



KENT COUNTY COUNCIL SPECIAL SCHOOLS REVIEW CONSULTATION REPORT

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CONTENTS

Executive Summary	3
Background and Methodology	5
Consultation profile and awareness	11
Proportion of consultees with children in education and children with special educational needs	16
Response to consultation proposals	19
Response to Equality Impact Assessment	62
Next steps	64
Appendix – consultation questionnaire	65

EXECUTIVE SUMMARY

1,351 responses were received to the consultation. The largest proportion of consultees responding are residents of Kent (59%); 4% of consultees are residents that live outside of Kent, including Medway. 162 questionnaire submissions were received from education professionals. 140 questionnaire submissions were received on behalf of a special school. 55 questionnaire submissions were received from mainstream primary / secondary schools.

The majority of residents / individuals answering the consultation are a parent / carer of a child / children in education (86%). 53% of these residents / individuals have at least one primary aged child (aged 5-11 years old). 55% of these residents / individuals have at least one secondary aged child (11-16 years old). Just over two thirds of residents / individuals answering have a child with Special Educational Needs and an Education, Health and Care Plan who is educated in Kent (68%). 18% has a child / children with Special Educational Needs who does not have an Education, Health and Care Plan.

The Special Schools Review consultation sets out proposals regarding the future designations of special schools, the supporting admission guidance and a school-to-school model of support.

The level of support for each of the proposals outlined can be found below:

Special school expectation statement

Agreement with KCC planning special school places for those children who have severe and complex needs

Views are polarising with 50% agreeing KCC should be planning special school places for those children who have severe and complex needs (39% strongly agree, 11% tend to agree). 44% indicated that KCC should not be making such plans (8% tend to disagree, 36% strongly disagree).

Proposed designation and admission guidance

Agreement with moving to three designations for special schools

18% agree moving to three designations for special schools will enable KCC to achieve the aim of providing special school provision for children and young people in Kent with severe and complex special educational needs (7% strongly agree, 10% tend to agree¹). 70% disagree with the proposed movement and the strength of disagreement is high (10% tend to disagree, 60% strongly disagree).

Proposed implementation

Agreement with graduated approach to the change over time

24% indicated they agree with the proposed graduated approach to the change over time (10% strongly agree, 15% tend to agree²). 61% disagree with the proposed approach and the strength of disagreement is quite high (8% tend to disagree, 53% strongly disagree).

¹ 18% net agree is a rounded sum of 7% strongly agree and 10% tend to agree

² 24% net agree is a rounded sum of 10% strongly agree and 15% tend to agree

Proposed school-to-school model of support

Agreement with prompted actions being part of the model

Of the four components of the model proposed, agreement is highest for 'special schools proactively working with local Further Education colleges and other providers to improve adapted curriculum and access to specialist teaching facilities in the Post-16 sector' (68%). Just under two thirds (63%) indicated they agree with 'mainstream settings being able to request a one-to-one consultation with lead teachers from special schools on specific aspects of education'.

62% indicated they agree with 'special schools designating specific days when mainstream colleagues from their locality are invited to visit, shadow special school staff and observe their practices'.

Agreement is lowest with 'special schools supporting transition for children or young people (re)integrating into mainstream settings' (49%); 40% disagree with this part of the model.

BACKGROUND AND METHODOLOGY

Background

From November 2022 there has been an ongoing review of the twenty-four state funded special schools in Kent. These schools provide an education for children and young people aged 5-19 years of age with special educational needs and disabilities (SEND), who have an Education, Health and Care Plan. This consultation is about changes arising from the special school review.

The Special Schools Review consultation sets out proposals regarding the future designations of special schools, the supporting admission guidance and a school-to-school model of support. These changes have been proposed to assist implementation of the wider changes for children with Special Educational Needs and Disabilities (SEND) across mainstream schools and Special Resource Provisions (SRPs).

Of Kent's twenty-four state-funded special schools, the proposed changes outlined in this consultation would affect seven schools' designation and admission guidance whilst an additional two schools would be affected by the proposed admission guidance only. In total, nine state-funded special schools would be affected by the proposed changes to designation and admission guidance; seven of these are maintained special schools and two are part of an Academy Trust. KCC would like the proposed school-to-school support model to be adopted by all Kent special schools as the approach to providing expertise and guidance for children with SEND in mainstream schools.

If agreed, the changes proposed in this consultation would likely take effect from September 2026 and would apply to children and young people entering a special school placement from that date. Children already enrolled in a special school would continue to attend that special school. The process for their continued attendance would remain the same as it currently stands, with their needs and the suitability of their school placement being reviewed and considered through the annual review of their Education, Health and Care Plan.

Below is the list of Kent's state funded special schools showing whether and/or how each school would be affected by the proposed changes. Please note schools affected by the proposed change which are part of an Academy Trust are denoted with an Asterix (*).

SCHOOL NAME	Designation change	Admission guidance change
*Aspire (Bourne Alliance Multi Academy Trust)	Yes	Yes
Bower Grove School	No	No
Broomhill Bank School	Yes	Yes
Elms School	No	No
Five Acre Wood School	No	No
Foreland Fields School	No	No
Goldwyn	No	Yes
Grange Park School	Yes	Yes
Ifield School	No	No
Laleham Gap School	Yes	Yes

SCHOOL NAME	Designation change	Admission guidance change
Meadowfield School	No	No
Milestone Academy	No	No
Nexus School	No	No
Oakley School	No	No
Portal House School	No	Yes
Rowhill School	No	No
*Snowfields Academy (Leigh Academies Trust)	Yes	Yes
St Anthony's School	No	No
St Nicholas School	No	No
Stone Bay School	Yes	Yes
The Beacon	No	No
The Orchard School	No	No
The Wyvern School	No	No
Valence School	Yes	Yes

Consultation process

On 19 June 2024, a 6-week consultation was launched and ran until the 14 August 2024 (following a 2-week extension). The consultation invited residents, schools, education professionals and other interested parties to provide views on proposals.

Feedback was captured via a consultation questionnaire which was available on the KCC engagement website (www.letstalk.kent.gov.uk/special-schools-review). Hard copies of the consultation material, including the questionnaire were also available on request and provided to several individuals and groups. Large print copies were available from the consultation webpage and consultation material and the webpage included details of how people could contact KCC to ask a question, request hard copies or an alternative format. A Word version of the questionnaire was provided on the webpage for people who did not wish to complete the online version.

To raise awareness of the consultation and encourage participation, the following was undertaken:

- Email sent to stakeholder database and those registered with Let's talk Kent who had expressed an interest in being kept informed of consultations about 'children and families' and 'schools and education' (7,350 people).
- Media release issued: [Consultation opens on Special Schools Review - News & Features - Kent County Council](#).
- Promoted via social media on KCC's corporate channels (X, Facebook, Instagram, Nextdoor, LinkedIn).
- Article in KCC's residents e-newsletter.
- Article in KCC's SEND newsletter.
- Article in KELSIs schools bulletin and on the KELSIs website.

- KCC asked schools to promote the consultation with their parents/carers.
- Promoted on staff communication channels.
- Information added to relevant pages on kent.gov.uk.

A summary of interaction and supply of consultation material can be found below:

- 48,901 visits to the consultation webpage by 16,803 visitors during the consultation period.
- Organic posts via KCC’s corporate channels had a reach of 96,071 on Facebook and Instagram. There were 125,396 impressions on X (Twitter), LinkedIn, Nextdoor and Instagram. Reach refers to the number of people who saw a post at least once and impressions are the number of times the post is displayed on someone’s screen. The posts generated 6,881 clicks through to the consultation webpage. (Not all social media platforms report the same statistics).
- One hard copy of the consultation document and questionnaire were requested and provided.
- The number of document downloads are shown in the table below.

Document name	Downloads / views
Consultation document	4,278
Equality Impact Assessment	220
Engagement schedule	87
Map of current special school designations	191
Map of proposed special school designations	241
Frequently Asked Questions	321
Word version of the questionnaire	158
Consultation document – large print	1
Frequently Asked Questions – large print	0
Equality Impact Assessment – large print	0
Consultation Questionnaire – large print	0

A consultation stage Equality Impact Assessment (EqIA) was carried out to assess the impact the proposed changes could have on those with protected characteristics. The EqIA was available as one of the consultation documents and the questionnaire invited consultees to comment on the assessment that had been carried out. An analysis of responses to this question can be found with the ‘Response to consultation proposals’ overall findings section of this report.

Engagement events both online and in person were also undertaken as part of the consultation. During the consultation period, Local Authority Officers attended professional and public events, to discuss and answer questions on the proposals. These were:

- Two face-to-face special school events, one for Headteachers and one for Chair of Governors. Some special school Headteachers attended both events.
- Four mainstream Headteacher events, one aimed at each area of Kent.

- Five parent/carers online events with over 200 attendees in total.
- Three face-to-face focus groups run by Assistant Educational Psychologists (AEPs) with students at three special schools as part of Kent Young People's Voice Project. It should be noted that a cross section of seven specialist schools were invited to participate in this consultation. These schools were selected as they represented each quadrant of Kent and had either previously participated in the initial young people's voice project, and/or had a proposed change to their designation and/or admission guidance.
- One online event aimed at other Local Authorities.

Key concerns raised by special school headteachers were:

- The buildings of schools that the Local Authority has proposed have a change to designation are not suitable for providing education for the children that the Local Authority proposes placing at the school without adaptations and/or, in some cases, there are limitations to the adaptations that can be made (due to, for example, planning restrictions). The environment needs to be suitable, so that schools can prepare for and provide suitable education.
- Special school Headteachers shared a strong view that the children who are being provided with special education in a Communication & Interaction special school under current admission guidance are children with complex needs and that by admitting children with learning difficulties, the current cohort will not have suitable education, and this will drive up demand for the private school sector. This criticism applied particularly to the proposal to introduce the designation of 'Neurodivergent with Learning Difficulties'.
- Special school Headteachers said that, unless they had information about the funding of a 'school-to-school' support model they couldn't engage with discussion about what could be provided by special schools, to support pupils with SEND in mainstream schools.

The main themes from parent/carers sessions were:

- A lack of confidence in mainstream schools' abilities to meet the needs of children and young people with SEND.
- Concerns were raised around the removal of the Communication and Interaction special school designation and Physical Disabilities and Complex Medical Needs designation. There were concerns as to whether it would result in some children falling between the gap.
- Parents and carers shared personal experiences of individual cases whereby their child or young person's needs had not been met prior to them attending a Communication and Interaction special school.
- There was concern that children and young people already enrolled at a special school would be removed if the changes were implemented. In each session, time was spent by Local Officers reassuring parents and carers that this was not the case.

The main themes of discussions from the children and young people focus groups were:

- Some pupils believe those with severe and complex needs should be prioritised for school places at specialist provision, whereas others highlighted the nuances of taking each

individual profile into account and to what extent they would be able to cope in a mainstream school.

- There was general positive feedback regarding the proposed school-to-school model. Improving mainstream schools' staff knowledge on special school practices was welcomed to bridge the gap between the two sectors.
- The pupils valued being able to feedback their thoughts and opinions directly to KCC and would like this to continue. students implied the need for not only greater information on their futures from Kent County Council but also from individual colleges and settings. The implication being that both the student as well as their support system would have greater confidence in their future aspirations. The students spoke about the positives of attending a local school and noted how students with SEND struggle with long journeys. It was important to the students that local schools would need to be able to meet their needs and have the right facilities.

Consultation response

- 1,351 responses were received to the consultation questionnaire – 1,345 questionnaires were submitted online and 6 questionnaires were submitted in hard copy or by email.
- An additional 10 emails / letters were received by the KCC project team and passed to Lake Market Research for review. Their open feedback has been considered alongside the data collected in the official consultation questionnaire and are therefore included in this report's analysis.

Points to note

- Consultees were given the choice of which questions to answer / provide a comment for. The number of consultees providing an answer to each question is shown on each chart / data table featured in this report.
- Consultees were asked to detail the reasons for their views in their own words. For the purpose of reporting, we have reviewed the comments made at each of these questions and grouped common responses together into themes. These themes are reported where relevant in this report. Please note the percentages in these data tables will exceed the sum of 100% and comments often cover more than one theme.
- Each chart displays the percentages for each response code in a question. Please note that all percentages are rounded to the nearest whole number and do not include decimal places. As a result, the sum of individual percentages in any single choice question may not sum to 100% due to rounding. In addition, the sum of individual percentages may not sum to a net percentage (e.g. the percentage for strongly agree and tend to agree may not sum to the net agree percentage).
- Any significant differences by consultee subgroup (such as consultee type, children with / without EHCPs) have been noted accordingly for each relevant question. There are no significant differences in response by other protected characteristics (e.g. gender, age, disability, ethnicity, religion).
- Please note that participation in consultations is self-selecting and this needs to be considered when interpreting responses. Responses to consultations do not wholly

represent the local resident population or current service users and is reliant on awareness and propensity to take part based on the topic and interest.

- Whilst this consultation was open to residents to participate, it should be noted that 86% of resident / individual consultees responding indicated they have a child / children in education.
- KCC were responsible for the design, promotion and collection of the consultation responses. Lake Market Research were appointed to conduct an independent analysis of feedback.
- The consultation document originally specified the designation of Valence School as 'Physical Disability (PD)', which was consistent with the type of SEN provision recorded on the Department for Education's 'Get Information About Schools' ('GIAS') website for Valence School at the time. It was brought to KCC's attention, from responses to the consultation, that following the previous review of special schools in 2001, the full description of the designation used was 'Physical Disabilities and/or Complex Medical Needs'. Valence School remains the only special school in Kent within that designation. In response to this, the consultation document was updated to reflect the full description of the current PD designation.

Those that had already responded to the consultation were invited to re-submit their consultation response if they felt that the wording update in the consultation document would have impacted how they responded. To enable time for this, the consultation period was extended by 2 weeks.

CONSULTATION PROFILE AND AWARENESS

Response profile

The largest proportion of consultees responding are residents of Kent (59%); 4% of consultees are residents that live outside of Kent, including Medway. 162 questionnaire submissions were received from education professionals. 140 questionnaire submissions were received on behalf of a special school. 55 questionnaire submissions were received from mainstream primary / secondary schools.

CONSULTEE TYPE	Number of responses	Percentage
As a Kent resident (living in the Kent County Council authority area)	796	59%
As an education professional	162	12%
On behalf of a special school	140	10%
As a resident from somewhere else, such as Medway	51	4%
As a KCC employee	49	4%
On behalf of a mainstream primary school	41	3%
On behalf of a mainstream secondary school	15	1%
On behalf of a charity or Voluntary, Community or Social Enterprise organisation (VCSE)	9	1%
On behalf of a friend or relative	6	0.4%
As a Parish / Town / Borough / District / County Councillor	3	0.2%
On behalf of an early year's education provider, such as a nursery	2	0.1%
Something else	76	6%
Prefer not to answer / left blank	1	0.1%

Demographic profile

The tables below show the demographic profile of resident / individual consultees who completed the consultation questionnaire (853 in total). The proportion who left these questions blank or indicated they did not want to disclose this information has been included as applicable.

GENDER (RESIDENT CONSULTEES ONLY)	Number of responses	Percentage
Male	125	15%
Female	600	70%
Prefer not to say / blank	128	15%

AGE (RESIDENT CONSULTEES ONLY)	Number of responses	Percentage
0-15	2	0.2%
16-24	14	2%
25-34	95	11%
35-49	420	49%
50-59	146	17%
60-64	16	2%
65-74	33	4%
75-84	6	1%
85 and over	0	0%
Prefer not to say / blank	121	14%

DISABILITY (RESIDENT CONSULTEES ONLY)	Number of responses	Percentage
Yes	115	13%
- Physical impairment	38	4%
- Sensory impairment	14	2%
- Longstanding illness or health condition	41	5%
- Mental health condition	44	5%
- Learning disability	17	2%
- Other	22	3%
No	609	71%
Prefer not to say / blank	129	15%

CARER (RESIDENT CONSULTEES ONLY)	Number of responses	Percentage
Yes	437	51%
No	285	33%
Prefer not to say / blank	131	15%

ETHNICITY (RESIDENT CONSULTEES ONLY)	Number of responses	Percentage
White English	646	76%
White Scottish	6	1%
White Welsh	6	1%
White Northern Irish	3	0.4%
White Irish	3	0.4%
White Gypsy / Roma	2	0.2%
Asian or Asian British Indian	4	0.5%
Mixed White & Black Caribbean	5	1%
Mixed White & Asian	5	1%
Black or Black British Caribbean	2	0.2%
Other	26	3%
Prefer not to say / blank	145	17%

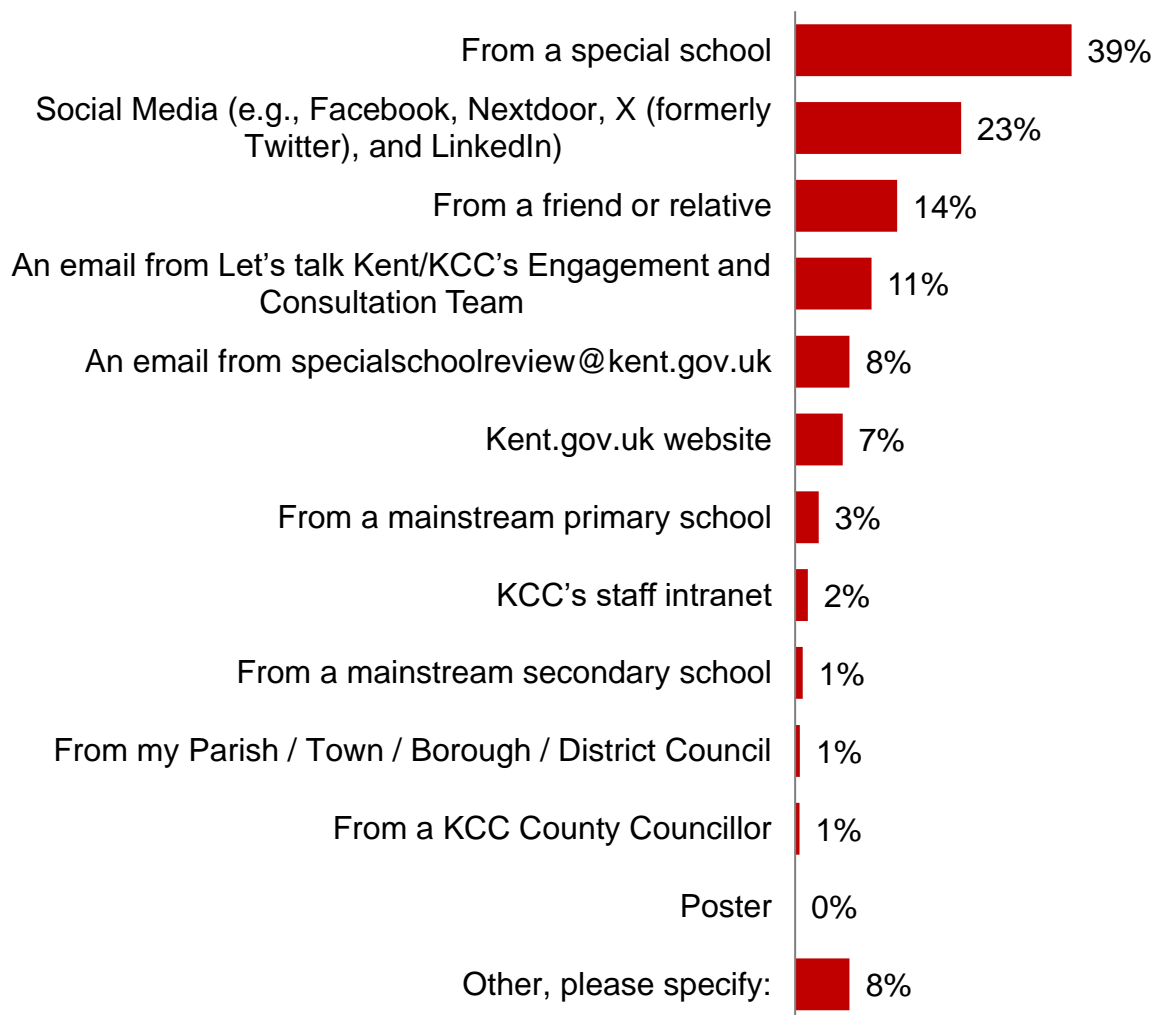
RELIGION (RESIDENT CONSULTEES ONLY)	Number of responses	Percentage
Yes	200	23%
- Christian	182	21%
- Buddhist	1	0.1%
- Hindu	1	0.1%
- Sikh	2	0.2%
- Other	10	1%
No	508	60%
Prefer not to say / blank	145	17%

Consultation awareness

The most common means of finding out about the consultation is from a special school (39%) or social media (23%). 14% found out via a friend of relative.

11% found out about the consultation via an email from Let's talk Kent / KCC's Engagement and Consultation team and 8% found out via an email from the dedicated special school review webpage.

How did you find out about this consultation? Base: all providing a response (1,345)



SUPPORTING DATA TABLE	Number of responses	Percentage
From a special school	518	39%
Social Media (e.g., Facebook, Nextdoor, X (formerly Twitter), and LinkedIn)	311	23%
From a friend or relative	191	14%
An email from Let's talk Kent / KCC's Engagement and Consultation Team	143	11%
An email from specialschoollreview@kent.gov.uk	102	8%
Kent.gov.uk website	89	7%
From a mainstream primary school	44	3%
KCC's staff intranet	24	2%
From a mainstream secondary school	14	1%

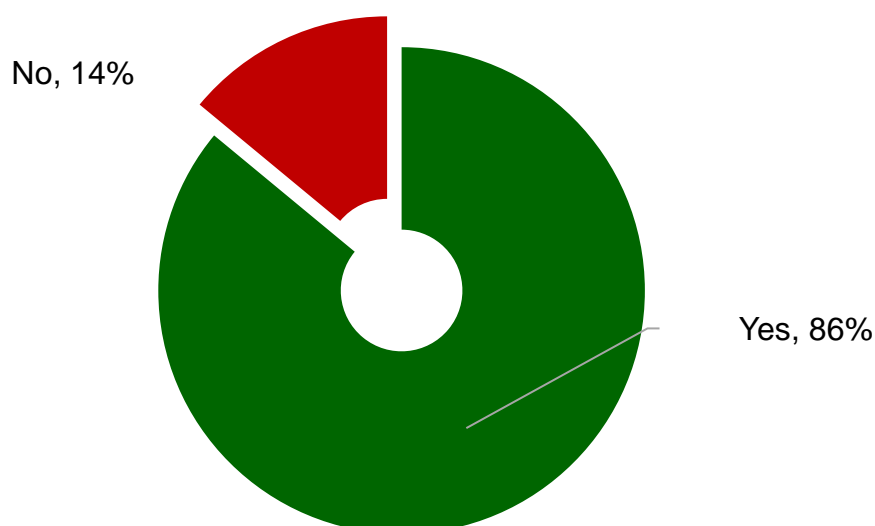
SUPPORTING DATA TABLE	Number of responses	Percentage
From my Parish / Town / Borough / District Council	9	1%
From a KCC County Councillor	8	1%
Poster	0	0%
Other (e.g. IASK, word of mouth, online articles)	102	8%

PROPORTION OF CONSULTEES WITH CHILDREN IN EDUCATION AND CHILDREN WITH SPECIAL EDUCATIONAL NEEDS

Proportion of consultees with child in education

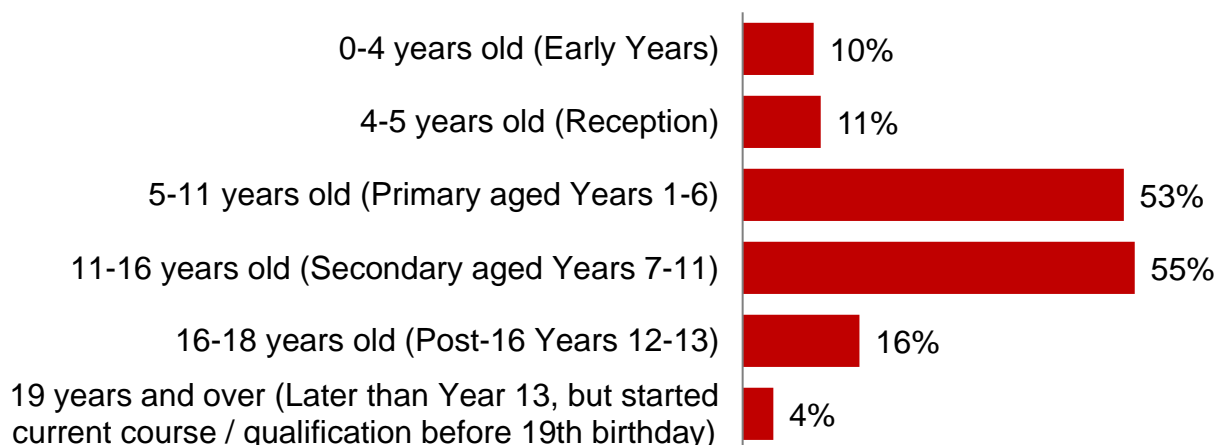
The majority of residents / individuals answering the consultation indicated they are a parent / carer of a child / children in education (86%). 53% of these residents / individuals have at least one primary aged child (aged 5-11 years old). 55% of these residents / individuals have at least one secondary aged child (11-16 years old).

Are you a parent or carer of a child / children in education? By education we mean attending nursery, school, college, or other further learning ...? Base: all residents / individuals (929), the sum of individual percentages may not sum to 100% due to rounding.



SUPPORTING DATA TABLE	Number of responses	Percentage
Yes	799	86%
No	130	14%

Please select the age group(s) that apply to your child / children...? Base: all non-organisations / not answering questionnaire in professional capacity (797)



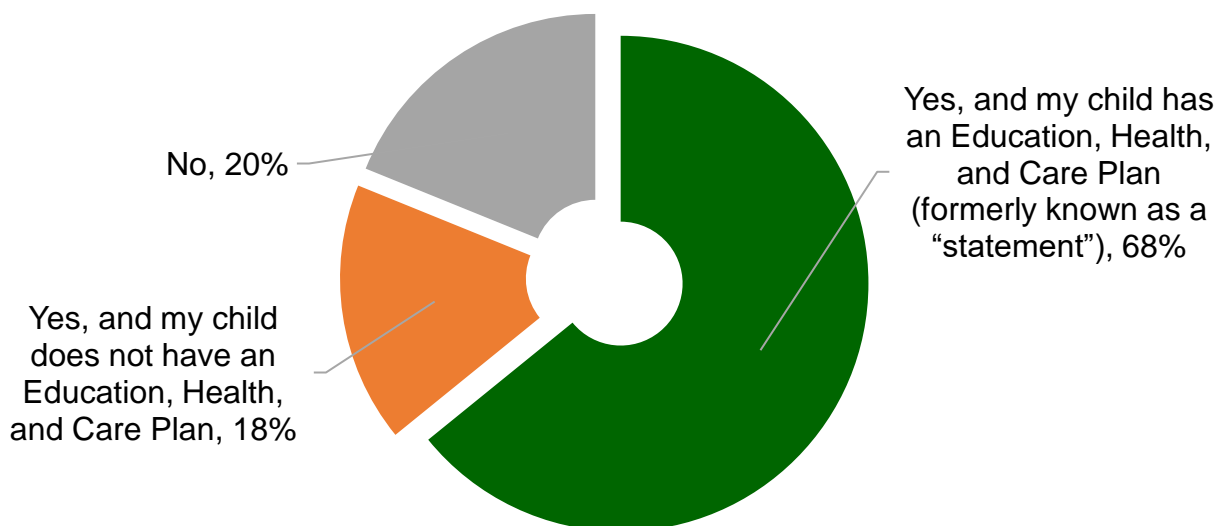
SUPPORTING DATA TABLE	Number of responses	Percentage
0-4 years old (Early Years)	79	10%
4-5 years old (Reception)	87	11%
5-11 years old (Primary aged Years 1-6)	424	53%
11-16 years old (Secondary aged Years 7-11)	436	55%
16-18 years old (Post-16 Years 12-13)	130	16%
19 years and over (Later than Year 13, but started current course / qualification before 19th birthday)	34	4%

Proportion of consultees with child / children with Special Educational Needs who is / are educated in Kent

Just over two thirds of residents / individuals answering the consultation indicated they have a child with Special Educational Needs and an Education, Health and Care Plan who is educated in Kent (68%). 18% has a child / children with Special Educational Needs who does not have an Education, Health and Care Plan.

Do you have a child / children with Special Educational Needs who is educated in Kent?

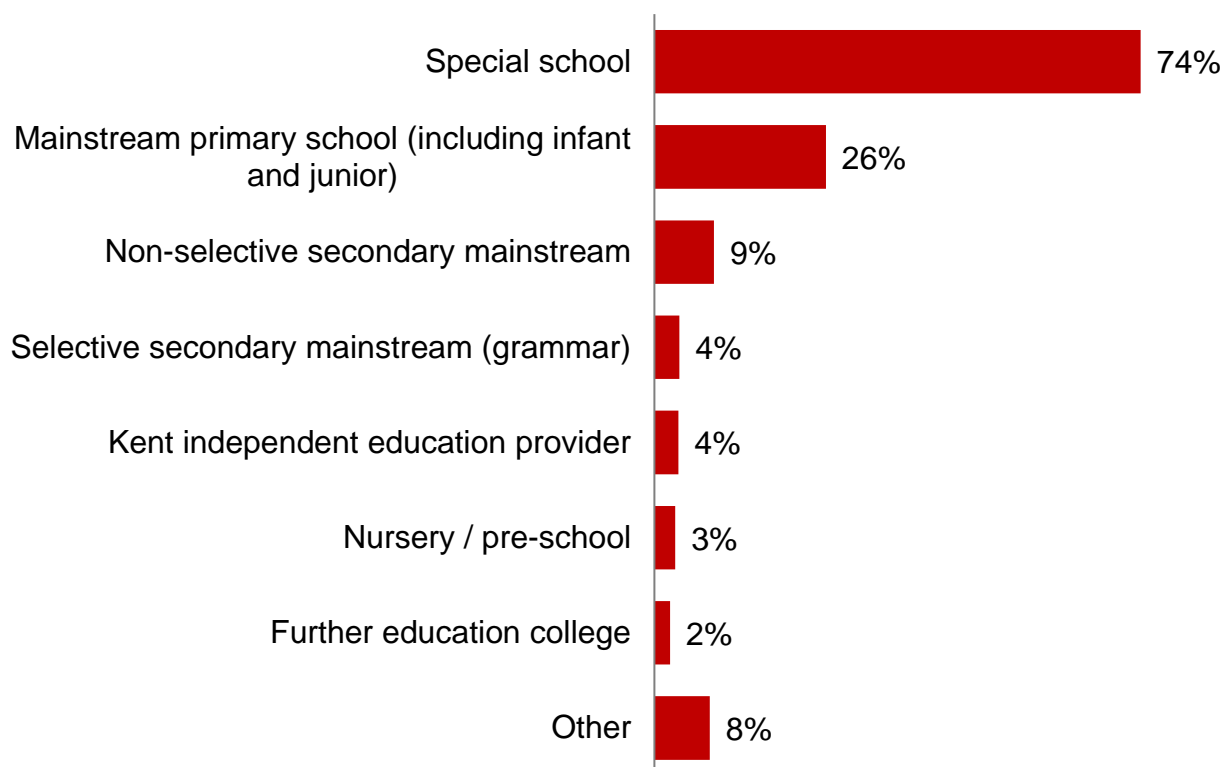
Base: all non-organisations / not answering questionnaire in professional capacity (930), the sum of individual percentages may not sum to 100% due to rounding.



SUPPORTING DATA TABLE	Number of responses	Percentage
Yes, and my child has an Education, Health, and Care Plan (formerly known as a "statement")	630	68%
Yes, and my child does not have an Education, Health, and Care Plan	171	18%
No	190	20%
Don't know	4	0%

Just under three quarters of residents / individuals who indicated they have a child / children with Special Educational Needs go to a special school (74%). 26% indicated they have a child / children at a mainstream primary school. 9% have a child / children at a non-selective secondary mainstream and 4% have a child / children at a selective secondary mainstream.

Please tell us which type of school or further education establishment in Kent your child / children attend...? Base all consultees with a child / children with Special Educational Needs who is educated in Kent (631)



SUPPORTING DATA TABLE	Number of responses	Percentage
Special school	465	74%
Mainstream primary school (including infant and junior)	164	26%
Non-selective secondary mainstream	57	9%
Selective secondary mainstream (grammar)	24	4%
Kent independent education provider	23	4%
Nursery / pre-school	20	3%
Further education college	15	2%
Other	53	8%

RESPONSE TO CONSULTATION PROPOSALS

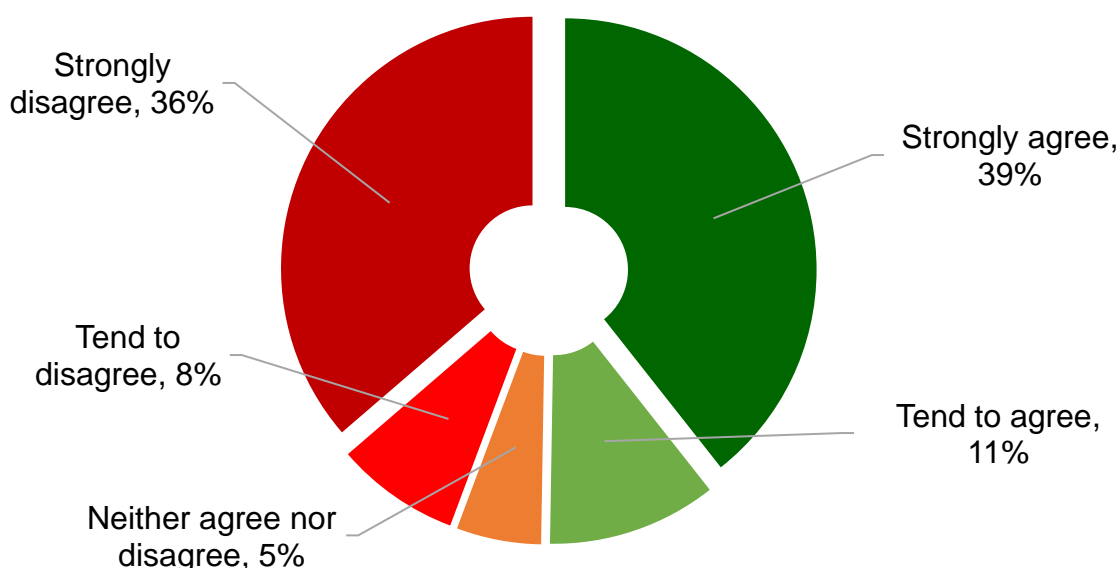
This section of the report details response to the proposals put forward in the consultation.

Special school expectation statement

Agreement with KCC planning special school places for those children who have severe and complex needs

Views are polarising with 50% indicating they agree that KCC should be planning special school places for those children who have severe and complex needs (39% strongly agree, 11% tend to agree). 44% indicated that KCC should not be making such plans (8% tend to disagree, 36% strongly disagree). There are no significant differences in agreement level by resident demographic (i.e. gender / age).

To what extent do you agree or disagree that KCC should be planning special school places for those children who have severe and complex needs? Base: all providing a response (1,347), the sum of individual percentages may not sum to 100% due to rounding.



SUPPORTING DATA TABLE	Number of responses	Percentage
Net – Agree	674	50%
Net – Disagree	594	44%
Strongly agree	528	39%
Tend to agree	146	11%
Neither agree nor disagree	73	5%
Tend to disagree	107	8%
Strongly disagree	487	36%
Don't know	6	0%

The table below depicts the proportion of consultees who agree by the type of consultee. A significantly higher proportion of consultees responding on behalf of a mainstream primary or secondary school agree KCC should be planning special school places for those children who have severe and complex needs.

	Agree %	Disagree %
Completed as a Kent resident / residents from somewhere else / answering on behalf of a friend or relative	46%	49%
Completed on behalf of a mainstream primary / secondary school	86%	13%
Completed on behalf of a special school	43%	52%
Completed as an education professional	57%	38%

The table below compares response from consultees with children who have special educational needs and an Education, Health and Care Plan, those who do not have a Plan and consultees with children who do not have special education needs. A significantly lower proportion of consultees with children who have special educational needs and an Education, Health and Care Plan agree KCC should be planning special school places for those children who have severe and complex needs.

	Agree %	Disagree %
Children have special education needs and an Education, Health and Care Plan	41%	52%
Children have special education needs but not an Education, Health and Care Plan	50%	44%
Children do not have special education needs	64%	32%

Consultees were asked to detail their reasons for agreeing or disagreeing that KCC should be planning special school places for those children who have severe and complex needs in their own words. The comments have been reviewed and grouped into themes consistent with the process reported in the 'Points to Note' section. 92% of consultees provided a comment at this question.

The most common themes noted are as follows:

- Every child should be planned for, complex or lower level / all disabilities / those with EHCPs but lower level should be planned for / in a special setting / every child has the right to a suitable education that meets their individual needs – 36% of consultees answering
- Perception that mainstream schools are not set up to support SEND children - e.g. the resources, the building / environment, classrooms, class sizes, number of pupils – 29% of consultees answering
- Children's needs do not need to be severe / complex to be unable to cope in mainstream schools (e.g. sensory overload, moderate learning difficulties, those that mask / autistic / ADHD) – 21% of consultees answering

- Children with severe and / or complex needs should be in a specialist school setting / but not at detriment to others / why would we not agree with this – 19% of consultees answering
- Mainstream school teachers / teaching assistants are not trained or experienced to support or cope with children with special needs – 18% of consultees answering
- Some children fall between the metrics: special schools can't accept them, and mainstream schools can't support / many will be in limbo and unsupported / they must not be forgotten / will exclude certain cohorts, including those with physical disabilities – 15% of consultees answering

Please tell us the reason for your response. Base: all consultees providing a response (1,245), themes 3% and above reported below

% THEME	Number of responses	Percentage
Every child should be planned for, complex or lower level / all disabilities / those with EHCPs but lower level should be planned for / in a special setting / every child has the right to a suitable education that meets their individual needs	444	36%
Mainstream schools are not set up to support SEND children - e.g. the resources, the building / environment, classrooms, class sizes, number of pupils	360	29%
Children's needs do not need to be severe / complex to be unable to cope in mainstream schools (e.g. sensory overload, moderate learning difficulties, those that mask / autistic / ADHD)	262	21%
Children with severe and / or complex needs should be in a specialist school setting / but not at detriment to others / why would we not agree with this	239	19%
Mainstream school teachers / teaching assistants are not trained or experienced to support or cope with children with special needs	229	18%
Some children fall between the metrics: special schools can't accept them and mainstream schools can't support / many will be in limbo and unsupported / they must not be forgotten / will exclude certain cohorts, including those with physical disabilities	182	15%
If not in the right setting (or removed from special school / moved to mainstream schools) children will suffer academically / won't achieve or progress	164	13%
If not in the right setting (or removed from special school / moved to mainstream schools) children's mental health will be impacted / traumatised	160	13%
Clarification needed on what is severe / complex / who decides what is severe or complex?	143	11%
If special needs children are place in mainstream schools, then those schools should be appropriately funded / there is not enough funding for mainstream schools to be inclusive	143	11%
There aren't enough special needs places or schools / there is a huge demand / more schools should be built	126	10%

% THEME	Number of responses	Percentage
KCC have a duty / responsibility to provide support / appropriate setting for these children / it's discrimination	108	9%
Some children can be academically able but still have severe / complex needs (e.g. neuro / physical / trauma) - specialist schools won't accept them / they won't be able to attend a special school	100	8%
Children with severe and complex needs impact those without, if in a mainstream school setting: can be traumatic / disruptive for both	95	8%
If not in the right setting (or removed from special school / moved to mainstream school) there will be long-term impacts on them (and society) / impact their future and moving into adulthood	92	7%
There will be an increase in 'school refusal' / Emotionally Based School Avoidance, children not in school, being home educated, with increased pressure on parents / child refused school	74	6%
This is a cost saving measure to the detriment of the children and their families / short-sighted and will have longer term consequences	58	5%
These children have been failed in a mainstream school setting / they are in special schools because they have been failed	54	4%
Question is poorly worded / leading / misleading / ambiguous / deceptive	48	4%
Some children in special schools could be in mainstream schools / special schools should only be for those with the most complex / severe needs	46	4%
A change in designation will / could mean child's needs won't be met / these are specialist schools / do not change designation of Valence	42	3%
Children should not be moved from a special school to a mainstream school / when re-assessed	41	3%
Children with special needs in mainstream school settings are often bullied / singled out, causing trauma	40	3%
It is unfair on the children and teachers if in the wrong setting	40	3%

Example verbatims supporting comments that **every child being planned for / every child has the right to a suitable education that meets their individual needs** can be found below:

“All children have the right to be in an educational setting that allows them to fulfil their potential and have their needs, no matter how complexed, met completely.”

“It’s impossible to generalise. Greater sensitivity is needed in assessing & understanding students’ needs as academic seemingly low need students can be internally struggling and masking at great detriment. Parents need to be listened to as they know their child best. I believe through my experience that assessments are not sufficient & students suffer greatly from assumptions of need.”

“Because mainstreams simply cannot meet the needs of children with SEN within current budgets, but you need to be planning places for ALL children who require something more than mainstream education, not just those with complex or severe needs. That’s like only preparing for life-saving NHS surgeries and ignoring all other medical treatments.”

“I trained as a primary school teacher and worked as a SEN teacher. In my experience, special schools benefit the majority of children, with and without SEN. Some children with less complex needs can cope in mainstream schools, but only if they are properly staffed. The current continuing reduction in teaching and support staff across the board means that this, more often than not, is not the case. I, therefore, believe a SEN place should be available for any child who needs it, regardless of the complexity of their need.”

“School places should be available to all children, it’s the determination of those children with severe and complex needs that is the issue, and whether individuals are able to attend mainstream schools or not. Just because the numbers in other areas are lower, doesn’t make the levels in Kent wrong. There is concern that mainstream schools will struggle to support some of the children now proposed not to attend special schools and the ability and resources of special schools to support them. There is not enough detail with just the suggestions published.”

Example verbatims underpinning comments that **mainstream schools not being set up to support SEND children** can be found below:

“There are now so many SEN students in mainstream school that are struggling because there just isn’t the support for them, and your proposal will only make things worse. There needs to be more SEN provisions, not just picking and choosing which children are the ones left to struggle. Every child has a right to a GOOD education, and I feel not only is this not something that is currently provided for a lot of SEN children, but something that will be made worse if your proposal is put into place.”

“Some children with special educational needs are not getting what they need from mainstream. Mainstream us not set up for severe needs of behaviour or autism or other needs that are severe . The set up is wrong bring in a mainstream class and trying to keep up with peers. Usually when they get funding a teaching assistant is assigned, and they find these children very difficult to work with.”

“Every child with ASD or ADHD needs, complex or not should be given opportunity to be in special needs provision. Mainstream schools have very little understanding, time , facilities or even give reasonable adjustments with children who need more support.”

Example verbatims underpinning the comments of **children’s needs not needing to be severe / complex to be unable to cope in mainstream schools** can be found below:

“As a mother of a child with additional needs classed as 'non severe', and having experienced them within a mainstream setting I can safely say that needs cannot be met. This is not for the lack of trying, but from an inclusivity point of view, every child has the right to an equal education, every child is different, this isn't a one size fits all and while a mainstream may be able to cater for someone with "equal" needs, it doesn't take into account the individual needs.”

“Each case and child should be assessed as an individual. Just because KCC considers a child to be 'low need' does not mean that pupil experiences his or her disability as 'low need' and could still need the vital support and education offered by a more specialist setting.”

“There are vast number of children that do not fall under the category of severe and complex needs that would not cope with a mainstream setting or SRP. Mainstream schools are not sufficiently funded to cope with mainstream students let alone for students who have additional needs.”

Example verbatims underpinning comments that **children with severe and / or complex needs should be in a specialist school setting / but not at detriment to others** can be found below:

“Places within special schools absolutely need to be available to those with severe and complex need - they are needed desperately by children who have been let down by current EHCP systems. If discussing curriculum overhauls in mainstream education to support students with high level needs, attention must be paid to how will mainstream schools be able to adapt for a wider breadth of cohort with same funding/provisions.”

“Of course, I think KCC should be planning special needs places for those with severe and complex needs. Who doesn't?! But that shouldn't mean ignore needs of others. Loaded question.”

“As an SEN teacher having worked in a special school for over 20 years, I am passionate that young people deserve a place at an SEN school unless they are of an ability level to access learning in a mainstream school. So many of my students over the years have been traumatised by inappropriate placements at mainstream and have not coped or suffered as a result of teachers who do not have sufficient SEN training or enough time to support their individual needs. Special schools class sizes are growing to dangerous proportions.”

Example verbatims underpinning comments that **mainstream school teachers / teaching assistants are not trained or experienced to support or cope with children with special needs** can be found below:

“Mainstream schools are unable to cope with children who have complex learning needs. Classes are too big and the schools do not have enough staff to teach these children properly. Funding is also an issue for schools and a lot of Teachers and TA's are not trained to deal with SEN children.”

“I have 4 children and 3 of them have EHCP and health care plans with their school which states that they need the extra support and have smaller classes . This is obscene how you want to put our SEN children in with mainstream school the mainstream schools are not suitable for SEN children for many reasons and the staff at mainstream have not had training to help with SEN children , the teachers that are in special schools have been trained and they have the ability and patience for SEN children. I WILL NOT BE INCLUDED IN THIS PLAN!!!!!!!!!!.”

“Experience with being a teacher myself and seeing the struggles firsthand with my own grandchildren trying to get the support they need with ASD and ADHD and very different levels of need. Difficulty being able to obtain a special setting for one that requires as well as lack of training in mainstream settings to accommodate their needs.”

Example verbatims underpinning comments that **some children fall between the metrics: special schools can't accept these and mainstream schools can't support / many will be in limbo and unsupported / they must not be forgotten** can be found below:

“Children are all so different what one child needs cannot be put in a box with a label. It is such a wide range of needs, we should be choosing a school that best suits that child. You cannot always see the need a child has and they can be lost in mainstream.”

“Excluding anything but severe needs means huge numbers of children missing out on a suitable education as they will not cope in mainstream, they will be vulnerable and their mental health will be impacted. The result of this means likely more children out of school, more severe mental health problems, children not reaching their potential and becoming likely unemployed adults who will forever be reliant on the state.”

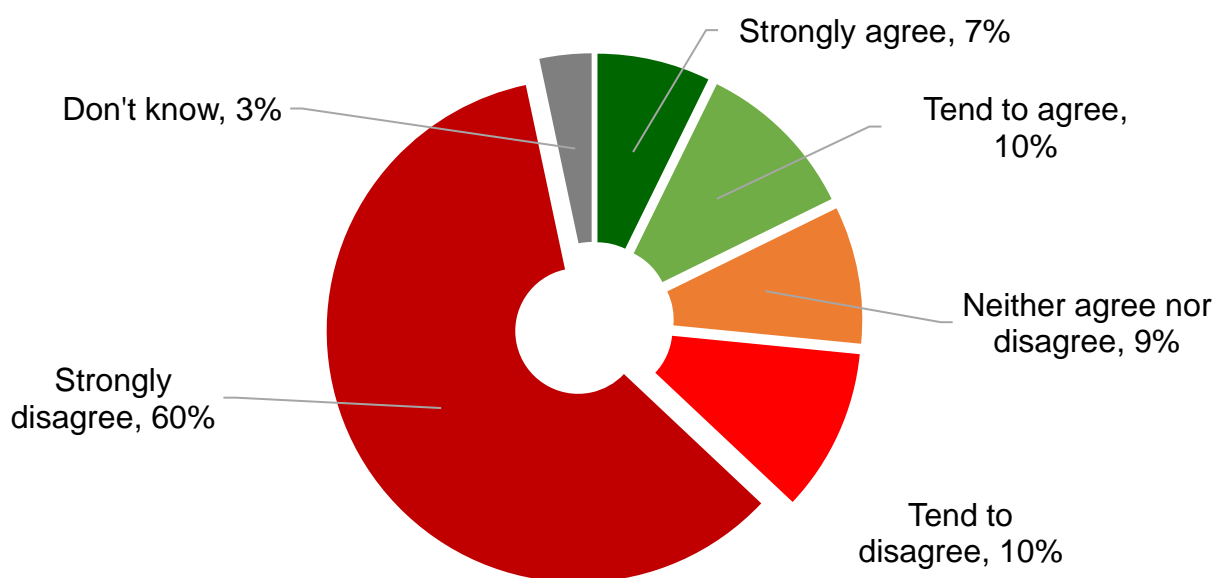
“I have an adult son with severe and complex special educational needs who could not be supported at his special school and had to leave education two years ago. Special schools need to support this cohort, they have nowhere else to go. Mainstream schools need to be supported to more inclusive and adopt a neuro affirming culture to support those with moderate educational needs who require reasonable adjustments, quite often neuro affirming approaches better support all pupils.”

Proposed designation and admission guidance

Agreement with moving to three designations for special schools

18% indicated they agree moving to three designations for special schools will enable KCC to achieve the aim of providing special school provision for children and young people in Kent with severe and complex special educational needs (7% strongly agree, 10% tend to agree³). 70% disagree with the proposed movement and the strength of disagreement is high (10% tend to disagree, 60% strongly disagree). There are no significant differences in agreement level by resident subgroup (i.e. gender / age).

To what extent do you agree or disagree that moving to three designations for special schools will enable us to achieve the aim of providing special school provision for children and young people in Kent with severe and complex special educational needs? Base: all providing a response (1,348), the sum of individual percentages may not sum to 100% due to rounding.



SUPPORTING DATA TABLE	Number of responses	Percentage
Net – Agree	239	18%
Net – Disagree	945	70%
Strongly agree	98	7%
Tend to agree	141	10%
Neither agree nor disagree	119	9%
Tend to disagree	141	10%
Strongly disagree	804	60%
Don't know	45	3%

³ 18% net agree is a rounded sum of 7% strongly agree and 10% tend to agree

The table below depicts the proportion of consultees who agree by the type of consultee. A significantly higher proportion of consultees responding on behalf of a mainstream primary or secondary school agree moving to three designations for special schools will enable KCC to achieve the aim of providing special school provision for children and young people in Kent with severe and complex special educational needs. Agreement is particularly low amongst consultees responding on behalf of a special school.

	Agree %	Disagree %
Completed as a Kent resident / residents from somewhere else / answering on behalf of a friend or relative	15%	72%
Completed on behalf of a mainstream primary / secondary school	55%	35%
Completed on behalf of a special school	3%	89%
Completed as an education professional	22%	71%

The table below compares response from consultees with children who have special educational needs and has an Education, Health and Care Plan, those who do not have a Plan and consultees with children who do not have special education needs. A significantly lower proportion of consultees with children who have special educational needs and an Education, Health and Care Plan agree moving to three designations for special schools will enable KCC to achieve the aim of providing special school provision for children and young people in Kent with severe and complex special educational needs.

	Agree %	Disagree %
Children have special education needs and an Education, Health and Care Plan	11%	76%
Children have special education needs but not an Education, Health and Care Plan	18%	64%
Children do not have special education needs	26%	60%

Consultees were asked to detail their reasons for their level of agreement that moving to three designations for special schools will enable KCC to achieve the aim of providing special school provision for children and young people in Kent with severe and complex special educational needs in their own words. The comments have been reviewed and grouped into themes consistent with the process reported in the 'Points to Note' section. 79% of consultees provided a comment at this question.

Further to the stated levels of disagreement with this movement (70% disagree in principle), the majority of comments made reference to reasons why consultees disagree with the proposal. The most common themes noted are as follows:

- Mainstream schools cannot support SEN children / my child will not cope in mainstream setting: not just about learning needs / being academically able / high functioning: anxiety /

communication / interaction / sensory / environmental / disabilities / physical / class sizes – 34% of consultees answering

- Some children will fall through the net / not meet criteria / It seems to only cater for the most severe / profound, it should be for all SEND children / including those with less complex needs / those with challenging needs – 27% of consultees answering
- Children will be impacted if removed from special setting / there for a reason / will impact their wellbeing / mental health / education / life chances / their future – 23% of consultees answering
- Removal of Communication and Interaction; Physically Disabled, Complex Medical Needs - cannot just remove 2 designations, what happens to those children, they cannot be supported in mainstream setting, e.g. C&I, PD – 17% of consultees answering
- Special schools (e.g. Valence) provide unique settings, for specific disabilities and needs, changing their designation will mean their specialism will be diluted / children will be affected / they won't be able to support all of the children if the designations are widened / OFSTED have rated the SEND provision as good / outstanding so they need to remain – 12% of consultees answering
- Oversimplifying complex needs / cannot umbrella them under one term (A child with: C&I does not mean they have severe & complex needs; a PD child may also have complex medical needs; can be neurodivergent but have array of needs; complex physical is not the same as complex medical; having severe and complex needs does not mean they also have learning difficulties etc) – 12% of consultees answering

Please tell us the reason for your response. Base: all consultees providing a response (1,065), themes 3% and above reported below

% THEME	Number of responses	Percentage
Mainstream schools cannot support SEN children / my child will not cope in mainstream setting: not just about learning needs / being academically able / high functioning: anxiety / communication / interaction / sensory / environmental / disabilities / physical / class sizes	366	34%
Some children will fall through the net / not meet criteria / It seems to only cater for the most severe / profound, it should be for all SEND children / including those with less complex needs / those with challenging needs	287	27%
Children will be impacted if removed from special setting / there for a reason / will impact their wellbeing / mental health / education / life chances / their future	249	23%
Removal of Communication and Interaction; Physically Disabled, Complex Medical Needs - cannot just remove 2 designations, what happens to those children, they cannot be supported in mainstream setting, e.g. C&I, PD	181	17%

% THEME	Number of responses	Percentage
Special schools (e.g. Valence) provide unique settings, for specific disabilities and needs, changing their designation will mean their specialism will be diluted, the children will be affected / they won't be able to support all of the children if the designations are widened / OFSTED have rated the SEND provision as good / outstanding so they need to remain	128	12%
Oversimplifying complex needs / cannot umbrella them under one term (A child with: C&I does not mean they have severe & complex needs; a PD child may also have complex medical needs; can be neurodivergent but have array of needs; complex physical is not the same as complex medical; having severe and complex needs does not mean they also have learning difficulties etc)	125	12%
This is a cost-saving measure, at the expense of vulnerable children / reassessments will be at the expense of KCC's budgets; will end up costing you money in the long run	123	12%
Need to build more special schools / provide more funding / including in-between settings	109	10%
Schools are already stretched	104	10%
Cannot mix children with different needs together: they are not the same, they require different settings, different support, different curriculums / cannot mix SEMH with PSCN - they are different cohorts and require a different approach	101	9%
Against the law / discrimination / against the Disability Act	98	9%
Why change / works well as it is / disagree/ will not be beneficial	90	8%
There needs to be training / resources / funding	86	8%
Lack of information: no evidence to support these changes / where is the funding coming from / how has this been costed / no other counties have adopted this - where else has this worked well? Shows a lack of knowledge	74	7%
Academically-able autistic children appear to have been excluded / autistic children need specialist autistic schools, they cannot be lumped in with other neurodivergent children	68	6%
Children are individual and should be assessed individually	68	6%
Could be too broad / including for neurodiverse / definitions open to interpretation / needs clearer definitions	57	5%
Will result in school refusal / children out of education / home schooling (which will impact the parents - stress, financial, fines from LA)	55	5%
Changing designation doesn't change the need for places / just moves the gaps around	50	5%
Autism is referenced in all 3 / what about those who fit all across all 3 designations / co-occurring - how will they be supported?	43	4%
Will help to streamline / simplify the system / makes it clearer	41	4%

% THEME	Number of responses	Percentage
Will help more children (including hidden disabilities / children are being refused places due to narrow admissions criteria / not fitting the tick boxes / finding a better fit (including more local) school	35	3%
Seems sensible / sounds good in principle / for clear cut cases	30	3%
As long as the impact on all children is considered, e.g. neurotypical in MS schools	29	3%

Example verbatims underpinning comments that **mainstream schools cannot support SEN children / my child will not cope in mainstream setting: it's not just about learning needs / being academically able / high functioning** can be found below:

“Having gone to a large Comprehensive School which catered for both mainstream and ‘Inclusive Learning’, I have witnessed firsthand how lack of required care, knowledge and time can impact children with even the ‘mildest’ forms of disability. when put into an environment which isn’t safe nor suitable for them, these children learn to shrink and shy away from engaging with the wider world and become alienated by it. The need for more SEND schools in the Kent area is not only to house and educate these children, but to provide a better quality of life and childhood and one which is actually equitable with that of a typical child in mainstream education. This includes empathetic teaching, friendship & companionship and opportunity to experience/engage with the outside world in a way which doesn’t marginalise them for being different. The government, on local and national level have a duty of care to these children and their families and should rise to the responsibility of putting safety nets in place to help them, rather than obsessing over streamlining and efficiency for the sake of admin and logistics.”

“Children have many different needs - our mainstream schools are too big to accommodate physical needs. It sounds like those children who are academically able will have to fit in mainstream schools without managing their wellbeing and neurological needs. It would be great for a community to have all schools to meet all needs but it is not possible as not all need types cannot be accommodated in the same classes.”

“I strongly disagree to the 3 categories. These suggestions means that the pupils in our school would be in mainstream. The majority of our students have come from mainstream and have not been successful. The specialised support, specialist building, trained professionals and the environment is the only reason our students are successful and that they are accessing the curriculum. I am concerned that KCC have not evidenced that any other county in the country has proposed this and therefore there is no evidence of success. KCC have also selected our pupils themselves and have placed them into our school, so the LA believe that these students should be here and need our support to access education. I have taught in a mainstream school for 5 years, and now in SEN for over 5 years and my teaching and support I give is completely different. There are teachers in mainstream that are so over welcomed trying to differentiate and support all 30 students in one class with a range of SEN, if you then add the pupils I currently teach in a C&I school, they would not be able to teach and develop all students, you would lose teachers in the profession when this is already happening. Finally, our pupils are so incredibly vulnerable, if they are not supported at school/in education or at home, this is a massive

safeguarding concern for me. As a DSL, I am really concerned about the students' safety, their futures, and how KCC thinks this will work for our cohort of pupils."

"You cannot send a child with special/complex needs to a mainstream school. Although there may be a unit for SEN the benefits are next to none for the child involved. The bullying for one is absolutely horrendous, a child gets given a place in a specialist school for a reason; to be able to be the best they can be with the support and help they need. Many children with special needs could not cope in mainstream and is the whole reason they have been placed in a special setting in the first place. Medical needs are not suited for a mainstream school the slightest. You are letting EVERY DISABLED CHILD DOWN AND PUTTING THEM AT RISK."

Example verbatims underpinning comments that **some children will fall through the net / not meet criteria / it seems to only cater for the most severe / profound, it should be for all SEND children / including those with less complex needs / those with challenging needs** can be found below:

"3 designations is not enough. You're trying to save money by reducing the number of children in special schools regardless of what's in their best interests. The current pathway seems a good balance, slimming them down is just narrowing the number of children who can access that special support and grouping children together with different needs will surely make it harder for the schools to support the children. You can't force children with C&I difficulties into a mainstream environment to save money when the children may become isolated from peers because they can't communicate and interact in the same way neurotypical children can and need more support."

"KCC are wiping out an entire need of children with communication and interaction needs. Just because they do not have severe learning needs as well, this does mean they are anymore able to attend a mainstream setting. The fact that this is even being discussed shows how very little KCC understands about academic ability and a crippling debilitating need. There is a reason children who are neurodiverse with communication and interaction needs, who can achieve academically, are in these schools, some have been out of school for 3 years or more. But because they are verbal and can achieve some (not to their potential) KCC believe they can be thrown to the wolves in mainstream. It is not ok, and not inclusion."

"Recognition there has to be change, however the current designations provide breadth of offer to meet the diverse needs of the pupils with SEND in Kent. By narrowing this model, it will limit progress for pupils. If there are only three special school designations and more children are in mainstream I believe we will see unintended consequences, such as: - an increase in children coming out of mainstream schools due to increased social anxiety, lack of inclusion from schools, families and communities and school placement breakdowns, leading to attendance and PA, - an increase in tribunals by families who are exhausted and frustrated by a system that is not keeping children central, - an increase in placements in the independent sector as the 3 designations will not be able to successfully meet the needs of pupils and /or a shortage of places in the maintained sector."

"Many reasons.... but the overarching consideration must be what is best for the child. The proposal reducing the number of designations demonstrates a fundamental

misunderstanding of SEN children and their experiences in educational establishments. There should be more designations, not less. KCC appear to want to prioritise complex needs only and using this proposal to do so. All SEN children with EHCPs require a suitable designation not a broader, more ambiguous designation that risks watering down needs.”

Example verbatims underpinning comments that **children will be impacted if removed from special setting / there for a reason / will impact their wellbeing / mental health / education / life chances / their future** can be found below:

“This would have a detrimental effect on all children. I have a son who comes under Communication & Interaction with Learning Difficulties he is severely behind in all areas but would not be classified under your proposed guidelines as being severe enough. He is not violent but that does not mean it doesn’t have a massive impact on all aspects of his life. If my son was to become violent and aggravated because he is unable to do the work, under your proposed new rules he would gain a place in a specialist school. But because he doesn’t do that, and his emotions show through stress and anxiety he wouldn’t be able to access an education like he should.”

“So, the solution is to take 2 groups out who currently the law agrees, require a special educational setting and shove them back into mainstream? No this is utterly mad and will damage those children and their life chances. It is a heinous act of unspeakable cruelty, short sightedness and likely to be illegal.”

“There is no thought to the anxiety young people who are neuro diverse will suffer being placed in mainstream school. There is no account for the sensory needs these children have. The link between ADHD, ASD and ODD is not being accounted for, placing young people in an unsuitable setting will cause more school refuses, more mental health issues and greater behavioural outburst because of needs not being met or recognised.

When training as a teacher there is no requirement to have placement in a SEND school to gain a far deeper understanding of neuro diverse young people.”

“I don’t believe that KCC are thinking of the bigger picture, or the long term implications on those children who will no longer receive a place in a setting where they can be properly supported by members of staff with great experience in SEN. having worked in a mainstream primary, and secondary school I have seen first-hand how misunderstood the children with SEN are, and how their behaviours are not understood adequately, nor do staff have the training or time.”

Example verbatims underpinning comments that **removal of Communication and Interaction; Physically Disabled, Complex Medical Needs - cannot just remove 2 designations, what happens to those children, they cannot be supported in mainstream setting** can be found below:

“Simplifying the designation system from five to three categories seems to prioritize administrative efficiency over the specific needs of students. Merging categories like 'Physical Disability' and 'Communication & Interaction' overlooks the unique challenges

faced by those student groups. There's also a concern about the impact on existing schools. Perhaps maintaining the current system with more granular sub-categories within each designation could be a more effective solution.”

“Many neurodivergent children have communication and interaction needs that mean they cannot manage in mainstream. By conflating these two you do not adequately differentiate around this important need. Neurodivergent conveys a massive spectrum of need. Your model is too simplistic and masks the fundamental need.”

“I strongly disagree with the proposal to move to three designations for special schools, particularly concerning the elimination of the "Communication & Interaction" or "Communication & Interaction with Learning Difficulties" designations. My concern is for ASC students with higher IQs who will not cope in mainstream settings and will be disadvantaged by being unable to gain a place at these schools anymore. This proposal appears to be a cost-saving measure aimed at reducing the number of children in specialist settings, which is deeply concerning. Here are the key points to consider: 1. ****Inadequate Support for ASC Students****: Higher-functioning ASC students often face significant challenges in mainstream settings due to sensory sensitivities, social interaction difficulties, and the need for specialized teaching approaches. Eliminating the specific designation for communication and interaction issues fails to address the unique needs of these students, potentially denying them the support necessary for their success. 2. ****Legal Requirements****: Under the Children and Families Act 2014, Local Authorities are mandated to identify and meet the needs of children with SEND through Education, Health, and Care Plans (EHCPs). Additionally, the Equality Act 2010 requires reasonable adjustments to prevent discrimination against disabled students. Simplifying designations may result in these legal obligations not being fully met, especially for neurodivergent students without significant learning difficulties. 3. ****Impact on Families and Children****: The stress on families trying to secure appropriate educational placements for their children can be immense. My personal experience includes severe distress faced by my son in a mainstream school, leading to a suicide attempt. Policies that fail to recognize and cater to individual needs can have devastating consequences for both children and their families.”

“Communication should be its own designation because within that falls so many issues these children face daily and should not be grouped together with others. With 5 designations more specialist teachers are used to the best of their ability rather than being stretched to 3.”

Example verbatims underpinning comments that **special schools (e.g. Valence) provide unique settings and that changing their designation will mean their specialism will be diluted / children will be affected / they won't be able to support all of the children if the designations are widened** can be found below:

“I do not believe there is any evidence base to support this decision. I am particularly concerned about pupils in C&I designated schools. They have been placed in these schools because mainstream placements have failed them. I believe (and have had experience of!) these pupils will become non-attenders due to extreme school-based anxiety, leading to significant mental health difficulties before they have been placed in the correct provision

(C&I special schools). If these provisions are not available, there will be significant numbers of young people out of education and subsequently the workforce.”

“After the last KCC Ofsted, it was highlighted how strong the special education system was working under the 5 designation system, by changing this the impact will be negative upon the children, causing a detrimental effect upon both education and mental health.”

“Not ALL severe and complex needs relate to learning and some arise entirely from physical needs difficulties/complex medical needs (PD/CMN). Valence school offers opportunities that are not available elsewhere. The specialist staffing and inclusive environment, giving opportunities that are simply not available in mainstream provision. My daughter attends Valence as no mainstream school or private setting would take her as her medical needs are too complex. Without Valence she could not access the curriculum the same as any other teenager. Changing Valence school would take away her access to this education and she is just one of many children like this.”

“This conflates learning difficulties with C & I difficulties, which doesn't appreciate where these challenges lay. Thomas does not have learning difficulties, he suffers acutely with C & I difficulties - if the C & I difficulties are not overcome he would not be learning at all, in a classroom at all, or an active member of society paying his taxes when he grows up. By changing the designations in this way, it shows a lack of understanding of what these schools are good at, who they are helping and why.”

Example verbatims underpinning comments that it is **oversimplifying complex needs / cannot umbrella them under one term** can be found below:

“Specialist schools have specific skills sets and trained staff in specific areas of need but having an umbrella term will dilute the expertise, confuse the purpose of the child needing specialist provision and mean that children are missing out on a bespoke area of need which can mean the difference nets them achieving or not. This would limit the children needing specialist education, put even more pressure on already struggling mainstream schools and this would cause more future problems than are apparent now.”

“Children should be able to be educated in the area in which they live and should have access to special school provision that will meet their needs within that area. Moving to 3 descriptors will not ensure that the right provision is selected for children. They are too broad which means that children will be placed in schools that are not suitable. This will lead to further training and costs related to adapting existing buildings when the intention is to reduce deficit. Or more likely children will not be in the correct provision. There is also some concern over NLD designation as this is not a recognised medical condition.”

“I do not think that changing to three designations instead of five would in any way help provide special school provision for those children with severe and complex special educational needs, as amalgamating these categories does not reflect the nuance and specificity that complex needs necessarily demand. In making the groupings broader, students will not be grouped in ways that accurately reflect their needs and competition for places at these provisions will be far greater due to the wider range of students that will be eligible to apply for a place. The current designations work well and are effective and I see

no benefit to the children of Kent through changing them, and it is clear this proposition is fiscal as opposed to advocating for their welfare.”

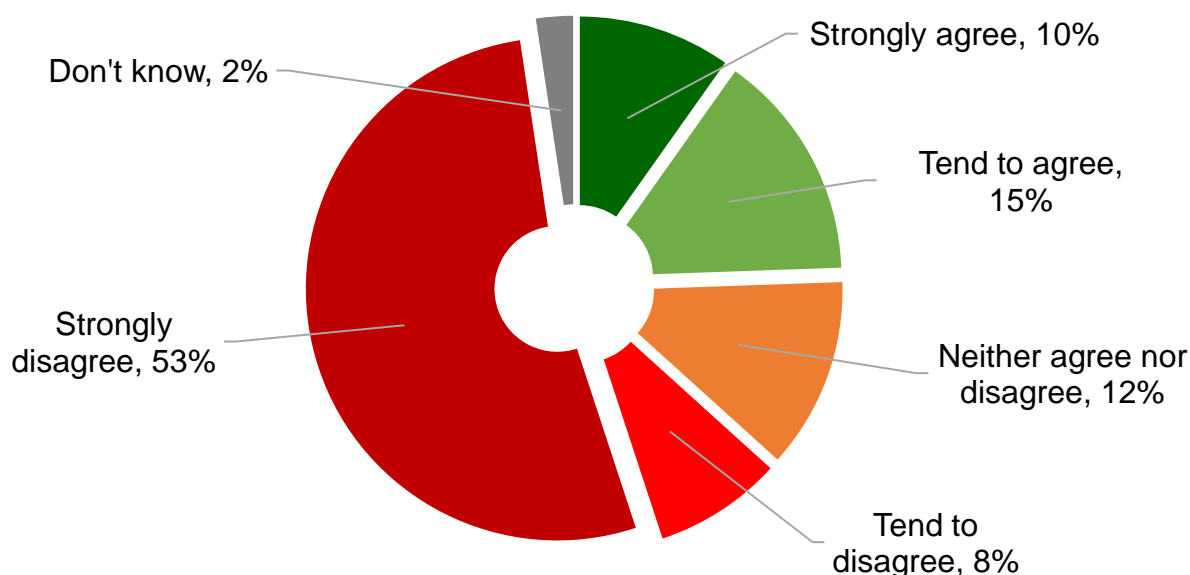
Proposed implementation

Agreement with graduated approach to the change over time

(KCC proposes to implement a graduated change starting from September 2026. From this date, the new designation and admission guidance would apply to children and young people requesting special school places. Those already attending a special school will remain enrolled at that school, subject to the annual review process as per the current statutory requirement. This suggested approach would result in a gradual change over time, year by year.)

24% indicated they agree with the proposed graduated approach to the change over time (10% strongly agree, 15% tend to agree⁴). 61% disagree with the proposed approach and the strength of disagreement is quite high (8% tend to disagree, 53% strongly disagree). There are no significant differences in agreement level by resident subgroup (i.e. gender / age).

To what extent do you agree or disagree with this graduated approach to the change over time? Base: all providing a response (1,346), the sum of individual percentages may not sum to 100% due to rounding.



SUPPORTING DATA TABLE	Number of responses	Percentage
Net – Agree	329	24%
Net – Disagree	820	61%
Strongly agree	132	10%
Tend to agree	198	15%
Neither agree nor disagree	165	12%
Tend to disagree	111	8%
Strongly disagree	709	53%
Don't know	32	2%

⁴ 24% net agree is a rounded sum of 10% strongly agree and 15% tend to agree

The table below depicts the proportion of consultees who agree by the type of consultee. A significantly higher proportion of consultees who completed the questionnaire on behalf of a mainstream primary or secondary school agree with the proposed graduated approach to change over time. Agreement is particularly low amongst consultees responding on behalf of a special school.

	Agree %	Disagree %
Completed as a Kent resident / residents from somewhere else / answering on behalf of a friend or relative	21%	64%
Completed on behalf of a mainstream primary / secondary school	60%	27%
Completed on behalf of a special school	11%	75%
Completed as an education professional	28%	54%

The table below compares response from consultees with children who have special educational needs and has an Education, Health and Care Plan, those who do not have a Plan and consultees with children who do not have special education needs. A significantly lower proportion of consultees with children who have special educational needs and an Education, Health and Care Plan agree with the proposed graduated approach to change over time.

	Agree %	Disagree %
Children have special education needs and an Education, Health and Care Plan	17%	69%
Children have special education needs but not an Education, Health and Care Plan	27%	56%
Children do not have special education needs	35%	50%

Consultees were asked to detail their reasons for their level of agreement with the proposed graduated approach to the change over time in their own words. The comments have been reviewed and grouped into themes consistent with the process reported in the 'Points to Note' section. 77% of consultees provided a comment at this question.

Further to the stated levels of disagreement with this movement (61% disagree in principle), the majority of comments made reference to reasons why consultees disagree with the proposal. The most common themes noted are as follows:

- Children must not be disrupted / moved from their current specialist setting / will really struggle if transitioned to mainstream schools / cause trauma / anxiety / they're there for a reason – 23% of consultees answering
- Citing the changes must not go ahead / do not agree to any of this – 22% of consultees answering
- Belief there is not enough time to get everything in place / huge changes to settings / infrastructure / resources / recruitment / training – 13% of consultees answering

- Perceptions that the annual review cannot be an excuse to place children in a mainstream setting / underhand way of moving children to a mainstream setting / if they're doing well it's because they're in the right setting – 12% of consultees answering

Please tell us the reason for your response. Base: all consultees providing a response (1,036), themes 3% and above reported below

% THEME	Number of responses	Percentage
Children must not be disrupted / moved from their current specialist setting / will really struggle if transitioned to mainstream schools / cause trauma / anxiety / they're there for a reason	240	23%
This must not go ahead / do not agree to any of this	231	22%
This is not enough time to get everything in place / huge changes to settings / infrastructure / resources / recruitment / training	139	13%
The annual review cannot be an excuse to place children in a mainstream setting / underhand way of moving children to mainstream setting / if they're doing well it's because they're in the right setting	125	12%
If placed in mainstream setting will impact on education / future opportunities and adult life	104	10%
This is about saving money / about the safety valve agreement	98	9%
ALL children need to be catered for, not just severe / complex - all disabilities / neurodiversity / hidden disabilities / children will end up forced into mainstream / not fit any criteria	95	9%
More information / clarity needed / no evidence of model in practice / lacks substance	88	8%
Gradual is best for everyone - parents / children / schools - allowing time to adjust	88	8%
Will cause a lot of stress / anxiety / uncertainty to children and families	87	8%
Mainstream schools cannot support SEN children / physical environment / resources	85	8%
This does not have the children's best interests at heart / this will fail children	78	8%
There will not be enough funding to implement the changes needed / will require huge investment / how is this going to be funded?	75	7%
Assessments / ECHPs / placements need to be made quicker / stop making it difficult to access support and placement, children need to be in an education setting, not waiting	69	7%
There should be more special schools / places / needs more funding for special places	67	6%
If this has to happen then it does need to be gradual	66	6%
Lack of teachers / unqualified for SEN teachers / Teaching Assistants / already in crisis with recruitment and retention	65	6%

% THEME	Number of responses	Percentage
Mainstream schools are already stretched / under pressure / struggling	45	4%
This will result in more tribunals	44	4%
Cannot expect specialist teachers to teach a broader spectrum of needs / their specialism will become diluted / impact children	40	4%
Cannot mix different SEN needs children with one another / they have different needs and therefore different requirements	34	3%
This is discriminatory / unlawful	34	3%
More children will end up out of school / Emotionally Based School Avoidance / having to be homeschooled	32	3%
Agree it needs to be gradual but still do not agree to the proposals	31	3%

Example verbatims underpinning comments that **children must not be disrupted / moved from their current specialist setting / will really struggle if transitioned to mainstream schools / cause trauma / anxiety / they're there for a reason** can be found below:

“I strongly disagree .This whole change seems entirely motivated by financial difficulties and little to do with meeting real needs of SEND children. Changing the needs to fit a budget may result in catastrophic consequences for the entire overstretched education system and SEND children and their families and may result in longer term far reaching needs that will need to be met and paid for, some of which will be caused by such changes and long term disruption to their education and mental health.

“The idea that a child who has complex needs but has shown an improvement in certain areas could be removed from their school could only have been thought up by somebody who does not have a child who needs to attend a specialist provision. To remove a child from everything they know and drop them into a mainstream primary will have catastrophic consequences.”

“Do NOT move current children from their current placements, they are successful due to the placement. This needs to be phased in carefully and with ALL stakeholders onside and invested. Children currently in placements have worked hard to get there, to remove them would be disastrous.”

“There are already many children out of school or struggling in a mainstream setting and crying out for a specialist approach that only well-trained staff with experience around their specific needs would help. I do not see how making more children go to mainstream would help. Even the mainstream schools are saying they are struggling to cope with a lot of kids with echo’s. Then they end up on broken timetables and separated from the other children. Some refuse to even attend school. It’s already a major crisis. That is if you are one of the lucky ones to even get an EHCP for your child!”

“No matter how gradual this so-called change will be, these children wouldn't understand the reasons they are being moved and suddenly in a school with loads of children who don't understand them, in a broken education system who isn't designed for their needs.”

Example verbatims underpinning comments that **the changes must not go ahead / do not agree to any of this** can be found below:

“I do not agree that these changes should be implemented as children with SEN who would benefit from an SEN school place as much as the next child but who does not have 'severe and complex needs' will be discriminated against in favour of children who do.”

“There is no need for these changes which won't be helpful for these children . A gradual change doesn't help this.”

“This is difficult to answer as I wholeheartedly disagree with the proposal. A graduated approach I think will be very difficult administratively and will result in inequity of provision as there will be a mix and mismatch of children in schools.”

“The Special Schools Review is a poorly conceived plan that risks undermining the quality of education and support for children with SEN in Kent. I oppose any kind of implementation of these inadequately funded changes that have a focus on financial considerations over educational needs.”

Example verbatims underpinning comments that **there is not enough time to get everything in place / huge changes to settings / infrastructure / resources / recruitment / training** can be found below:

“September 2026 is far too soon for mainstream schools to prepare, rebuild, retrain and adapt. Our mainstream schools are oversubscribed, under equipped, understaffed and underfunded, as are many specialist provisions. In the midst of a teacher recruitment and retention crisis, adding to the burden already on both mainstream and specialist schools by reducing their autonomy in regard to the students they admit is unfeasible.”

“The devil is in the detail. It takes time to nurture school to school relationships, so it makes sense to roll it out slowly but honestly, that doesn't seem like a gradual rollout given there is a hard date in place for the changes to come into place for all school children from that date. How is this gradual?”

“How can you expect a gradual approach to change to benefit anyone? This is a particularly bias question included to trip people up. There cannot be a timeframe placed upon this type of approach as it would be unfair on individuals who require specialist settings in the future. Educational establishments would need to provide and pay for additional resources including teachers and support staff and with severely depleted funds already given to schools how on earth can KCC expect schools to be able to pay for this on top of any changes to their facilities to cater these needs.”

“It's too soon - even if this proposal does go through, how is there time for the mainstream schools to make the necessary adaptations in time and for the necessary funding to be processed to make those changes?”

“These changes are expected in 2026. This will mean that children with more medical / different complex needs will begin to be admitted to this school whilst children who are currently catered for will not have any provision locally. In effect, our current pupils will be

schooled alongside children with quite different needs putting pressure on both students and teaching staff alike. The very small size of the classrooms (under DFE guidance), the accessibility of the site (we have no accessible areas for wheelchair users or people with limited mobility) and the sheer scale of how unsuitable the building & the site is for pupils with sensory impairments and medical needs leads us to believe that the change of designation would be unsuitable for both the current pupils and any new designated pupil.”

Example verbatims underpinning comments that **the annual review cannot be an excuse to place children in a mainstream setting / underhand way of moving children to mainstream setting / if they're doing well, it's because they're in the right setting** can be found below:

“What is the most concerning part of this is those with EHCP’s in a special school could potentially be sent to a mainstream school after an annual review.”

“The fact that you are saying children can be given a school place and still technically have it revoked year on year so that every EHCP review becomes a time of enormous anxiety for the child and parent is untenable.”

“This process does not take all of the factors in mind. An annual review will become a fearful subject as if their SEN child is progressing, they risk moving onto a mainstream school and uprooting their child's educational life.”

“All special school parents are now worried that their child will suddenly not meet the criteria of the new designations and then be removed from their special school and placed in a mainstream school. Most children who were thought to be able to cope in a mainstream setting, have already tried it and failed. It's just another worry in a bucket load of worries for SEN Parents. You've fought to get your child their SEN school place and now may have it taken away at the review where the goalposts have been moved.”

Proposed school-to-school model of support

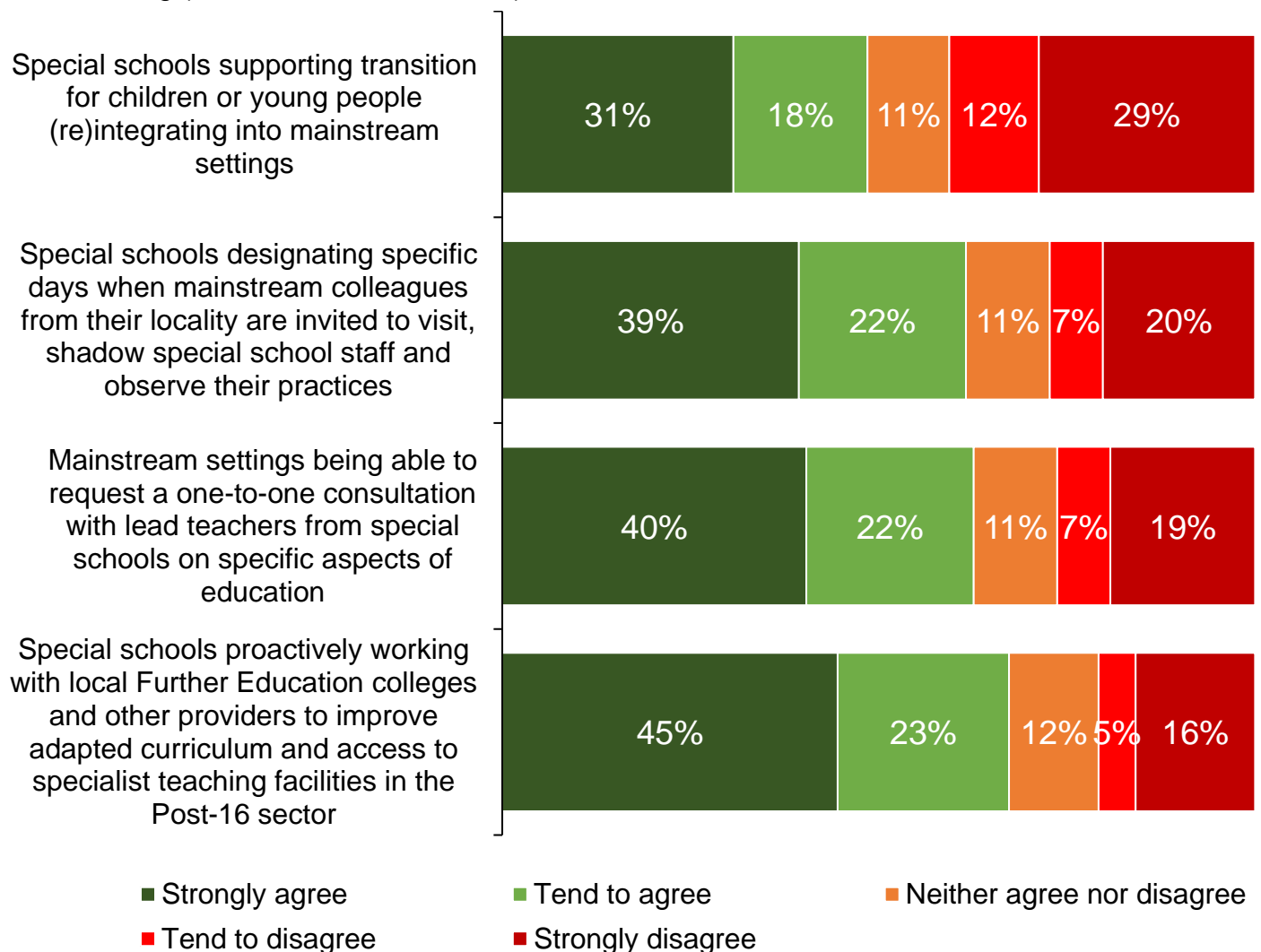
Agreement with prompted actions being part of the model

Four actions were put forward to consultees to understand agreement with the proposed school-to-school model. The agreement levels with each of these is shown below (ranked from highest to lowest agreement):

- ‘Special schools proactively working with local Further Education colleges and other providers to improve adapted curriculum and access to specialist teaching facilities in the Post-16 sector’ - 68% agree, 20% disagree
- ‘Mainstream settings being able to request a one-to-one consultation with lead teachers from special schools on specific aspects of education’ – 63% agree, 26 disagree
- ‘Special schools designating specific days when mainstream colleagues from their locality are invited to visit, shadow special school staff and observe their practices’ – 62% agree, 27% disagree
- ‘Special schools supporting transition for children or young people (re)integrating into mainstream settings’ – 49% agree, 40% disagree

A higher proportion of resident consultees aged 18-34 agreed with all model parts.

If Kent were to adopt the proposed school-to-school model of support, please tell us to what extent you agree or disagree with the following actions being part of the model? Base: all answering (varies for each statement)



Special schools supporting transition for children or young people (re)integrating into mainstream settings

SUPPORTING DATA TABLE	Number of responses	Percentage
Net – Agree	653	49%
Net – Disagree	535	40%
Strongly agree	410	31%
Tend to agree	243	18%
Neither agree nor disagree	148	11%
Tend to disagree	154	12%
Strongly disagree	381	29%

Special schools designating specific days when mainstream colleagues from their locality are invited to visit, shadow special school staff and observe their practices

SUPPORTING DATA TABLE	Number of responses	Percentage
Net – Agree	825	62%
Net – Disagree	360	27%
Strongly agree	524	39%
Tend to agree	301	22%
Neither agree nor disagree	153	11%
Tend to disagree	92	7%
Strongly disagree	268	20%

Mainstream settings being able to request a one-to-one consultation with lead teachers from special schools on specific aspects of education

SUPPORTING DATA TABLE	Number of responses	Percentage
Net – Agree	842	63%
Net – Disagree	346	26%
Strongly agree	541	40%
Tend to agree	301	22%
Neither agree nor disagree	150	11%
Tend to disagree	89	7%
Strongly disagree	257	19%

Special schools proactively working with local Further Education colleges and other providers to improve adapted curriculum and access to specialist teaching facilities in the Post-16 sector

SUPPORTING DATA TABLE	Number of responses	Percentage
Net – Agree	905	68%
Net – Disagree	272	20%
Strongly agree	601	45%
Tend to agree	304	23%
Neither agree nor disagree	154	12%
Tend to disagree	64	5%
Strongly disagree	208	16%

The tables below depicts the proportion of consultees who agree by the type of consultee. A significantly higher proportion of consultees who completed the questionnaire on behalf of a mainstream primary or secondary school agree with all four of the model parts. Agreement with all four model parts is particularly low amongst consultees responding on behalf of a special school.

Special schools supporting transition for children or young people (re)integrating into mainstream settings	Agree %	Disagree %
Completed as a Kent resident / residents from somewhere else / answering on behalf of a friend or relative	48%	41%
Completed on behalf of a mainstream primary / secondary school	75%	20%
Completed on behalf of a special school	31%	55%
Completed as an education professional	53%	37%

Special schools designating specific days when mainstream colleagues from their locality are invited to visit, shadow special school staff and observe their practices	Agree %	Disagree %
Completed as a Kent resident / residents from somewhere else / answering on behalf of a friend or relative	61%	28%
Completed on behalf of a mainstream primary / secondary school	82%	11%
Completed on behalf of a special school	47%	36%
Completed as an education professional	62%	25%

Mainstream settings being able to request a one-to-one consultation with lead teachers from special schools on specific aspects of education	Agree %	Disagree %
Completed as a Kent resident / residents from somewhere else / answering on behalf of a friend or relative	64%	26%
Completed on behalf of a mainstream primary / secondary school	84%	9%
Completed on behalf of a special school	47%	37%
Completed as an education professional	60%	24%

Special schools proactively working with local Further Education colleges and other providers to improve adapted curriculum and access to specialist teaching facilities in the Post-16 sector	Agree %	Disagree %
Completed as a Kent resident / residents from somewhere else / answering on behalf of a friend or relative	68%	21%
Completed on behalf of a mainstream primary / secondary school	80%	5%
Completed on behalf of a special school	59%	24%
Completed as an education professional	61%	22%

The table below compares response from consultees with children who have special educational needs and have an Education, Health and Care Plan, those who do not have a Plan and consultees with children who do not have special education needs. A significantly lower proportion of consultees with children who have special educational needs and an Education, Health and Care Plan agree with all four model parts.

Special schools supporting transition for children or young people (re)integrating into mainstream settings	Agree %	Disagree %
Children have special education needs and an Education, Health and Care Plan	43%	46%
Children have special education needs but not an Education, Health and Care Plan	52%	36%
Children do not have special education needs	57%	34%

Special schools designating specific days when mainstream colleagues from their locality are invited to visit, shadow special school staff and observe their practices	Agree %	Disagree %
Children have special education needs and an Education, Health and Care Plan	58%	31%
Children have special education needs but not an Education, Health and Care Plan	65%	23%
Children do not have special education needs	65%	25%

Mainstream settings being able to request a one-to-one consultation with lead teachers from special schools on specific aspects of education	Agree %	Disagree %
Children have special education needs and an Education, Health and Care Plan	60%	29%
Children have special education needs but not an Education, Health and Care Plan	66%	25%
Children do not have special education needs	70%	21%

Special schools proactively working with local Further Education colleges and other providers to improve adapted curriculum and access to specialist teaching facilities in the Post-16 sector	Agree %	Disagree %
Children have special education needs and an Education, Health and Care Plan	65%	24%
Children have special education needs but not an Education, Health and Care Plan	73%	20%
Children do not have special education needs	74%	17%

Consultees were asked to note any suggestions of what else could be included in the school-to-school model in their own words. The comments have been reviewed and grouped into themes consistent with the process reported in the 'Points to Note' section. 56% of consultees provided a comment at this question.

The most common themes noted are as follows:

- Lack of teacher resource / teacher time: will need additional resources / stretched as is / staff will not be able to do this in addition to current roles / not at detriment to their day duties (both SEN and mainstream) / teachers already under huge pressure / already struggling with staff recruitment and retention / will not be able to manage a class of 30 if one SEN child needs attention / all children will lose out / would need to be more 1-2-1 support – 36% of consultees answering
- There's a reason children are in a specialist setting, they must stay there / build more special schools / mainstream schools cannot provide this support – 23% of consultees answering
- There would need to be SEN trained staff in mainstream settings / robust training, e.g. Attention Autism is not sufficient / it takes years to train staff in SEN – 20% of consultees answering
- Funding: where is the funding for this? This will need funding / investment – 19% of consultees answering

If you have any suggestions for what else should be included in the school-to-school model, please tell us. Base: all consultees providing a response (752), themes 3% and above reported below

% THEME	Number of responses	Percentage
Lack of teacher resource / teacher time: this will need additional resources / stretched as is / staff will not be able to do this in addition to current roles / not at detriment to their day duties (both SEN and mainstream) / teachers already under huge pressure / already struggling with staff recruitment and retention / will not be able to manage a class of 30 if one SEN child needs attention / all children will lose out / would need to be more 1-2-1 support	272	36%
There's a reason children are in a specialist setting, they must stay there / build more special schools / mainstream schools cannot provide this support	173	23%
There would need to be SEN trained staff in mainstream settings / robust training, e.g. Attention Autism is not sufficient / it takes years to train staff in SEN	151	20%
Funding: where is the funding for this? This will need funding / investment	141	19%
The physical environment will need adapting / investment into the infrastructure: classrooms / sensory / this couldn't work without changes to the environment	73	10%

% THEME	Number of responses	Percentage
Needs a holistic approach: It's more than just the curriculum: relaxed uniform policy, class sizes, provision of care suites, sensory rooms, breakout rooms, physiotherapists, protocols, well-being teams, eating difficulties, stimming, lesson attendance	73	10%
Better understanding of SEN in mainstream / there is a huge lack of understanding, e.g. on managing behaviour	72	10%
Collaborations, cooperation and support: should be happening (anyway) / between all schools, mainstream or SEND, with dedicated key contacts	70	9%
More information needed / what about external agencies/ what about LIFT / more clarity needed / evidence of what this actually looks like / needs to be costed	68	9%
2026 is too ambitious / this will need a lot of careful and robust planning, including risk assessments before it can be implemented / all very good in theory	63	8%
Disagree, do not go ahead with this, this is not in the interests of the children, it's about saving money	53	7%
There should be SEN provision in mainstream schools as standard / a SEN rep on the board of governors, with or without SEN children / mainstream schools should be set up for SEN	52	7%
Some of this already happens, KCC just don't know about it / we already do this	50	7%
There would need to be support and advice on transition and re-integration	42	6%
Model / define what inclusive / best practice looks like, including the environment, pastoral care, personal care, mental health	37	5%
A 2 way approach - specialist schools / teachers sharing and learning with MS schools and vice versa	34	5%
STLS: use / keep / extend STLS posts / STLS provide this / does this mean that STLS will be disbanded/ where will it fit?	31	4%
Special schools staff visiting mainstream schools to help them identify strategies to implement	26	3%
School-to-school support would need to be specific and followed up / audited and reviewed / independent body auditing the process	24	3%
SEND should be taught at PGCE level / during teacher training and during work experience for teachers / TAs	24	3%
Support for parents and children, involve them, listen to them	19	3%

Example verbatims underpinning comments that **lack of teacher resource / teacher time: will need additional resources / stretched as is / staff will not be able to do this in addition to current roles / already struggling with staff recruitment and retention / will not be able to manage** can be found below:

“On paper this looks a great idea but in practice this won’t work. Lots of years of training and experience is needed to help support special needs children. The profession is lacking teachers in all sectors, people are leaving this profession. You are putting extra pressures on teachers without the extra support that is needed for these children. You may be able to differentiate work etc but you don’t have enough staff in mainstream schools.”

“As a special school we are already committed to working openly in our community based on a school to school model, however this is not sustainable as a model moving forward with the level of SEND need in the locality. We have the skills and expertise and would be happy to continue to offer this but it must be a funded provision and cannot be replacing the quality of provision for the children in special schools. Children in special schools are already compromised and do not receive an equitable offer to mainstream children, e.g. reduction/non-existent specialist teaching areas to accommodate more children.”

“Mainstream schools have already expressed their concerns that they will not be able to provide the support required, as mentioned in your document during the consultations. Resources are already spread thinly, how will staff find the time to offer this school-to-school support.”

“I do worry about time. Where are teachers going to find the time for this? Specifically, the teachers in mainstream school? Or is it something that looks good on paper and is only delivered to the leaders and so the teachers that are actually in the classroom never see benefit from? It is badly thought through.”

Example verbatims underpinning comments that **there's a reason children are in a specialist setting, they must stay there / build more special schools / mainstream schools cannot provide this support** can be found below:

“Children in specialist should NOT be integrated or re-integrated to mainstream. They are in specialist for a reason. If parents wish to move their children, they can already do this at annual review. Children in specialist primary should naturally transition to specialist secondary. School to school support is a good idea but absolutely not if it means well supported children in special education are moved to mainstream against the child’s and parents’ wishes.”

“They are in a special needs school for a reason, they should be left there as this is what they require. This is what is best for them, a safe and secure environment with less people. Special needs children will not be received well by children already attending mainstream and there will be an increase in bullying due to the fact that they are different. Some parents have negative views on SEN which then reflects into their children.”

“It would not just be a matter of curriculum changes that would be needed in order for some children to be reintegrated back into a mainstream setting especially if the reason they left mainstream was for their mental health. If a child with autism couldn't cope in mainstream due to sensory differences especially around the noise and hustle and bustle that are part of a large mainstream setting then that wouldn't be able to be changed by a differentiated curriculum. You can't accommodate that child. They would still need a specialist provision.”

“I do not believe your school-to-school model will provide appropriate support for SEN kids as I believe needs to complex to be met in secondary schools which do not have resources, experience, time or knowledge to meet their needs. My daughter spent 3 years not attending mainstream school whilst we waited for diagnosis, etc and EHCP and provision in a school which can finally help meet her needs in a small specialist setting.”

Example verbatims underpinning comments that **there would need to be SEN trained staff in mainstream settings / robust training / it takes years to train staff in SEN** can be found below:

“These proposed models are reliant on good teaching staff who have a robust knowledge of ASD for example. ASD is complex and if you have met one child with Autism you have met one child with Autism. Offering interventions such as Attention Autism for example and thinking that this one strategy will meet the needs of all children with autism is outdated and not realistic.”

“Special schools do not have enough expertise to provide outreach services provided. Satellites would be more suitable for some but also extensive staff training of expecting staff in mainstream to support SEND as proposed.”

“It’s all a nice idea but this is not something that can be quickly trained. The worry that non specialist teachers will be pushed for greater roles without proper training.”

“Special schools helping to improve teacher training at the local universities. Twenty minutes for half the school’s direct pathway cohort is simply not good enough. If you want more children with SEN in mainstream schools, then you need to ensure teachers are equipped for this and currently they are not.”

Example verbatims underpinning comments that **querying funding and investment** can be found below:

“Where would the funding and time come from for Special school staff to do this if they are to continue to fulfil their day-to-day responsibilities with an already increasingly complex cohort? This would mean more financial outlay for KCC and a markedly degraded outcome for current pupils. I think you are well aware of this and have no real intention of adequately funding and planning this and have no real care or compassion relating to pupil outcomes/wellbeing/development.”

“Special schools would need extra funding to undertake the school-to-school model. Most children placed in PSCN schools could not be appropriately reintegrated back into mainstream and have their needs met. It is essential that funding is secured to deliver this model (invest to save) and clearly aligned funding should be included as without extra funding capacity cannot be built.”

“How will SEN schools fund this? This has not been made clear in the consultation document. This model is going to create a huge increase in funding and capacity which in the current model SEN schools do not have. Why is this not being looked at currently through the LIFT Exec? How is this going to change what we are currently providing?”

“I think all these things would be useful and SEN schools would happily support mainstream colleagues but I won’t answer as such my answers will simply appear as agreement in your statistics without the important caveats.....where will the funding come from? Will mainstream schools have funding for the staff and resources that SEN schools have (although our budgets are a fraction of what they were)? Will mainstream schools be able to provide alternative curriculums where necessary without repercussions from Ofsted? Will Special Schools be given additional funding so they can release staff for 1:1 support? So many questions.....”

Any comments about suggested designations for specific special schools

Consultees were asked to note any comments about the suggested designations for specific special schools in their own words. The comments have been reviewed and grouped into themes consistent with the process reported in the 'Points to Note' section. 30% of consultees provided a comment at this question.

The most common themes noted are as follows:

- Special schools and teacher expertise are tailored to specific SEND needs: perceptions that changing their designation will dilute the specialism / will be unable to continue to deliver successful outcomes / limits the offer – 26% of consultees answering
- Disagree with the changes to designations / deeply concerned about these changes – 17% of consultees answering
- Lack of consultation / co-design with schools, parents, children, teachers, experts / listen/ lack of detail and evidence – 17% of consultees answering
- All SEN children have a right to an education that meets their needs, not just those you deem more complex / whole cohorts of children will be placed in settings unsuitable for them – 17% of consultees answering
- How will this be funded? Special schools have received no info on how they'll be funded. This will need huge funding – 15% of consultees answering

If you have any comments about the suggested designations for specific special schools, please tell us. Base: all consultees providing a response (452), themes 2% and above reported below

% THEME	Number of responses	Percentage
Special schools and teacher expertise are tailored to specific SEND needs: changing their designation will dilute the specialism / will be unable to continue to deliver successful outcomes / limits the offer	119	26%
Disagree with the changes to designations / deeply concerned about these changes	78	17%
Lack of consultation / co-design with schools, parents, children, teachers, experts / listen/ lack of detail and evidence	77	17%
All SEN children have a right to an education that meets their needs, not just those you deem more complex / whole cohorts of children will be placed in settings unsuitable for them	77	17%
How will this be funded? Special schools have received no info on how they'll be funded. This will need huge funding	66	15%
SEND children (even if academically able) cannot cope in mainstream settings: class sizes, noise, change, whole environment unsuitable; placing SEND children in a mainstream setting is not in their best interests and will damage them	58	13%
Mainstream schools cannot support SEND children: lack of funding, resources, specialist teachers	57	13%

% THEME	Number of responses	Percentage
Children in the right specialist setting thrive / my child has thrived in the correct specialist setting: learn at their pace and level, receive the necessary support specific to their needs, become more independent, are happier, have better mental health, make friends, feel and act so much better	48	11%
There should be more special schools, including more satellite provisions	48	11%
Communication and Interaction is complex, it should not be removed, we should not exclude these children, they need specialist settings	48	11%
Cost saving at expense of children	46	10%
Placing a SEND child in a mainstream or the wrong setting will impact their education, they will fall behind because they cannot cope in the mainstream or wrong environment, they will have poorer educational outcomes	45	10%
Overlooks the complex and diverse needs of children with SEND / oversimplifies / should be a designation for neurodiverse, academically able	44	10%
Autism / ASD is complex, these children need specialist settings	43	10%
Cannot mix different SEND needs children together: there are safeguarding issues / e.g. PSCN cannot be mixed with SEMH / the children will not cope being mixed in with children with differing SEND needs	41	9%
Do not change the designation of Snowfields	41	9%
Placing a SEND child in a mainstream or the wrong setting will impact mental health, there'll be an increase in mental health problems if forced into mainstream or the wrong setting	40	9%
Schools are already stretched and struggling: will put too much pressure on the teachers, they will burnout	36	8%
Poorly thought out / blinkered / short term / will cost more in the long term / doesn't change the need	31	7%
Physical Disability and Severe / Complex Needs should remain, must not exclude or lump these children in with another category, they cannot be supported in mainstream settings	30	7%
Mainstream school failed my child, they did not cope / impacted child negatively	28	6%
Do not change the designation of Valence	28	6%
Placing a SEND child in a MS or the wrong setting will result in school avoidance, EBSA, more children unable to attend school	27	6%
Placing a SEND child in a mainstream or the wrong setting will impact their future life opportunities, they will be less likely to gain employment, could end up relying on support services, could end up in the criminal justice system, their chance of becoming independent adults could be impeded	25	6%

% THEME	Number of responses	Percentage
Discriminatory / against the United Nations Convention on the Rights of the Child / will result in tribunals / breaks legal obligations	20	4%
Special schools have been rated as outstanding / protect these schools of excellence	13	3%
Do not change the designation of Stone Bay	13	3%
Do not change the designation of Grange Park	12	3%

Example verbatims underpinning comments that **special schools and teacher expertise are tailored to specific SEND needs: perceptions that changing their designation will dilute the specialism / will be unable to continue to deliver successful outcomes / limits the offer** can be found below:

“Grange Park School has received significant recognition by external bodies regarding the provision it provides their children. To even consider impacting a school which is clearly making such a significant positive impact on the lives and future potential for their children I find unbelievable - you simply don't change what is working so brilliantly. This should be a school that others go to in order to learn and gain best practice. This performance does not come by luck but by the hard work and diligence of the school leadership team as a whole. I feel that the mental health of the children is not a consideration and one that should be paramount... the very nature of being neurodiverse is that the ability to navigate the 'normal' world is far more complex and the provision of a specialist school which can spend the time to support the growth in these skills enables so many of these children to access mainstream education from 16+ Without this support many of these children I can guarantee would be absent from school for significant period of time and put significant pressure on other social care / mental health services as a result.”

“My concerns for resignation of such schools are that the staff will be compromised by having to retrain and adapt present teaching and learning strategies alongside continuing to meet the needs of the current cohort who are progressing because the school already meets their needs and provides the quality of environment and provision to support their progression. This very progression that is dependent on their specific environmental conditions will then be used against them to preclude them from their continued place at the school. Changing the goal posts does NOT change the need and the specific and carefully provided environment that is fostered at Laleham Gap to support and advocate for communication and interaction needs is crucial to success and cannot, by the very nature of busy and stimulating mainstream schools, be replicated in local schools with diluted support.

“The children with physical disabilities really need to be considered. Their needs are very complex and their care needs are far from straightforward. The provision Valence provides is second to none for these students. They feel safe at Valence because they know they have to care & support needed. There's also their medical needs, communication needs & equipment needs. This is why Valence is such an important school. The children feel comfortable and safe in an environment that considers them just as important as mainstream students.”

“The proposed changes will have significant impact on the entirety of Kent schools, both mainstream and special schools. The changes will have the most impact on 'Communication and Interaction' special schools, like Snowfields Academy. The young people that are given a place at these schools have a significant difficulty in communicating with others, saying what they want, understanding others or social rules of communication. Children with a diagnosis of ASC or similar are likely to have difficulty with these skills, this has a huge impact on their day to day life and access to education. Taking places in special schools away from young people with these difficulties will mean they will struggle to attend school in a busy environment, lack confidence to communicate which will not only affect their education but their future and damage their academic success. Special schools need to receive further information about funding to their schools once the proposals are set to be implemented, as so far, they have been provided with nothing. The funding provided should reflect the extensive changes that will need to be made to classrooms, school buildings, staffing, training and resources, with the changes of pupil needs.”

Example verbatims underpinning general comments about **disagreeing with the changes to designations / being deeply concerned about changes** can be found below:

“I am unsure of how the new designations have been defined as they have not been co-designed as part of any of the special school review process. The lack of co-design means the system has not moved with Local Authority thinking. The impact on the students within the existing designations has not been articulated, both in terms of data which projects impact or an impact assessment that addresses with impact on Kent's most vulnerable students, who also fall within disability frameworks. While I understand Local Authority Officer's vision around Local Special Schools, broadening designations only provides more challenge to the system. If Kent wants Local Special Schools for the future, a special schools review which identifies the usefulness of the current school buildings, pathways and expertise and what is needed for the future to change the landscape.”

“Leave Broomhill bank alone!!! Do not take away the one of a few schools away that supports those middle ground children away!! Profound and server should be in the high supported school not spread to others as this is going to affect the school negatively!!!”

“I would like to make it clear that I am vehemently opposed to this change. I think it hugely oversimplifies the SEN landscape and no real evidence has been provided to persuade me that it would benefit anyone. It makes the assumption that 'cognitively-able' and able to access education in a mainstream setting are the same, which is absolutely not the case.”

“We disagree with the new designations. Children falling within any of the 5 existing categories could be considered to have severe and complex needs. The new designations are misleading as they suggest that only those in the new category "Complex learning needs - profound, severe and complex needs" can have severe and complex needs, which isn't accurate.”

Example verbatims underpinning comments about a **lack of consultation / co-design with schools, parents, children, teachers, experts / listen/ lack of detail and evidence** can be found below:

“I just don't feel that you have properly thought this through - you're not listening to what the heads of the special schools are telling you. Councillor Trudy Dean said that they ALL disagree with this proposal - she would not have said that in public if it were untrue. In your APP, you are supposed to be improving the confidence of parents that schools can meet the needs of their children - you are doing the exact opposite if that - and I honestly dread to think what horror stories that will be told to Ofsted inspectors by parents and children at their next visit. KCC - you need to do better. Why can't you ask the government for more funding to meet your statutory services like you did for unaccompanied asylum-seeking children? Why are the children of Kent with SEND any different? Do they mean less to you?”

“Schools will be able to set their own admission policies and criteria, but no guarantee that the excellent support children are getting now in special schools will be replicated in mainstream schools. It was also mentioned in the online consultation about wellbeing practitioners being employed. How many will you have per school? What medical training will they have? Another cost! How will children be able to access a wellbeing practitioner? How often will children be able to access the wellbeing practitioner? Will they be able to come out of class? Or will children's wellbeing have to fit around certain times of the school day? Have you considered this?”

“These changes will initially have the most significant impact on “Communication and Interaction” special schools, such as Snowfields. The young people attending these schools struggle with communicating with others. This may be due to difficulties in expressing themselves, understanding what is being said, or using social rules of communication. Children and young people with ASD, including Asperger's Syndrome and Autism, are particularly likely to face challenges with social interaction. Special schools have not received any information about how they will be funded once the proposals are implemented in 2026. Consultation with special school heads has been superficial thus far. The Kent Special Educational Needs Trust (KSENT), which represents all special school heads in Kent, has written to the Council to express its opposition to these proposals.”

“Descriptors for designations are too ambiguous. It is not clear what risk assessments have been undertaken to accommodate SEN pupils in mainstream. How will this be funded? how will existing staff be trained/upskilled to manage more pupils with additional needs? Parents of mainstream schools impacted will need to understand what this will mean. Clarity will need to be provided how lessons will operate to accommodate pupils with different needs.”

“The Governing Body considers that there has been a totally inadequate review process that has not looked in sufficient detail at the strengths and weaknesses of current provision and the implications of making the proposed changes. Necessary impact assessments have not been carried out on what would happen if specialist physical and medical needs provision at Valence was ended and what resultant placements at non-maintained and independent schools there would be and how much these would cost.”

Example verbatims underpinning comments that **all SEN children have a right to an education that meets their needs, not just those deemed more complex / whole cohorts of children will be placed in settings unsuitable for them** can be found below:

“Many children get educationally delayed waiting for the right diagnosis, medication or school placement. They look like they are academically incapable and this will have a lifelong impact on them and their potential. KCC needs to cover complex needs but academically capable in the right setting.”

“The proposed designations cut adrift a vast number of children from SEND support, It is a numbers game driven by finance and fails to consider the impact on the child.”

“This will make things more confusing and lead to children being wrongly placed. Also seems a deliberate attempt a quietly getting rid of provision and restricting access, based on a set of beliefs not born out by research nor based on reason.”

“I disagree with your proposal to reduce designations to three types. It seems to be designed to suit your proposal rather than all children as I feel it excludes children who are academically capable but would struggle in mainstream due to their neuro, social, communication.”

Example verbatims underpinning comments about **funding concerns** can be found below:

“Where are schools going to find the resource to attend all of these suggestions. Most staff don't have time to keep up to date and on track with EHCPs or SEN paperwork let alone the support they will be required to give under these new models.”

“These are great in theory but in practice, where is the time and staffing cover coming from to action this? Knowing several teachers & TAs this seems like wishful thinking rather than practicable.”

“This model requires low staff turnover, which rarely happens in schools currently. It also requires schools to have capacity to provide such training and support, this also rarely happens, if you then add the additional children with needs into the mainstream school you are then adding pressure on staff and decreasing capacity. Mainstream schools would need to be able to recruit to these additional support roles required especially if care needs are involved. I have worked in education, in special schools, in a specialist unit and for a local authority and I also have a disabled son in a Kent special school. I have seen first-hand how difficult it is to meet the need of just one child in a mainstream setting let alone multiple, with physical needs that need physical intervention from adults. there is real difficulty to recruit people to these roles and then there is high turnover, and lots of the contracts are fixed term for the length of the child's education.”

“I support the model of schools working together. However, a lot of this is putting time on special schools teaching staff. I only agree if this does not affect their time doing their jobs of teaching their own students. KCC need to employ qualified teachers to do this by going to and from school not just using resources of those that are already over worked. This could be done in areas with a small team of teachers (they need to be qualified.) as it would be a full-time role.”

Any other comments about proposed changes

Consultees were asked to note any comments they would like to make about the proposed changes in their own words. The comments have been reviewed and grouped into themes consistent with the process reported in the 'Points to Note' section. 44% of consultees provided a comment at this question.

A variety of points are put forward at this question, but the most common themes noted are as follows:

- Proposed changes are not about the children / proposals are failing the children / cruel – 30% of consultees answering
- Mainstream schools cannot support these children: it's the whole infrastructure: (not just teachers): class sizes, sensory, disabled access, uniform regulations, breakout rooms, pastoral care suites – 21% of consultees answering
- Children in specialist schools are there for a reason / they will not cope if moved to a mainstream school – 20% of consultees answering
- This is about budget / funding cuts / safety-valve is a cost-cutting exercise – 17% of consultees answering
- Placing SEND children in mainstream setting will affect their well-being / mental health / traumatise them – 17% of consultees answering

Please tell us if you have any other comments you would like to make about the proposed changes. Base: all consultees providing a response (668), themes 2% and above reported below

% THEME	Number of responses	Percentage
Proposed changes are not about the children / proposals are failing the children / cruel	202	30%
Mainstream schools cannot support these children: it's the whole infrastructure: (not just teachers): class sizes, sensory, disabled access, uniform regulations, breakout rooms, pastoral care suites	139	21%
Children in specialist schools are there for a reason / they will not cope if moved to a mainstream school	131	20%
This is about budget / funding cuts / safety-valve is a cost-cutting exercise	115	17%
Placing SEND children in mainstream setting will affect their well-being / mental health / traumatise them	115	17%
Disagree entirely	110	16%
Placing SEND children in mainstream setting will affect their education / progression	108	16%
Do not change the designation for Valence school or other special schools / they are specialists in their cohort / prepare the children for adult life and future opportunities too / Valence is unique / special schools have been rated as good or outstanding	106	16%
Teachers: already stretched / not SEND qualified / experienced / need to be more / more funding for them / all should have SEND training / already struggling with recruitment and retention	105	16%

% THEME	Number of responses	Percentage
You need to build more SEND schools / more smaller SEND schools	84	13%
What's the forecast success rate / what risk analysis has been done / more information / evidence / clarity/ data needed	80	12%
What happens to those who aren't then deemed severe / complex enough? There will be many that fall in between (e.g. autistic children) / those academically able	77	12%
Short-sighted / will end up costing more money / has not been thought through	70	10%
KCC need to listen to us / consult all parents / consult special school / educational leaders / we are the experts; we know what we're talking about and what's needed to support the children / come and meet the children	64	10%
Placing SEND children in mainstream setting will affect their future life chances	57	9%
EHCP - stop making it difficult / complex / lengthy / fighting for a special place / assessments to start earlier - in pre-school	46	7%
This will result in children being unable to attend school / too many children unable to access education currently	44	7%
Discriminatory / amounts to breaking the law/ breach of the Disability Act	36	7%
Placing SEND children in mainstream setting will impact their families	30	4%
Pushes the problem on / more support will be needed when child impacted from being pushed into mainstream / carried through to later in life/adult care	28	4%
Placing SEND children in mainstream setting will disrupt the school / class	27	4%
Needs to happen / good idea / in agreement / only most severe in special schools	26	4%
What about physically disabled children / stop cutting budgets for physically disabled / they cannot cope in a mainstream school	24	4%
There should be regulation of independent, profiting, SEN provision schools	23	3%
Children are individual and should be placed accordingly / if in the right setting they will flourish	21	3%
This will lead to more tribunals, which will find in favour of the parents	21	3%
SEND and undiagnosed children in mainstream settings are often unfairly disciplined / treated / marginalised / not inclusive	20	3%
SEND children in mainstream settings are often bullied	20	3%
Home education will be / is on the rise (this will also impact parents) / parents who homeschool should be supported	18	3%

Example verbatims underpinning comments that **proposed changes are not about the children / the proposals are failing the children / cruel** can be found below:

“Stop pretending this is about making a better education for SEN pupils. We all know that this is about funding and cuts and having failed our children so badly start running your SEN dept at KCC more efficiently, create more SEN places in specialist schools to give parents a genuine choice for their children and stop wasting money fighting parents at tribunal when you usually end up losing anyway. Stop creating so many issues that the LGO issue repeated judgements against you also costing the authority more money. It may feel a strange concept but please work with parents and stop fighting us.”

“Whilst I am sympathetic to budget pressures and understand the need for savings (across all Government spending), the future of our young people should not be compromised because of savings, and sadly I believe these proposals will do that. This seems like a money saving exercise at the expense of our young people’s care and education.”

“The proposed changes will be incredibly damaging for the pupils and families. 70% of these children cannot cope in a normal SEN school. You will be ruining a safe nurturing environment to save money. And those responsible for this idea are betraying vulnerable children.”

“I feel constantly KCC don't care about SEN and are just clawing back money. Unfortunately, you won't until there are enough SEN places. It's known that most special schools you can't get a place in after reception as they are already at maximum capacity.”

Example verbatims underpinning comments that **mainstream schools cannot support these children (infrastructure and teachers)** can be found below:

“This proposal seems very reliant on having more SEND children placed in mainstream schools. At the moment this is not possible because mainstream schools don't have the funding to employ more staff to support those needs adequately, and no money make the necessary physical changes to their buildings. You can change 'designations' until you are blue in the face but if the funding isn't made available to increase the number of special school placements available AND provided to mainstream schools to make them more suitable to meet SEND needs that are not deemed as 'PROFOUND' then KCC is failing in its legal requirement to provide sufficient education to the children under its responsibility.”

“Having teachers from mainstream spend a bit of time in a SEN school will not change the environment of a mainstream school which is what a very high percentage of ASC children cannot cope with. They need very small class sizes, simple uniform (polo shirt), any school trousers and trainers, no walking around amongst 100 of pupils at change of lessons and no fear of punishment due to behaviour from unmet needs. The consultation does not state how this will be done.”

“What about the children with severe Autism and behavioural problems who cannot cope with change. Would they be taken into consideration. Some of these children can't cope with noise or too many people in one class. What would you do then to them poor children. These schools have worked well all this time and now you want to change it and cause a lot of problems, what for? For me this all about money and not about the children's best interests.”

“I trained in a LA area that had very few SEN schools, resulting in children with sometimes quite complex needs being educated in MS schools. Even those with less complex needs sometimes struggled in the MS environment. In my experience, this system was a complete failure for the children with SEN, who did not receive a sufficiently differentiated education from trained staff, and the MS children, due to staff being diverted to SEN children and behavioural issues affecting whole classes.”

Example verbatims underpinning comments that **children in specialist schools are there for a reason / they will not cope if moved to a mainstream school** can be found below:

“Specialist schools are so important to our children that need them and taking that option away from children who do not meet the extreme criteria will cause children to be lost under the radar and I fear child suicide would be on the rise too! I strongly disagree with this proposal.”

“Specialist schools working with local FE colleges and providers is only relevant at a certain level. Children with PCSN CANNOT attend local colleges, they need an adapted curriculum in a specialist setting. For many children the campus of a post 16 college would be overwhelming and unavailable. Please do not think you can fit our children into local colleges even with an adaptive curriculum. It needs to be a specialist setting with sufficient support for independence and safety.”

“My concern is the having seen many students transfer from a mainstream setting into a special school, the changes to their learning and personal development have been amazing. Seeing them thrive in a setting they feel they are safe to be themselves with similar individuals. It allows so many students to learn where if they were sent back to mainstream, this work would be undone. The smaller classes and flexible learning environment allow this, where a mainstream doesn't have the facilities to support this.”

RESPONSE TO EQUALITY IMPACT ASSESSMENT

Consultees were asked to provide the views on KCC's equality analysis on in their own words. The comments have been reviewed and grouped into themes consistent with the process reported in the 'Points to Note' section.

Only 23% of consultees provided a response to this question.

The most common themes noted are as follows:

- Inappropriate to be in a mainstream setting / need specialist schools – 31% of consultees answering
- Redesignation / categorisation / classification issues – 23% of consultees answering
- Should focus on / be tailored around children's needs – 20% of consultees answering
- All children have the right to education / given same opportunities / support / treated equally – 15% of consultees answering
- Discriminatory towards SEN – 15% of consultees answering
- Discriminatory towards disabled / those with medical issues – 15% of consultees answering

We welcome your views on our equality analysis and if you think there is anything else we should consider relating to equality and diversity?

Base: all consultees providing a response (358)

% THEME	Number of responses	Percentage
Inappropriate for children to be in a mainstream setting / need specialist schools	112	31%
Redesignation / categorisation / classification issues	83	23%
Should focus on / be tailored around children's needs	71	20%
Criticism of consultation / suggestions / concerns / questions raised	64	18%
All children have the right to education / given same opportunities / support / treated equally	55	15%
Detrimental effect on children	54	15%
Discriminatory towards SEN	53	15%
Discriminatory towards disabled / those with medical issues	52	15%
KCC are in breach of Equalities Act / Disabilities Act / dutybound by law	39	11%
Discriminatory towards ND / those with autism / sensory issues / ADHD	37	10%
KCC are just doing this to save money / funding issues	36	10%
This is not equality	34	9%
Discriminatory towards children	21	6%
Discriminatory in general (unspecified)	18	5%
Equality analysis is inadequate / this is not equality	15	4%

% THEME	Number of responses	Percentage
Issues with EHCPs / assessments / tribunals	15	4%
Other comments unrelated to equality analysis	14	4%
Concerns about implications for carers	12	3%
Equality analysis was unnecessary / focus on other things	11	3%
Discriminatory towards vulnerable people (unspecified)	11	3%
Discriminatory towards ethnic minorities / immigrants / those with English as a second language	10	3%
KCC don't care about children	9	3%

Example verbatims underpinning comments surrounding the key theme of it being inappropriate for children to be in a mainstream setting / needing specialist schools can be found below:

“The most vulnerable children are impacted by these changes and it is evident that this will cause significant issues for children that are unable to cope with mainstream but due to these criteria will either be unenrolled or forced to suffer through a mainstream setting which is not right for them and means they are unable to reach their potential.”

“Every child should be able to access education - currently the lack of specialist school places means that individual children are being discriminated against where their disabilities mean they cannot access mainstream and are not being offered specialist school position.”

“SEN children have protected characteristics you are failing and discriminating against them in further by denying them suitable schools, you will impact them further in life but not providing them the provisions they so desperately need, some SEN children will thrive in a mainstream environment but that's if they have the correct staff and provisions in place.”

Example verbatims underpinning comments surrounding the key theme of redesignation / categorisation / classification issues can be found below:

“Quite simply, your proposals to alter designations and admissions are discriminating against disabled children. These children need special school places - the decision in the past to place them in these schools has not been spurious, it has been based on needs. And you simply want to take that away, which is transparently non-inclusive and discriminatory.”

“This would clearly discriminate against those with disabilities that have special needs but not complex special needs, as they will be put at a severe disadvantage. Reasonable adjustments are also obviously not being made.”

“This seems to imply that autistic children may not always be seen as 'disabled' as someone with other severe mental/physical disabilities. This does seem to contradict Equality.”

NEXT STEPS

This consultation report, along with an Equality Impact Assessment, will be presented to the Children's, Young People and Education Cabinet Committee in November 2024. Following this, a decision will be made on whether or not to proceed with the proposals. The consultation webpage will be updated when there is an outcome for this consultation:

www.kent.gov.uk/specialschoolsreview.

APPENDIX – CONSULTATION QUESTIONNAIRE

Q1. Are you responding...?

Please select the option from the list below that most closely represents how you are responding to this consultation. Please select **one** option.

- | | |
|--------------------------|--|
| <input type="checkbox"/> | As a Kent resident (living in the Kent County Council authority area) |
| <input type="checkbox"/> | As a resident from somewhere else, such as Medway |
| <input type="checkbox"/> | On behalf of a friend or relative (please make sure you complete this questionnaire using their answers / information) |
| <input type="checkbox"/> | On behalf of an early years education provider, such as a nursery |
| <input type="checkbox"/> | On behalf of a mainstream primary school |
| <input type="checkbox"/> | On behalf of a mainstream secondary school |
| <input type="checkbox"/> | On behalf of a special school |
| <input type="checkbox"/> | As an education professional |
| <input type="checkbox"/> | As a Parish / Town / Borough / District / County Councillor |
| <input type="checkbox"/> | On behalf of a charity or Voluntary, Community or Social Enterprise organisation (VCSE) |
| <input type="checkbox"/> | As a KCC employee |
| <input type="checkbox"/> | Other, please tell us: |

Q1a. If you are responding on behalf of an organisation or school, please tell us its name. Please write in below.

Q2. Please tell us the first part of your postcode:

Please do not reveal your whole postcode, just the characters before the space, i.e. 'ME3' or 'ME12'. If you are responding on behalf of an organisation, please use your organisation's postcode. We use this to help us to analyse our data. It will not be used to identify who you are.

If you are responding on behalf of an organisation or in a professional capacity, please skip to Q5.

Q3. Are you a parent or carer of a child / children in education?

By education we mean attending nursery, school, college, or other further learning. Please select **one** option. If you answered 'No' please go to Q5.

<input type="checkbox"/>	Yes
<input type="checkbox"/>	No

Q3a. Please select the age group(s) that apply to your child / children:

Please select **all** that apply.

<input type="checkbox"/>	0-4 years old (Early Years)
<input type="checkbox"/>	4-5 years old (Reception)
<input type="checkbox"/>	5-11 years old (Primary aged Years 1-6)
<input type="checkbox"/>	11-16 years old (Secondary aged Years 7-11)
<input type="checkbox"/>	16-18 years old (Post-16 Years 12-13)
<input type="checkbox"/>	19 years and over (Later than Year 13, but started current course / qualification before 19 th birthday)

Q4. Do you have a child / children with Special Educational Needs who is educated in Kent? If you have more than one child with Special Educational Needs, please tick **all** that apply. If you answered 'No' please go to Q5.

<input type="checkbox"/>	Yes, and my child has an Education, Health, and Care Plan (formerly known as a "statement")
<input type="checkbox"/>	Yes, and my child does not have an Education, Health, and Care Plan
<input type="checkbox"/>	No
<input type="checkbox"/>	Don't know

Q4a. If you answered 'Yes' to Q4, please tell us which type of school or further education establishment in Kent your child / children attends.

Please select **all** that apply.

- Nursery / pre-school
- Mainstream primary school (including infant and junior)
- Non-selective secondary mainstream
- Selective secondary mainstream (grammar)
- Special school
- Further education college
- Kent independent education provider
- Other, please say which type:

Q5. How did you find out about this consultation? Please select **all that apply.**

- An email from specialschoolreview@kent.gov.uk
- An email from Let's talk Kent / KCC's Engagement and Consultation Team
- From a mainstream primary school
- From a mainstream secondary school
- From a special school
- From a KCC County Councillor
- From my Parish / Town / Borough / District Council
- From a friend or relative
- Social Media (e.g., Facebook, Next Door, X (formerly Twitter), and LinkedIn)
- Kent.gov.uk website
- KCC's staff intranet
- Other, please specify:

Please refer to Section 4 of the consultation document.

KCC is proposing that the children for whom special school places are planned, are those who have both an Education, Health and Care (EHC) Plan and also have severe and complex special educational needs. Special school places would not be planned for those with lower levels of need that could be met through an adapted curriculum in a mainstream school.

Q6. To what extent do you agree or disagree that KCC should be planning special school places for those children who have severe and complex needs? Please select **one** option.

- Strongly agree
- Tend to agree
- Neither agree nor disagree
- Tend to disagree
- Strongly disagree
- Don't know

Q6a. Please tell us the reasons for your response.

Please do not include any personal information that could identify you or anyone else within your response.

Please refer to Section 5 of the consultation document for more information on the proposed designations.

We propose moving from 5 designations to 3. This is with the intention of creating equity of access to special school places for those children with severe and complex SEND and to support these children and young people in becoming independent within or near their local community as adults.

There is no change proposed to the designation of Profound, Severe and Complex Needs (PCSN) Schools – other than to describe this as ‘Complex Learning Needs’. There is no change to the designation ‘Social, Emotional Mental Health (SEMH) Needs’. A new designation has been introduced which encompasses those children who are neurodivergent and have learning difficulties - they may or may not have a diagnosis of autism or similar conditions.

If the proposals were agreed and subject to any further processes (including prescribed alterations) there would no longer be a special school designation of ‘Physical Disabilities and/or Complex Medical Needs’. Schools with this designation would change to Profound, Severe and Complex Needs - Complex Learning Needs. It is also proposed there will no longer be a designation of Communication & Interaction or Communication & Interaction with Learning Difficulties. Communication & Interaction Schools with this designation would change to Neurodivergent with learning difficulties and Communication & Interaction with Learning Difficulties would become Complex learning needs – Profound, Severe and Complex needs.

This next question is about the principle of moving to three designations of special schools across Kent. If you have views on a particular school, you can give us those in a later question.

Please note that where any school is proposed for a change, the steps that follow in relation to designation and admission guidance changes would depend on whether the individual schools affected are maintained schools or part of an Academy Trust. Please see Section 1 for further information.

Q7. To what extent do you agree or disagree that moving to three designations for special schools will enable us to achieve the aim of providing special school provision for children and young people in Kent with severe and complex special educational needs?

Please select **one** option.

<input type="checkbox"/>	Strongly agree
<input type="checkbox"/>	Tend to agree
<input type="checkbox"/>	Neither agree nor disagree
<input type="checkbox"/>	Tend to disagree
<input type="checkbox"/>	Strongly disagree
<input type="checkbox"/>	Don't know

Q7a. Please tell us the reasons for your response.

Please do not include any personal information that could identify you or anyone else within your response.

KCC proposes to implement a graduated change starting from September 2026. From this date, the new designation and admission guidance would apply to children and young people requesting special school places. Those already attending a special school will remain enrolled at that school, subject to the annual review process as per the current statutory requirement. This suggested approach would result in a gradual change over time, year by year.

Q8. To what extent do you agree or disagree with this graduated approach to the change over time?

Please select **one** option.

- | | |
|--------------------------|----------------------------|
| <input type="checkbox"/> | Strongly agree |
| <input type="checkbox"/> | Tend to agree |
| <input type="checkbox"/> | Neither agree nor disagree |
| <input type="checkbox"/> | Tend to disagree |
| <input type="checkbox"/> | Strongly disagree |
| <input type="checkbox"/> | Don't know |

Q8a. Please tell us the reasons for your response.

Please do not include any personal information that could identify you or anyone else within your response.

Please refer to Section 6 of the consultation document for more information.

Currently some special schools provide opportunities for mainstream schools to observe their practices, attend their settings, and visit mainstream schools to assist staff in developing plans and intervention strategies. However, this practice is not widespread. KCC envisions mainstream and special schools both being able to visit each other's settings, interact and collaborate to learn about teaching, planning, staffing and finances. This approach aims to address the support needs of local schools more responsively.

Q9. If Kent were to adopt the proposed school-to-school model of support, please tell us to what extent you agree or disagree with the following actions being part of the model? Please select **one** option per row.

	Proposed action	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree
1	Special schools supporting transition for children or young people (re)integrating into mainstream settings.					
2	Special schools designating specific days when mainstream colleagues from their locality are invited to visit, shadow special school staff and observe their practices.					
3	Mainstream settings being able to request a one-to-one consultation with lead teachers from special schools on specific aspects of education.					
4	Special schools proactively working with local Further Education colleges and other providers to improve adapted curriculum and access to specialist teaching facilities in the Post-16 sector.					

Q9a. If you have any suggestions for what else should be included in the school-to-school support model, please tell us below.

Q10. If you have any comments about the suggested designations for specific special schools, please tell us in the box below.

Please note, that where any school is proposed for a change, there are separate processes that will need to be followed depending on whether the school is a maintained special school or part of an academy trust. Please refer to appendix 1 in the consultation document for further information.

Q11. Please tell us if you have any other comments you would like to make about the proposed changes.

To help ensure that we are meeting our obligations under the Equality Act 2010 we have prepared an Equality Impact Assessment (EqIA) on the Special Schools Review: proposed changes to designations and admissions guidance.

An EqIA is a tool to assess the impact any proposals would have on the protected characteristics: age, disability, sex, gender identity, sexual orientation, race, religion or belief, and carer's responsibilities. The EqIA is available online at www.kent.gov.uk/specialschoolsreview or in paper copy on request.

Q12. We welcome your views on our equality analysis and if you think there is anything we should consider relating to equality and diversity, please add any comments below.

Please do not include any personal information that could identify you within your response.

We want to make sure that everyone is treated fairly and equally, and that no one gets left out. That's why we are asking you these questions. We'll use it only to help us make decisions and improve our services.

If you would rather not answer any of these questions, you don't have to.

It is not necessary to answer these questions if you are responding on behalf of an organisation.

If you are responding **on behalf of someone else**, please answer using their details.

Q13. Are you...? Please select one option.

<input type="checkbox"/>	Male
<input type="checkbox"/>	Female
<input type="checkbox"/>	I prefer not to say

We use the terms "transgender" and "trans" as inclusive umbrella terms for a diverse range of people who find their gender identity differs in some way from the gender they were originally assumed to be at birth.

Q14. Have you ever identified, or do you identify as a transgender or trans person? Please select one option.

<input type="checkbox"/>	Yes
<input type="checkbox"/>	No
<input type="checkbox"/>	Other
<input type="checkbox"/>	I prefer not to say

Q15. Which of these age groups applies to you? Please select one option.

<input type="checkbox"/>	0-15	<input type="checkbox"/>	16-24	<input type="checkbox"/>	25-34	<input type="checkbox"/>	35-49	<input type="checkbox"/>	50-59
<input type="checkbox"/>	60-64	<input type="checkbox"/>	65-74	<input type="checkbox"/>	75-84	<input type="checkbox"/>	85+ over	<input type="checkbox"/>	I prefer not to say

Q16. Do you regard yourself as belonging to a particular religion or holding a belief? Please select one option.

<input type="checkbox"/>	Yes
<input type="checkbox"/>	No
<input type="checkbox"/>	I prefer not to say

Q16a. If you answered 'Yes' to Q16, which of the following applies to you? Please select one option.

<input type="checkbox"/>	Christian
<input type="checkbox"/>	Buddhist
<input type="checkbox"/>	Hindu
<input type="checkbox"/>	Jewish
<input type="checkbox"/>	Muslim
<input type="checkbox"/>	Sikh
<input type="checkbox"/>	Other
<input type="checkbox"/>	I prefer not to say

If you selected Other, please specify:

The Equality Act 2010 describes a person as disabled if they have a long standing physical or mental condition that has lasted, or is likely to last, at least 12 months; and this condition has a substantial adverse effect on their ability to carry out normal day-to-day activities. People with some conditions (cancer, multiple sclerosis, and HIV/AIDS, for example) are considered to be disabled from the point that they are diagnosed.

Q17. Do you consider yourself to be disabled as set out in the Equality Act 2010? Please select **one** option.

- Yes
- No
- I prefer not to say

Q17a. If you answered 'Yes' to Q17, please tell us the type of impairment that applies to you.

You may have more than one type of impairment, so please select all that apply. If none of these applies to you, please select 'Other' and give brief details of the impairment you have.

- Physical impairment
- Sensory impairment (hearing, sight or both)
- Longstanding illness or health condition, such as cancer, HIV/AIDS, heart disease, diabetes or epilepsy
- Mental health condition
- Learning disability
- I prefer not to say
- Other

Other, please specify:

A Carer is anyone who provides unpaid care for a friend or family member who due to illness, disability, a mental health problem or an addiction cannot cope without their support. Both children and adults can be carers.

Q18. Are you a Carer? Please select **one** option.

- Yes
- No
- I prefer not to say

Q19. Are you ...? Please select **one** option.

- Heterosexual/Straight
- Bi/Bisexual
- Gay man
- Gay woman/Lesbian
- Other
- I prefer not to say

Q20. To which of these ethnic groups do you feel you belong? Please select **one** option.
(Source 2011 Census)

- | | |
|---|---|
| <input type="checkbox"/> White English | <input type="checkbox"/> Mixed White & Black Caribbean |
| <input type="checkbox"/> White Scottish | <input type="checkbox"/> Mixed White & Black African |
| <input type="checkbox"/> White Welsh | <input type="checkbox"/> Mixed White & Asian |
| <input type="checkbox"/> White Northern Irish | <input type="checkbox"/> Mixed Other* |
| <input type="checkbox"/> White Irish | <input type="checkbox"/> Black or Black British Caribbean |
| <input type="checkbox"/> White Gypsy/Roma | <input type="checkbox"/> Black or Black British African |
| <input type="checkbox"/> White Irish Traveller | <input type="checkbox"/> Black or Black British Other* |
| <input type="checkbox"/> White Other* | <input type="checkbox"/> Arab |
| <input type="checkbox"/> Asian or Asian British Indian | <input type="checkbox"/> Chinese |
| <input type="checkbox"/> Asian or Asian British Pakistani | <input type="checkbox"/> I prefer not to say |

Asian or Asian British Bangladeshi

Asian or Asian British Other*

*Other - If your ethnic group is not specified on the list, please describe it here:

This report was produced for Kent County Council