

Report to	Audit Committee
From	Sam McVaigh: Director of People & Inclusion
Risk Reference	CR14
Risk Description	Staff Safety & Wellbeing
Recommendation	For analysis and discussion

Context

This risk concerns the impact on service delivery due to staff sickness levels and the potential for both legal and financial consequences due to failure to comply with health and safety legislation. – These two areas are clearly different in many ways but are reflected together in a single risk under the shared theme of staff safety and wellbeing.

In late 2021 an audit of the Council's Health and Safety arrangements gave a 'limited' assurance opinion. Significant work has been undertaken following this audit to strengthen health and safety governance, assurance and culture with the associated audit recommendations now complete. This area, however, remains a key priority and a number of recent reportable health and safety incidents have highlighted the need for continued focus here.

The Council's sickness absence level as of January 2023 is an average of 13.92 days lost due to absence, per full time equivalent employee, in the proceeding 12 month period. This is significantly greater than the Corporate target of 9.85 days. 'Stress, Depression, Mental Health and Fatigue Symptoms' are the highest cause of absence. – An update on staff sickness absence was presented to the Council's Performance and Finance Scrutiny Sub Group in December and a copy of this report is appended below.

Key Potential Impacts

This risk currently has a score of 16, with a likelihood rating of 4 and impact rating of 4. – This is an increase of 1 point in the likelihood rating since the most recent review because of both the increase in sickness absence and the number and nature of recent health and safety incidents.

Current Controls – Sickness Absence

The report appended describes the current range of work ongoing in this area. In summary current controls include:

- A strong employee wellbeing programme with localised action informed by both sickness data and the staff Pulse Surveys
- Targeted work to address key sickness hotspots, particularly in the Operations and OCO Departments
- Management training through a new mandatory management development programme, launched in January of this year
- Improved data, reporting and management prompts for action through the use of the iTrent system
- Strong joint working with the Trade Unions

Planned Actions – Sickness Absence

Again, key future areas of work are set out in detail in the appended work but, in summary, include:

- A review of the Council's Occupational Health function (currently subject to consultation)
- A review of the Council's sickness absence policy
- Continued prioritisation through the 2023/24 Corporate Plan
- Further targeted work with hotspot areas
- Roll-out of a new management information dashboard
- Targeted work to promote positive attendance and to focus on compliance with the Return to Work process.

Current Controls – Health and Safety

Over the past year significant work has been undertaken to strengthen the Council's Health and Safety management infrastructure including:

- Approval of a new [corporate Health and Safety Policy](#)
- Re-establishment of a formal Health and Safety Joint Consultative Committee (JCC)
- Approval of an [annual Health and Safety report](#) via Cabinet
- A programme of quarterly health and safety performance reporting to the Council's Executive Team and Health and Safety JCC
- An annual 'risk assessment needs checker' process, to better understand service level risk profile, and resultant programme of deep-dive health and safety audits flowing from this
- Inclusion of health and safety as a core topic within the new mandatory management development programme.

Planned Actions – Health and Safety

Current planned actions to provide further assurance and reduce the risk profile here include:

- A commissioned external review of health and safety arrangements within the Operations Department, the area of greatest health and safety risk within the Council.
- A strengthened staff training approach including a new mandatory 'elearning' module for all staff and improved automated recording and reporting in relation to essential health and safety training
- Ongoing audit activity and a refresh of the annual 'risk assessment needs checker' process.

BRIEFING NOTE	
To:	Performance & Finance Scrutiny Sub-Group
From:	Sam McVaigh (Director of People and Inclusion) Simon Bagley (Head of HR)
Date:	15 th December 2022
Subject:	Sickness Absence

Purpose

At its meeting on 10th March, the Performance & Finance Scrutiny Sub-Group discussed the latest available information on staff sickness absence and work to promote positive attendance and decrease absence levels. This note provides an update on absence levels and responds to feedback provided at the March meeting.

Background Data

As of the end of October 2022 the Council (excluding schools and Casuals) has an annual absence rate of 14.41 days per FTE. This is an increase on the results for the same month in each of the last two years (13.92 days in October 21 and 13.34 days in October 2020). The figure remains significantly greater than our corporate target of 9.85 days, as well as external benchmarks. The figure is, however, a marginal reduction on the last measure reported to this group in March, based on sickness to the end of January 2022, of 14.94 days per FTE on average. Because the standard absence measure takes account of sickness over the preceding 12 months, the impact of Covid, and particularly the Omicrom variant in early 2022, remain a significant factor in our absence levels.

In April 2022 the Council activated manager self-service reporting functionality in relation to sickness through iTrent. This has significantly improved the accuracy of our data and our ability to ensure all cases are properly logged and managed. This may, in part, account for an element of the reported increase in some areas. As well as self-service reporting this new functionality includes regular email prompts to both managers and HR around the absence management process and also access to real-time data on absence cases and associated triggers. One specific area which this new functionality provides both management prompts in relation to, and the ability to report on, is the completion (and uploading) of Return to Work conversations. Based on absence concluding since 1st April 2022 only 24% of cases have completed Return to Work documentation recorded against them. – Given the

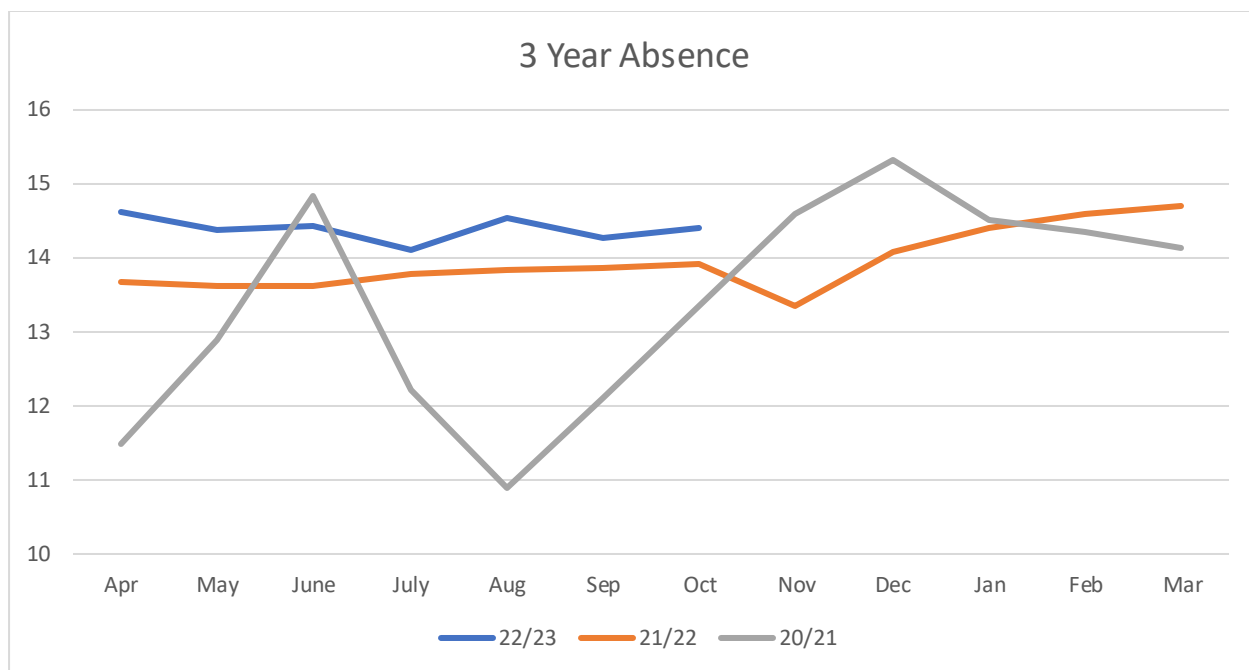
evidenced importance of these conversations in reducing absence levels an increased emphasis will be placed on ensuring completion and sharing data on non-compliance with senior managers.

Reliable benchmarking data on sickness absence is difficult to access at present, in part because of the Covid impact. However:

- Due to the impact of the COVID-19 pandemic across UK workplaces, the huge disruption caused to employee attendance means this is the first time in 20 years that the CIPD's Public Sector Health and Wellbeing at Work survey has been unable to provide a reliable sickness absence rate to benchmark against. However, in 2020 they reported an average absence rate across the sector of 8 days.
- The latest Greater Manchester benchmarking information is currently being collected by North West Employers Organisation, this will be the first time information has been collated for a number of years. An indication of levels elsewhere can, perhaps, be taken from a recent Manchester City Council scrutiny report which shows an average of 14.24 days per FTE lost reducing to 12.32 days once Covid related absence is excluded. These levels are broadly comparable to those of Bury Council.

The table and graph below show the three year trend of sickness absence at a Council level. The graph shows a significant level of volatility in our absence trend in 2020/21, which can be attributed to the progression of the Covid pandemic. The last 2 years demonstrate a reasonably static/consistent level of sickness absence, albeit at a higher level than anticipated. This can be attributed to a number of factors, but specifically; learning to live with Covid, specific long term absence cases and the availability of more accurate data (through better recording and greater ability to analyse data).

Month	Apr	May	June	July	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar
22/23	14.63	14.37	14.44	14.12	14.53	14.26	14.41					
21/22	13.67	13.61	13.62	13.78	13.84	13.87	13.92	13.34	14.08	14.40	14.60	14.69
20/21	11.50	12.90	14.84	12.21	10.89	12.11	13.34	14.59	15.31	14.51	14.34	14.14



BVPI for Council Departments: 12 Month Comparison

	Average Days lost per FTE	
	12 months to 30 October 2022	12 months to 30 October 2021
Business, Growth & Infrastructure	7.39 (-5.01)	12.40
Children & Young People	10.40 (+0.19)	10.21
Corporate Core	13.66 (+5.05)	8.61
Finance	6.02 (+1.48)	4.54
One Commissioning Organisation	20.92 (-0.96)	21.88
Operations	16.31 (-0.05)	16.36
Sum:	14.41	13.92

Whilst the Council's absence rate is high, there is a significant variation between departments with only two of the six areas falling within the corporate target in the latest reporting month.

When compared against the same month in 2021, whilst there has been an increase of almost half a day absence per FTE across the Council, there have been notable variances across departments.

The data demonstrates a slight improvement across the OCO and a significant improvement within BGI.

The Children & Young People and Operations departments figures are relatively static, but there has been a negative downturn within Corporate Core and Finance.

BVPI Excluding Covid Related Absences

	Average Days lost per FTE (Excluding Covid related absence)	
	12 months to 30 October 2022	12 months to 30 October 2021
Department for Business, Growth & Infrastructure	6.70 (-4.8)	11.50
Department for Children & Young People	9.16 (+0.19)	8.97
Department for Corporate Core Services	12.52 (+5.26)	7.26
Department for Finance	5.35 (+1.31)	4.04
Department for One Commissioning Organisation	16.87 (-1.31)	18.18
Department for Operations	14.03 (-1)	15.03
Sum:	12.37	12.24

The above figures have been calculated in the same way but exclude any absences related to Covid. This demonstrates an overall reduction of an average 2.04 days absent per FTE once Covid related absence is excluded. Whilst there is a downward trend for each department, the most significant change is within the Department for One Commissioning Organisation, indicating a reduction of 4.05 days per FTE. This downward trend is perhaps not surprising given the nature of work in this department.

The removal of Covid related absence indicates that, whilst Operations and the OCO remain the areas of greatest sickness absence, a significant underlying improvement can be demonstrated. However, the increase in sickness across the Corporate Core is emphasised demonstrating that this is not Covid related.

Absence by Reason (Top 3)

(12 month period up to 30 October 2022)

Absence Reason	Count of Absences	FTE Days lost Number	Percentage:
Sickness-Stress, Depression, Mental Health, Fatigue Symptoms	249	7201.40	25.46%
Sickness-Other	399	3995.95	14.13%
Sickness-Other musculo-skeletal problems	192	3370.99	11.92%

The three categories above account for a total of 14,568.34 days lost due to sickness absence out of the total of 28283.55 days lost across the Council between October 2021 and October 2022.

Covid related absence represents the fourth highest reason for sickness over this period (3170.87 days). If we were to include this 62.72% if all days lost would be covered by these reasons.

In total, within the reference period, there were 21 reasons for absence, however it is evident that the main area of focus and planned actions must centre around the top three categories. This is typical of the wider employment sector, with the CIPD Health and Wellbeing at Work Survey 2021 listed the top 3 reasons for absence as:

- Mental Ill Health
- Musculo Skeletal
- Stress

Departmentally, the top three reasons for absence are as follows:

	1	2	3
BGI	Musculo Skeletal	Stress, Depression, Mental Health, Fatigue Symptoms	Other
Children & Young People	Stress, Depression, Mental Health, Fatigue Symptoms	Musculo skeletal	Disability
Corporate Core	Stress, Depression,	Other	Musculo Skeletal

	Mental Health, Fatigue Symptoms		
Finance	Stress, Depression, Mental Health, Fatigue Symptoms	Other	Neurological
One Commissioning Organisation	Other	Stress, Depression, Mental Health, Fatigue Symptoms	Chest/Respiratory
Operations	Musculo Skeletal	Stress, Depression, Mental Health, Fatigue Symptoms	Stomach, Liver, Kidney & Digestive

The category “other” is used when it is difficult to pin down the actual nature of a reason for absence. However, the data provided indicates that “other” is in the top 3 reasons for absence across the Council and is not helpful in trying to identify trends or ways of reducing absence if the underlying reason for absence is essentially unknown.

Work is planned for the coming months with those service areas making most use of this category to understand the nature of these cases and identify if improved manager training or a revision to our absence categories is needed to improve reporting.

Estimated Cost of Sickness Absence

At this group’s March meeting Members asked for an estimated (notional) cost of sickness absence to the Council. Based on the median salary of SCP 22 (Grade 9) and the 28,283.55 days lost in the last 12 months, this cost would be in the region of £4.289m.

It is important to point out that this is not additional expenditure on top of the salary budget, but it is an indicative figure of salary payments made against days where no work was undertaken due to ill health.

In most cases, work will not have been performed or will have been completed by other employees at no extra cost. However, in some front-line roles, particularly within the OCO and Operations departments, additional costs may have been incurred through covering roles by either overtime or the engagement of agency workers.

Promoting positive attendance

At this group's March meeting Members asked for information on positive attendance and for consideration to be given as to how this is recognised. During the last 12 months 1,153 employees (47% of the workforce) have seen no recorded period of sickness absence. – Careful thought is being given as to how this is recognised given the complex potential reasons for sickness and a risk of creating a sense of negativity, particularly in those areas where staff are required to be absent when experiencing even the mildest symptoms of infection.

Departmental Analysis

An overview of key hotspots, current case volumes and targeted activity by Department is set out below. Within this section the terms 'long term' and 'short term' are used. These are defined as:

- Long Term – 20+days absent
- Short Term – between 6 and 20 days absent

One Commissioning Organisation

OCO	FTE EMPLOYEES	AVERAGE FTE DAYS LOST
Choices for Living Well	103.65	34.65
Sheltered Services	6.69	21.52
Integrated Neighbourhood Teams (All Areas)	35.04	18.67

Choices for Living well remains a priority area for action. 10 live long term absence cases are currently being managed. In addition to this, short term sporadic absence is a challenge in this service with 271 cases in the reference period 1/11/21-30/10/22.

It is worth noting that, in line with infection prevention guidance, front line employees within the OCO, such as those in Choices for Living Well, need to remain absent for work for 48 hours following the end of sickness symptoms (in cases of illness where infection may be passed on). Strict absence expectations also remain in place for this service in relation to Covid, reflective of national guidance for adult social care settings.

The Choices for Living Well Service has an ageing workforce which is an important consideration when considering absence here, particularly in relation to musculoskeletal issues. The Department has recently retendered its core training in relation to moving and handling, supporting the prevention of injury to staff due to ineffective methods of moving service users residing within Killelea.

Sheltered Services rate of absence remain high. There was a total of 12 long term absences across Sheltered Services and 33 short term. There are no long-term absences live at the moment within the service.

The Integrated Neighbourhood Teams remain a significant area of concern. Analysis indicates that INT Prestwich has the lowest BVPI of 4.87, however the other INT's all have BVPI's above the corporate target of 9.85, ranging from 16.24 in INT West to 32.05 INT Whitefield. There was a total of 10 long term absences managed throughout the reference period and 40 short term absences (inclusive of covid related absences).

Additionally, the Older People Mental Health Team is a service of a high-pressure nature and has a BVPI of 30.57. There have been 2 cases of long-term absence and 10 short term absence across the reference period.

The Hospital Team is also an extremely high-pressure service area to work within. Displaying a BVPI of 22.94, over the past 12 months there have been 2 long term absence cases, 1 of which has now concluded with the other being actively managed. The Health & Social Care sector predominantly has higher sickness due to the nature of the roles. Nationally sickness absence has increased for Health & Social Care roles since the pandemic.

Operations

Operations	FTE EMPLOYEES	AVERAGE FTE DAYS LOST
Lifestyle Service	9.37	43.92
Street Cleansing	26.66	33.32
Waste Management & Transport	95.72	26.02

The Lifestyle Service has a high BVPI of 43.92 and has had 4 long term absence cases, and 9 short term absences over the past year. 2 of the long-term cases have been resolved although 2 remain live and are currently being actively managed.

The Street Cleansing Team has had 12 live long term absence case within the reference period, although all have now been resolved. There have however been 27 short term absences, with 21 of the 26.66 FTE team being absent from work due to illness at one point or other. This would indicate that, unusually, it is the short-term sickness absence management that will require focus in the future to ensure that the BVPI is reduced appropriately.

Waste Management & Transport currently shows a BVPI of 26.02. Within Waste Management, there have been 8 instances of long-term sickness absence and 129 cases of short term sickness absence. There were 3 open long-term absences under case management within the reference period, although 1 has now returned, with arrangements in place to facilitate a return of another in December. One member of staff remains absent on long term absence and is being actively managed.

Transport taken as an individual service has a lower BVPI of 11.35, with 13 short term and 2 long term absences within the reference period, which are all now closed.

Waste Management & Transport (particularly the Waste Management Team) accounted for a total of 3292.22 days absent (31.37%) of the total days absent within the department (as detailed above).

Commercial Services (Catering and Cleaning services) has a BVPI of 16.78, resulting through 453 short term and 87 long term absences within the reference period.

A newly appointed Senior HR Business Partner and HR Business Partner commenced in post to support Operations in November. Strengthening absence management arrangements will be a key priority for this team.

Corporate Core

Corporate core	FTE
Emergency Response & Resilience	47.51
Contact Centre	23.75
Business Support Team	9.65

The pronounced increase in absence levels in the core can be attributed to two broad factors:

1. A small number of very long-term sickness cases
2. The transfer of circa. 100 staff into the Department from April as part of the Business and Executive Support review, including a number with challenging sickness records which are now being managed.

With regards to sickness absence in Corporate Core, from the report at the end of October, 11 people were off work due to long term absence.

Of these 11 people there are 3 individuals who have been off for 49 days or less and 8 have been off for more than 50 days. Because the majority of staff have been off for 50 days or more, this has significantly increased the average number of days lost per person.

The Emergency Response & Resilience team has the highest BVPI figure across the department at 47.51. The team comprises 24.69 FTE employees and has lost a total of 1173.16 days due to absence across the reference period, which equates to 27.25% of the total departmental days lost.

The high figure is because they currently have 3 long term absentees, and all have been off for more than 50 days. 1 staff member has been off for 15 months but is actively being redeployed and there are currently 3 roles that are being explored as

suitable alternatives. 2 staff members remaining absent and are due back to work at some point in December, although a specific date has not yet been agreed.

Business Support, a newly formed team, has a number of absences, which are as a result of a number of staff now being managed and challenged regarding their standard of performance and behaviours which have previously gone unmanaged.

The Contact Centre has a BVPI of 23.75. Comprising almost 26 employees, there have been 13 long term absences within the 12 month period, with 616 working days lost to absence. However, all cases have now been closed and return to works have been facilitated.

Children & Young People

Sickness within the department is relatively low and stable compared to other operational departments.

Regular HR monitoring and review of all sicknesses reaching 20 days takes place, with prompt follow up action.

Regular meetings of the "Voice of the Workforce Group" allow senior management to hear any concerns from the workforce, including those relating to wellbeing, which they are able to address.

A revised service structure is currently being implemented, providing for higher levels of management support / lower levels of supervision ratio for frontline staff in children's social care, ensuring higher quality supervision and supporting employee wellbeing.

In terms of caseloads, the department is working towards implementing maximum caseload limits for social workers (target of 15) to reduce risk of stress / fatigue.

There is a focus on recruitment to substantive vacancies, delivering a stable workforce and sufficient capacity to ensure employees have a reasonable workload.

Finance

Sickness across the Finance department is consistently low.

Regular HR monitoring and review of all sicknesses reaching 20 days takes place, with prompt follow up action with the managers concerned.

A new departmental structure is currently being implemented which has led to some consternation and a rise in absence in particular areas across the service, however this is being addressed through both the restructure exercise and the absence management process.

BGI

Sickness absence across the department has reduced significantly from the same period last year.

Regular HR monitoring and review of all sicknesses reaching 20 days takes place, with prompt follow up action.

The 'Better BGI' forums allow senior management to hear concerns and ideas from the staff.

Actions Underway

The information above focuses largely on current absence data. Whilst excluding Covid related absence demonstrates a circa. 4 day reduction in overall absence levels, irrespective of this, absence levels remain significantly above the corporate target and have increased by 0.13 days based on a year-to-year comparison.

The table below sets out an update on the range of actions currently being progressed to support a sustainable reduction in sickness absence levels. These actions are being progressed as high priority actions as part of a dedicated Workforce Performance Improvement Project which forms a core element of the 'Let's Do It Well' Transformation Programme. The aim is to support a reduction in absence levels to meet, or exceed, the corporate target of 9.85 working days lost per full time employee:

ACTION	DETAIL
Data Dashboards – Phase 1	<p>As part of the ongoing iTrent programme and the roll out of additional functionality, managers now have access to real time dashboards providing a range of HR data metrics, including sickness absence. 70 managers recently attended training sessions to launch the new functionality which will enable tighter oversight of absence levels and triggers across departments.</p> <p>Additionally, HRBP's now have access to better quality and more detailed data to identify hot spots and support managers in the management of sickness absence. A standard dashboard is currently in development which will be refreshed and shared with departmental management teams on a monthly basis through the Senior HRBP's. It will be rolled out to departments early in the new year.</p>
Promotion of Employee Wellbeing	<p>Employee wellbeing remains a significant area of focus and a comprehensive offer is in place which includes:</p> <ul style="list-style-type: none"> - Healthy workplace including our Employee Assistance Programme, Occupational Health service and specific guidance and support in areas such as neurodiversity and the menopause - Healthy and active lifestyle including discounted Bury Leisure membership, cycle to work scheme, referrals to Bury Live Well Service/BEATS

	<ul style="list-style-type: none"> - Healthy finances including our financial support for employees offer, Money Helper and the Manchester Credit Union - Healthy minds including the Access to Work Mental Health Service and free counselling/CBT via the EAP <p>Since the last report a number of strands of action have been progressed as part of our employee wellbeing programme including:</p> <ul style="list-style-type: none"> • A new comprehensive financial wellbeing offer, aligned with the Council’s external facing cost-of-living support package. This has included open sessions for staff and proactive on-site support in a number of locations • A series of in-person wellbeing events to support wellbeing and engagement across teams, with events recently facilitated for the Corporate Core, Finance and BGI, responding directly to feedback through the Pulse Survey • A pilot, targeted, training offer for front-line managers in the OCO to better equip them to manage mental wellbeing in the workplace. <p>A key next phase in work to strengthen our wellbeing approach will be a full review of the Council’s Occupational Health function which will be concluded by the end of this financial year.</p>
<p>Programme of 1:1 meetings with service managers</p>	<p>HR Business Partners (HRBPs) are continuing to undertake a programme of 1:1 meetings with service managers on a regular basis, using sickness absence reports to jointly analyse live cases, identify hot spots and agree solutions/actions to address them. Through this approach, 71 long terms cases have been successfully managed and returned to work since April 2022. HRBP’s are continuing to ensure sickness absence is a top priority for managers through regular management team meetings. Drop in sessions where managers can raise any specific case issues and ask for advice concerning managing absence have also been delivered in service areas with a high sickness prevalence e.g. Killelea and Bradley Fold depot. The HR Team is committed to developing and rolling out a wider programme of cross-departmental drop in sessions around management of attendance from the new year.</p>
<p>Policy Review</p>	<p>Feedback indicates that there is a clear opportunity to simplify the existing sickness absence policy to enable swifter and easier management action. A policy review and revision is underway and a revised sickness absence policy should be due for consideration by the Employment Panel early in the new financial year.</p>

iTrent development	<p>The “switching on” of the absence management module in iTrent from April has improved the governance and management of sickness absence, with the automation of processes aligned to the policy, saving management time and providing real time, accurate data.</p> <p>Additionally, managers now receive automatic email prompts throughout all stages of the absence process to support and enable more effective management of cases.</p> <p>The improved iTrent functionality also provides us with added confidence that all cases of sickness absence are now being managed appropriately.</p>
Management Training	<p>A new mandatory Management Development Programme has been commissioned and is currently in the detailed design stage. The programme will upskill managers in a wide range of areas, including managing employee attendance, the importance of health and wellbeing and wider capabilities to engage and manage the workforce. The programme is to begin roll out in Jan 23 and sickness absence levels will be used as a measure to both identify target managers for the initial cohorts of the programme and measure its effectiveness</p>

Report to	Audit Committee
From	Director of Education and Skills
Risk Reference	CR21
Risk Description	Project Safety Valve
Recommendation	For discussion

Key Potential Impacts

- Risk of Bury Council being withdrawn from Project Safety Valve (PSV) due to increased activity and therefore not reducing the deficit on the DSG (Dedicated Schools Grant) resulting in a loss of in excess of £10M of funding.
- Bury Council does not meet the 5 conditions as set out in the PSV agreement which would result in additional payments being withheld or withdrawn and Reserves would be needed to be used to pay DSG deficit.
- Increase in levels of need post Covid and 45% increase in EHCP assessments mean that finance targets in the eradication of the deficit are not met due to the continued lack of SEND sufficiency in Bury and the continued need for out of borough places.
- The latest PSV forecast is that expenditure on the dedicated schools grant high needs block (DSG HNB) is going to be higher in the 2022/23 financial year than what was previously predicted in the forecast submitted in June, as a result of increasing demand which has significantly increased reliance on independent schools.

We remain focused on the original conditions of Project Safety Valve, as agreed with the Department for Education. Despite positive service improvements, there has been an increase in out of borough placements and EHCPs in mainstream schools. These have resulted in significant challenges for our deficit reduction plan.

Current controls

At the end of February 2023, full-time internal project management capacity was secured to support delivery of PSV. This increased capacity will enable the development and monitoring of the plans to improve service provision, increase sufficiency and reduce the deficit. Governance of the programme is currently being strengthened to focus on progress, risks and issues. Weekly meetings with finance mean that we understand the impact this has on the deficit.

Significant progress has been made with improving the EHCP process and working with parents and Bury2gether to continue to deliver an improved SEND service in Bury. An EHCP Team Manager started in August 2022 and the team has remained stable. This has enabled a greater focus on quality and co-production. Weekly reporting allows for a better understanding of the trajectory of demand to plan resources more effectively to deliver quality plans in a timely manner. The team have mapped out work and robust tracking has ensured improved compliance.

The proposed restructure of Children's Services Education and Early Help will support PSV by enabling improved and focused leadership and management, alongside sufficient capacity to support effective delivery of services. Commissioning expertise has been identified within the proposed restructure which will ensure we obtain value for money on out of borough placements.

In addition to this, significant work has been undertaken to identify the amount of school surplus balance clawback we can expect from Spring Lane and Millwood schools. The finance department has been instructed to proceed with this clawback, totalling £655,786.

Work to model top-ups to match neighbouring Local Authorities has also taken place, as has work to refresh banding descriptors. This will support the moderation of pupils at Millwood and Elms Bank schools, due to take place in March 2023. Moderation will ensure that special schools are funded appropriately for their pupils. Since the banding scheme was introduced in 2019, schools have allocated pupils to bands, and this has not been externally verified. The result has been significant upward drift over the past few years.

Significant progress has been made with the creation of Resource Provision places in primary and secondary schools across Bury. These places will specialise in Social Emotional and Mental Health (SEMH), Autism Spectrum Conditions (ASC) and Speech, Language and Communication Needs (SLCN) and will be phased in from September 2023 to match need. These places, alongside the creation of the Free Special Schools (2 agreed, 1 awaiting outcome of the application), will mean

we will be less reliant on commissioning Independent Non-Maintained provision to meet the needs of pupils. This will have a real impact on the deficit plan as the cost of placing pupils in Independent Non-Maintained Schools is high.

Planned actions

Work is taking place to develop the finance deficit project plan. Once complete, there will be a plan in place to review how we currently commission out of borough placements, moving to a model where we can be assured of value for money. The same process will also be applied to Alternative Provision and the Pupil Referral Unit. This will ensure we pay for provision which is based on need at rates comparable to other Local Authorities.

Moderation of Millwood and Elms Bank special schools will take place in March 2023. We have secured Alistair Crawford, Director of SEND & Inclusion for St Martin's and St Andrew's Schools in Derby to lead the moderation exercise. Alistair is a member of the regional team for Whole School SEND (EMSYH), Co-Chair of the National Network of Specialist Provision (NNSP) and is currently the Specialist lead for Oak National Academy. Other internal and external colleagues will support Alistair with the process. Millwood and Elms Bank are fully engaged with the exercise.

Bury's SEND Graduated Approach Toolkit has been created and will now be embedded in the Local Offer. A task and finish group will begin to meet monthly at the beginning of March 2023 to roll out training across the SENCO network. This will be a rolling training programme, with the first set completed by the end of October 2023. The Graduated Approach will also be embedded in the induction of all education staff. To support delivery of the approach, Barnardo's has been commissioned to create a volunteer network in Bury to signpost professionals to the support available. This is an important step as the Approach is embedded and pupils are supported. Expected outcomes are:

- An increase in the number of pupils receiving SEN support.
- A decrease in the number of requests for EHCPs.

We expect to see a difference in the number of pupils receiving SEN support by July 2023.

The DfE are leading the establishment of the Free Special Schools in Bury. There is a basic timeline in place but there is a requirement for the DfE to create a project group and formalise key milestones. This will enable us to work through any local issues regarding legal, land and property, planning and highways. A formal ask will be made of the DfE regarding the project group because progress with the Free Special Schools impacts directly on sufficiency and our ability to reduce out of borough placements.

A meeting with colleagues from Slough Council on the 6th March 2023 will enable us to identify further opportunities to reduce the deficit on the DSG.