



**EQIA Submission Draft Working Template**

If required, this template is for use prior to completing your EQIA Submission in the EQIA App. You can use it to understand what information is needed beforehand to complete an EQIA submission online, and also as a way to collaborate with others who may be involved with the EQIA.  
Note: You can upload this into the App when complete if it contains more detailed information than the App asks for and you wish to retain this detail.

**Section A**

**1. Name of Activity (EQIA Title):**

The Locality Model for Special Educational Needs (SEN) Inclusion in Kent

**2. Directorate**

Children Young People and Education (CYPE)

**3. Responsible Service/Division**

Education and SEN

**Accountability and Responsibility**

**4. Officer completing EQIA**

Note: This should be the name of the officer who will be submitting the EQIA onto the App.

Rachel Baker – Transformation Project Manager, CYPE

**5. Head of Service**

Note: This should be the Head of Service who will be approving your submitted EQIA.

Siobhan Price – Education Officer, Mainstream Inclusion, CYPE

**6. Director of Service**

Note: This should be the name of your responsible director.

Christine McInnes – Director of Education and SEN, CYPE

**The type of Activity you are undertaking**

**7. What type of activity are you undertaking?**

Service Change – *operational changes in the way we deliver the service to people.* Answer Yes/No

Yes

Service Redesign – *restructure, new operating model or changes to ways of working.* Answer Yes/No

Yes

Project/Programme – *includes limited delivery of change activity, including partnership projects, external funding projects and capital projects.* Answer Yes/No

Yes

Commissioning/Procurement – *means commissioning activity which requires commercial judgement.* Answer Yes/No

No

Strategy /Policy – *includes review, refresh or creating a new document.* Answer Yes/No

Yes

Other – Please add details of any other activity type here.

None

**8. Aims and Objectives and Equality Recommendations – Note: You will be asked to give a brief description of the aims and objectives of your activity in this section of the App, along with the Equality recommendations. You may use this section to also add any context you feel may be required.**

Kent County Council (KCC) are looking to adopt and implement the delivery structures developed in collaboration with representative partners, so that they will support increased inclusion in mainstream schools for children and young people with Special Educational Needs (SEN).

KCC’s Countywide Approach to Inclusive Education (CATIE) Strategy 2023-28 established our collective ambitions for children, young people, and their families in Kent. Working together in a collaborative, sustainable system to ensure equity of education means all children feel they belong, are respected, and valued as individuals, and are fully supported to achieve their best.

The CATIE is mentioned within the DfE’s Safety Valve Agreement with Kent in that it will “develop a school/area-led approach to [...] SEN support services (Locality Based Resources), to better respond to the needs of children and young people with Special Educational Needs and Disability (SEND)”.

The Locality Model is an intrinsic step towards KCC’s commitment to delivering the priorities of CATIE and delivering on their responsibilities to implement the Designated Schools Grant management plan, as outlined in the DfE Safety Valve Agreement. The Locality Model covers the age ranges of 5 to 16 years in mainstream primary and secondary schools, and for children attending sixth form in state funded schools. KCC are proposing to continue with current processes for early years and other post-16 institutions at this stage.

KCC consulted with Kent Schools, residents, stakeholders, and service users on the plans for reform. As part of this consultation, KCC invited views on its assessment of the potential equality impacts of the proposal. KCC has considered

the views expressed by consultees and revised this impact assessment prior to making any final recommendation.

The purpose of this Equality Impact Assessment is to help KCC assess the potential impact on persons with different protected characteristics. In undertaking this assessment, KCC has had regard to the need to: (i) eliminate discrimination; (ii) advance the equality of opportunity; and (iii) foster good relations between persons who share a relevant protected characteristic and those who do not, in the exercise of our public functions.

### Section B – Evidence

*Note: For questions 9, 10 & 11 at least one of these must be a 'Yes'. You can continue working on the EQIA in the App, but you will not be able to submit it for approval without this information.*

9. Do you have data related to the protected groups of the people impacted by this activity? *Answer: Yes/No*

Yes

10. Is it possible to get the data in a timely and cost effective way? *Answer: Yes/No*

Yes

11. Is there national evidence/data that you can use? *Answer: Yes/No*

Yes

12. Have you consulted with Stakeholders?

*Answer: Yes/No*

*Stakeholders are those who have a stake or interest in your project which could be residents, service users, staff, members, statutory and other organisations, VCSE partners etc.*

Yes

13. Who have you involved, consulted and engaged with?

*Please give details in the box provided. This may be details of those you have already involved, consulted and engaged with or who you intend to do so with in the future. If the answer to question 12 is 'No', please explain why.*

KCC has engaged with stakeholders to support in creating the proposals, including service providers, education settings, council members, external advisors, and Kent PACT (Parent and Carers Together) forum. Full details can be found in appendix one of the consultation document, located by visiting [www.kent.gov.uk/localitymodel](http://www.kent.gov.uk/localitymodel)

Engagement activities were also undertaken in the creation of the CATIE in late 2020 and early 2021. Schools, parents/carers, and other stakeholders were involved in the discussions and decisions over content within CATIE via different working groups. A HNF Subgroup (which reports directly into the Schools Funding Forum) was convened and now meets monthly, consisting of LA and school personnel across various departments, school phases, and types of setting.

KCC carried out pre-consultation engagement, across all 12 Districts with education settings and relevant professionals, with representative service user forums, and strategic and operational groups, in October and November 2023. Between the 29 November 2023 and 24 January 2024 KCC conducted a wide-ranging public consultation on the proposals their families. During this time more engagement was undertaken with professional partners and with families and service users through school engagement and virtual events.

14. Has there been a previous equality analysis (EQIA) in the last 3 years? *Answer: Yes/No*

Yes, for the CATIE Strategy, this work sits within the remit of CATIE. There was an EqIA for the consultation on the proposed Locality Model. This updated EqIA focuses on the feedback received from this consultation.

15. Do you have evidence/data that can help you understand the potential impact of your activity?

*Answer: Yes/No*

Yes

Uploading Evidence/Data/related information into the App

*Note: At this point, you will be asked to upload the evidence/ data and related information that you feel should sit alongside the EQIA that can help understand the potential impact of your activity. Please ensure that you have this information to upload as the Equality analysis cannot be sent for approval without this.*

Dashboard link / KPI table from CATIE

### Section C – Impact

16. Who may be impacted by the activity? *Select all that apply.*

Service users/clients - *Answer: Yes/No*

Yes

Residents/Communities/Citizens - *Answer: Yes/No*

Yes

Staff/Volunteers - *Answer: Yes/No*

Yes

17. Are there any positive impacts for all or any of the protected groups as a result of the activity that you are doing?

*Answer: Yes/No*

Yes

18. Please give details of Positive Impacts

- Children and young people experience a high quality, inclusive education within the most appropriate setting to meet their needs.
- Children and young people with SEN have their needs identified early and receive appropriate levels of support that enables them to engage and make appropriate progress in their learning.
- Children and young people with SEN achieve their potential academically, gaining skills, knowledge, and confidence to move to the next stage of learning and independence with success.
- Children and young people with SEN receive timely and holistic support from education and wider services that responds to their health, wellbeing or social care needs and supports their inclusion in education.
- Children and young people experience positive transitions between key stages of education and settings as well as

- f) wider life events and are prepared to live as independently as possible
  - f) Parents and carers are confident that their child’s school or setting has the knowledge, skills, and confidence to meet their needs.
  - g) Parents/carers have confidence that their child or young person’s broader health, wellbeing and social care needs are being supported.
  - h) Schools meet the needs of children and young people with SEN and strengthen inclusive practice through access to a graduated core offer of training, development, and peer review activities.
  - i) Staff in mainstream schools have improved knowledge, skills, and confidence in responding to the needs of children and young people with SEN through:
    - a. access to high-quality information, advice and support from multi-agency professionals and specialist teachers.
    - b. streamlined and effective locality structures through which to share advice, best practice and information as well as accessing wider support for individual children and young people with SEN.
    - c. flexible locality resources, in the form of financial and practical support.
  - j) Support delivered within and through schools is connected to a wider, integrated offer from partner services, which support the child or young person’s broader social, emotional, and physical wellbeing. Schools can draw upon, and work in partnership with, a wider range of professionals to ensure a holistic response to meeting the needs of children and young people.
  - k) Schools are able facilitate smooth and successful transitions through effective local collaboration, built upon:
    - a. a shared understanding of best practice in relation to transition.
    - b. tools and approaches to support planning for individual children and young people including preparing for adulthood.
    - c. access to resources and opportunities for transition activities.
- Through strengthening outcomes at an individual and school-level, we will see longer-term progress towards the following countywide outcomes:
- l) A greater proportion of children and young people with SEN access a high-quality, inclusive education within a mainstream setting (where this is appropriate to their needs).

**Negative Impacts and Mitigating Actions**  
 The questions in this section help to think through positive and negative impacts for people affected by your activity. Please use the Evidence you have referred to in Section B and explain the data as part of your answer.

**19. Negative Impacts and Mitigating actions for Age**

**a) Are there negative impacts for Age? Answer: Yes/No**  
 (If yes, please also complete sections b, c, and d).

Yes

**b) Details of Negative Impacts for Age**

School aged children (5–16-year-olds) will be disproportionately impacted by the proposals. Funding and support may change for them under the new system. The service that children, young people and their families receive may be delivered in a different way, for example, by a different provider, in a group rather than individual setting, or at a different location. Children aged 5 to 16 may have their current individual funding changed and delivered in a new way under the new process; the focus will be on collective action and support, delivered in a way that makes best use of local resources. These proposals do not make changes to the Special Educational Needs Inclusion Fund (SENIF) for Early Years (0 to 4 years), or to Post-16 funding (16 years and upwards). Consultation responses showed some concern the model does not cover 0–4-year-olds and over 16’s not attending sixth form in state funded schools, with 8 items of age-related feedback. Including the following comments: ‘excluding under 5s is a huge negative impact for this group of children’, ‘this does not meet either the SEND code of practice or the Equality act’ and ‘ Not covering pre-school children, post 16...in the model is not equitable and meeting the act’.

**c) Mitigating Actions for Age**

If the proposed Locality Model proceeds, 5-16-year-olds will be supported by a new model of working that uses local resources and collaborations in local clusters to best support all children within their locality. There will be a carefully planned transition period, between the current and any new model. It will be within this transition period that KCC and schools will plan for and communicate any changes to be made to a child’s provision. The proposed model will enable greater inclusion of all students in mainstream settings, meaning that they can attend schools locally (reduced travel time) and build links, friendships and integrate into their local community. No child that needs additional support will go without it, the funding will still be there, but it will be allocated differently, giving more influence to the schools who know and work with the child and their family. SENIF will continue to be delivered in the same way, if it needs to be reviewed it will be carried out independent of this proposal. Post-16 will be delivered in the same way as it is currently. The rationale for focusing on a Locality Model for 5-16-year-olds, rather than all age groups, was to change the system first where it will have the most direct positive impact for children, young people, and their families, as well as KCC and its partners. By taking a measured approach KCC are wanting to assess the impact of any changes before looking to adopt the system for all age ranges. The current processes for allocating resource to 0–4-year-olds, and over 16’s not attending sixth form in state funded schools’, function adequately, and could therefore wait and benefit from any learning found by implementing the changes for 5-16-year-olds. Data collected by the HNF Team shows a snapshot of 3,637 children and young people paid HNF by KCC during October 2023, (1,592 of these had an Education, Health, and Care Plan - EHCP). 3,261 were primary school age and 376 were secondary school age.

**d) Responsible Officer for Mitigating Actions - Age**

Siobhan Price – Education Officer, Mainstream Inclusion, CYPE

**20. Negative Impacts and Mitigating actions for Disability**

**a) Are there negative impacts for Disability? Answer: Yes/No**  
 (If yes, please also complete sections b, c, and d).

Yes

**b) Details of Negative Impacts for Disability**

SEN is not a disability, however, those with the highest levels of SEN may have an accompanying issue that is categorised as a disability and that is what makes them have exceptional need, so those with a disability may be disproportionately impacted. Funding and support may change under the new system. The service that children, young

people and their families receive may be delivered in a different way, for example, by a different provider, in a group rather than individual setting, or at a different location. This may impact accessibility of resource for children and young people with a disability.

4 consultation responses were received relating to disability:

- 'This will make life harder and less consistent for children with disabilities'
- 'Where do disabled children feature in the locality model? Surely should still be referred to as SEND'
- 'This needs to be addressed before changes are made to ensure this vulnerable group is not further disadvantaged' and
- 'Difficulties will arise in ensuring parents of children with a disability currently receiving HNF understand that the new model will mean they will not be entitled to one-to-one support'

### c) Mitigating Actions for Disability

If the proposed Locality Model proceeds, children and young people with a disability will be supported by the new model of working that uses local resources and collaborations in local clusters to best support all children within their locality. There will be a carefully planned transition period, between the current and any new model. It will be within this transition period that KCC and schools will plan for and communicate any changes to be made to a child's provision.

The proposed model will enable greater inclusion of all students in mainstream settings, meaning that they can attend schools locally (reduced travel time) and build links, friendships and integrate into their local community.

No child that needs additional support will go without it, the funding will still be there, but it will be allocated differently, giving more influence to the schools who know and work with the child and their family.

KCC understand the concern any proposed change naturally invokes, and if the Locality Model is adopted, all potentially disadvantaged groups will be regularly assessed and monitored. It is not clear how the model could make life harder or less consistent at this stage for children and young people with disabilities and this would be closely considered in any implementation planning and activity. Disabled children and young people would access the Locality Model resources in the same way all 5-16-year-olds would, the terms SEN and SEND have been distinguished separately in the consultation documentation due to the structures of KCC Directorates and where the service responsibilities are held, it does not add barriers to accessing resource. The Locality Model does not remove entitlement to one-to-one support, all children, and young people in receipt of support currently, who would move to being supported under the Locality Model, would have any changes planned for and in direct communication with their parents/carers.

Data collected by the HNF Team shows a snapshot of 3,637 children and young people paid HNF by KCC during October 2023.

These are broken down into the following category of need:

Communication & Interaction 1,767

Hearing Impaired 36

Moderate Learning Difficulties 131

Other (medical) 52

Physical Disability 163

Profound & Multiple Learning Difficulties 12

Severe Learning Difficulties 51

Social Emotional Mental Health 851

Specific Learning Difficulties 89

Speech & Language Disorder/Impairment 453

Unknown 2

Visual Impairment 30

### d) Responsible Officer for Mitigating Actions - Disability

Siobhan Price – Education Officer, Mainstream Inclusion, CYPE

## 21. Negative Impacts and Mitigating actions for Sex

a) Are there negative impacts for Sex? *Answer: Yes/No*  
(If yes, please also complete sections b, c, and d).

No

### b) Details of Negative Impacts for Sex

3 consultation responses were received for this category, with 2 expressing concern data is not available, and therefore there is potential for one group to be disproportionately affected if they feature more in a SEND category.

'It's important to have up to date information regarding the research available concerning female neurodiverse students.

The information ...is out of date and overlooks a lot of female symptoms and expressions of the condition. Due to this, masking in school is often overlooked so that the girls are missing out on interventions. This is because of the 'needs' basis which does not take into account the quieter disposition of female SEN students who are in fact struggling internally'.

### c) Mitigating Actions for Sex

Improvements to the data collected, which can in turn be analysed, is part of the Locality Model proposals. By increasing this 'data' knowledge, improved planning and mitigation for risks impacting different groups of children and young people can be put in place. Mainstream Core Standards, Quality First Teaching and stronger inclusion practice should gain wider traction through the Locality Model, and the opportunity for peer review and challenge this model brings. This increased transparency and communication between schools on their local responses to these diverse groups should bring about positive change.

Data collected by the HNF Team shows a snapshot of 3,637 children and young people paid HNF by KCC during October 2023.

Gender information is not collected in the data supplied by the HNF Team.

### d) Responsible Officer for Mitigating Actions - Sex

Siobhan Price – Education Officer, Mainstream Inclusion, CYPE

## 22. Negative Impacts and Mitigating actions for Gender identity/transgender

a) Are there negative impacts for Gender identity/transgender? *Answer: Yes/No*  
(If yes, please also complete sections b, c, and d).

No

### b) Details of Negative Impacts for Gender identity/transgender

Consultation responses relating to gender identity and transgender categories were received, with 14 items of feedback.

11 responses identified the need to 'consider and use up to date inclusive language around gender identity. Need more focus on the benefits and positive impact on equality and diversity and inclusion rather than on the financial situation'. Another highlighted ' Research shows that high levels of young people who identify as transgender or non-binary also have SEN/neurodiversity challenges. This group could therefore be particularly impacted by these changes.'

**c) Mitigating actions for Gender identity/transgender**

Improvements to the data collected, which can in turn be analysed, is part of the Locality Model proposals. By increasing this 'data 'knowledge, improved planning and mitigation for risks impacting different groups of children and young people can be put in place.

Data collected by the HNF Team shows a snapshot of 3,637 children and young people paid HNF by KCC during October 2023.

Gender information is not collected in the data supplied by the HNF Team.

**d) Responsible Officer for Mitigating Actions - Gender identity/transgender**

Siobhan Price – Education Officer, Mainstream Inclusion, CYPE

**23. Negative Impacts and Mitigating actions for Race**

**a) Are there negative impacts for Race? Answer: Yes/No**  
(If yes, please also complete sections b, c, and d).

No

**b) Details of Negative Impacts for Race**

9 comments were received directly relating to impacts for race, mainly regarding children and young people who are categorised with English as an Additional Language for them (EAL) although more responses (20) were received on other socio-economic factors and factors of deprivation which also mentioned EAL.

Some comments received:

- 'Our mobility is very high with children moving from other Countries and Counties. What support is going to be put in place for these children?'
- 'How are schools identifying SEN in children with EAL at early stages of language acquisition and in refugee children? Are they accessing appropriate support to differentiate between SEN and EAL, to access relevant training (e.g. around trauma or academic literacy)? Do parents and carers of children with these protected characteristics have equal access to the information about what support at school level should be expected and do they understand what HNF is and how and when schools apply for it?'
- 'There needs to be a greater understanding that within the Kent area, children who are non-white are largely in the minority. My daughter is the only non-white child in her year group at school and one of a handful of non-white children within the school. These children are already different from their peers. Then when you add in that they are SEN as well, this makes them more different from their peers again and can be another factor which makes them more vulnerable.'
- 'Gypsy, Traveller, Roma, Showmen and Boaters (GRTSB) children will also have additional barriers due to their high migration - how might they be supported if they continually move and so change clusters?'

**c) Mitigating Actions for Race**

Improvements to the data collected, which can in turn be analysed, is part of the Locality Model proposals. By increasing this 'data 'knowledge, improved planning and mitigation for risks impacting different groups of children and young people can be put in place. Mainstream Core Standards, Quality First Teaching and stronger inclusion practice should gain wider traction through the Locality Model, and the opportunity for peer review and challenge this model brings. This increased transparency and communication between schools on their local responses to these diverse groups should bring about positive change.

How GTRSB children and young people are supported by a Locality Model raises an important point that had not been highlighted in our development work and will now be a specific point in discussions of how to implement the model with due regard to these children and young people.

Data collected by the HNF Team shows a snapshot of 3,637 children and young people paid HNF by KCC during October 2023.

Race information is not collected in the data supplied by the HNF Team.

**d) Responsible Officer for Mitigating Actions – Race**

Siobhan Price – Education Officer, Mainstream Inclusion, CYPE

**24. Negative Impacts and Mitigating actions for Religion and belief**

**a) Are there negative impacts for Religion and Belief? Answer: Yes/No**  
(If yes, please also complete sections b, c, and d).

No

**b) Details of Negative Impacts for Religion and belief**

**c) Mitigating Actions for Religion and belief**

Improvements to the data collected, which can in turn be analysed, is part of the Locality Model proposals. By increasing this 'data 'knowledge, improved planning and mitigation for risks impacting different groups of children and young people can be put in place. Mainstream Core Standards, Quality First Teaching and stronger inclusion practice should gain wider traction through the Locality Model, and the opportunity for peer review and challenge this model brings. This increased transparency and communication between schools on their local responses to these diverse groups should bring about positive change.

Data collected by the HNF Team shows a snapshot of 3,637 children and young people paid HNF by KCC during October 2023.

Religion and Belief information is not collected in the data supplied by the HNF Team.

**d) Responsible Officer for Mitigating Actions - Religion and belief**

Siobhan Price – Education Officer, Mainstream Inclusion, CYPE

**25. Negative Impacts and Mitigating actions for Sexual Orientation**

**a) Are there negative impacts for sexual orientation. Answer:**  
**Yes/No (If yes, please also complete sections b, c, and d).**

No

**b) Details of Negative Impacts for Sexual Orientation**

One comment relating to the category of sexual orientation was received in the consultation, this was 'Consider additional needs of kids from LGBTQ+ communities'.

**c) Mitigating Actions for Sexual Orientation**

Improvements to the data collected, which can in turn be analysed, is part of the Locality Model proposals. By increasing this 'data' knowledge, improved planning and mitigation for risks impacting different groups of children and young people can be put in place. Mainstream Core Standards, Quality First Teaching and stronger inclusion practice should gain wider traction through the Locality Model, and the opportunity for peer review and challenge this model brings. This increased transparency and communication between schools on their local responses to these diverse groups should bring about positive change.

Data collected by the HNF Team shows a snapshot of 3,637 children and young people paid HNF by KCC during October 2023.

Sexual Orientation information is not collected in the data supplied by the HNF Team.

**d) Responsible Officer for Mitigating Actions - Sexual Orientation**

Siobhan Price – Education Officer, Mainstream Inclusion, CYPE

**26. Negative Impacts and Mitigating actions for Pregnancy and Maternity**

**a) Are there negative impacts for Pregnancy and Maternity? Answer: Yes/No**  
(If yes, please also complete sections b, c, and d).

No

**b) Details of Negative Impacts for Pregnancy and Maternity**

**c) Mitigating Actions for Pregnancy and Maternity**

Data collected by the HNF Team shows a snapshot of 3,637 children and young people paid HNF by KCC during October 2023.

Pregnancy and maternity information are not collected in the data supplied by the HNF Team.

**d) Responsible Officer for Mitigating Actions - Pregnancy and Maternity**

Siobhan Price – Education Officer, Mainstream Inclusion, CYPE

**27. Negative Impacts and Mitigating actions for marriage and civil partnerships**

**a) Are there negative impacts for Marriage and Civil Partnerships? Answer: Yes/No**  
(If yes, please also complete sections b, c, and d).

No

**b) Details of Negative Impacts for Marriage and Civil Partnerships**

**c) Mitigating Actions for Marriage and Civil Partnerships**

Data collected by the HNF Team shows a snapshot of 3,637 children and young people paid HNF by KCC during October 2023.

Marriage and civil partnerships information is not collected in the data supplied by the HNF Team.

**d) Responsible Officer for Mitigating Actions - Marriage and Civil Partnerships**

Siobhan Price – Education Officer, Mainstream Inclusion, CYPE

**28. Negative Impacts and Mitigating actions for Carer's responsibilities**

**a) Are there negative impacts for Carer's responsibilities? Answer: Yes/No**  
(If yes, please also complete sections b, c, and d).

No

**b) Details of Negative Impacts for Carer's Responsibilities**

2 responses in the consultation related to carers responsibilities, one asked schools' to provide support for young carers not wait for outside services to support them and the other stating 'Dover SmArt project is a charity supporting young carers and there are other young carer groups across Kent. Link with your own teams within KCC to find the contact details for them all and specifically ask the Carer groups to engage with the survey at the very least'.

**c) Mitigating Actions for Carer's responsibilities**

Improvements to the data collected, which can in turn be analysed, is part of the Locality Model proposals. By increasing this 'data' knowledge, improved planning and mitigation for risks impacting different groups of children and young people can be put in place. Mainstream Core Standards, Quality First Teaching and stronger inclusion practice should gain wider traction through the Locality Model, and the opportunity for peer review and challenge this model brings. This increased transparency and communication between schools on their local responses to these diverse groups should bring about positive change. Collecting the voice of children and young people is an identified priority for KCC and this project supports this wherever possible.

Data collected by the HNF Team shows a snapshot of 3,637 children and young people paid HNF by KCC during October 2023.

Carer responsibility information is not collected in the data supplied by the HNF Team.

**d) Responsible Officer for Mitigating Actions - Carer's Responsibilities**

Siobhan Price – Education Officer, Mainstream Inclusion, CYPE