA is assessed by schools as part of the Element 2 spend. Schools may make applications for Element 3 funding to support the BERA Framework.

If there are concerns that the provision for best endeavours, reasonable adjustments are not being provided by schools, the application will be rejected, and remedial action will be initiated in conjunction with the school. The remedial actions will have 3 objectives:

- To review the approach of implementing BERA both at a whole school and at an individual CYP level.
- Provide support/training to the school in the application of the BERA framework.
- To agree a monitoring framework for the successful completion of any agreed remedial action.

Both the Inclusion and Quality Team and wider SENDSS specialist teachers will support and advise schools to achieve this.

Schools will be requested to reassess their BERA implementation, and a further Element 3 application will only be considered once these parameters/ remedial actions have been successfully addressed and implemented.

CYP and Parent/Carer Voice

For an application to be processed, evidence is needed of the CYP and parent/carers awareness of the Element 3 application. As part of the Inclusion and Quality Team's Element 3 monitoring visits, interviews with the CYP will take place. As part of an annual audit, a sample of parent/carers views will be recorded.

Audit and Assurance

School visits called, monitoring audit reviews, will be carried out by members of the Inclusion and Quality Team in a sample of schools that have requested Element 3 funding. Evidence will be required to show what provision has been put in place, and an assessment will be made as to whether the expected outcomes were achieved. Thereafter, a report will conclude upon the findings of the review, along with recommendations for further action, where appropriate.

There will be a minimum of two audit review visits within the 12-month funding. The first audit review will be in the first half term, the second in the third half term, after the funding has been agreed. The final audit review will take place at the end of the funding period.

Sample schools will be selected for an audit review or end of funding report review based upon one or more the following criteria:

- total amount of funding allocated to the school.
- number of CYP on the differing bands.
- number of children with SEND.
- severity or complexity of SEND needs.
- SENDSS specialist teachers concerns over the choice and/or delivery of provision.
- concerns into SEND practice and provision raised by School Improvement Partners.
- Ofsted reports highlighting SEND practice and provision that requires improvement.

At the first audit review the Inclusion and Quality Team will:

- set up an initial meeting with the school SENCO and/or SLT to explain the audit review. Schools will be expected to evidence allocation and implementation of provision for the CYP.
- review BERA – this will include a review of whole school inclusion and the individual CYP's needs as evidenced in the application for Element 3 top up funding.
- review of the Element 2 spend as documented in the application.
- interview the CYP and/or teaching assistants to assess progress following implementation.
- work with the school/CYP to complete an appraisal report and to agree next stages where appropriate. (Appendices 18)

At the second audit review:

- the Inclusion and Quality Team or SENDSS specialist teachers will meet with schools and complete an appraisal report.
- review the provision that has been implemented and spend to date.
- benchmark interim outcomes against the proposed outcomes.
- interview the CYP and/or teaching assistants.
- discuss remedial/interim actions with the school, if required.
- agree an interim audit review before the end of the funding where appropriate.

At the end of the funding cycle, a final audit review by the Inclusion and Quality Team may take place. A minimum of 12 visits will take place in

schools. Schools will be selected at random, based upon the detail documented above or if concerns were raised at each of the audit review meetings.

This review consists of:

- requesting documents that evidence the outcomes for the CYP have been achieved.
- reviews the spend awarded in terms of accountability and value for money.
- interviewing the CYP for their view of the provision and spend.
- completing an end of funding review report.

Financial Remediation

In event of schools not being able to satisfactorily justify the failure of spend or outcomes for a CYP, remedial action will take place.

Following monitoring audit reviews and where funding has not been used for the purpose for which it was intended or outcomes not achieved, the Inclusion Quality Team will work with the school to remedy this.

This may include:

- Suggesting additional strategies/interventions.
- Signposting to other professionals.
- Extending the period that the funding can be used over; this will result in the school not receiving additional funding.

As a last resort, the Funding and Grants Manager will be contacted, and clawback of the funding allocated to the school will be initiated.