

## EQIA Submission – ID Number

### Section A

**EQIA Title**

Specialist Resource Provision Review and Commissioning Intentions

**Responsible Officer**

Marisa White - CY EDSN

**Approved by (Note: approval of this EqIA must be completed within the EqIA App)**

Siobhan Price - CY EDSN

**Type of Activity****Service Change**

Service Change

**Service Redesign**

No

**Project/Programme**

Project/Programme

**Commissioning/Procurement**

No

**Strategy/Policy**

No

**Details of other Service Activity**

No

**Accountability and Responsibility****Directorate**

Children Young People and Education

**Responsible Service**

Education and SEND

**Responsible Head of Service**

Siobhan Price - CY EDSN

**Responsible Director**

Christine McInnes - CY EDSN

**Aims and Objectives**

The Department for Education expects Local Authorities (LA) to manage their specialist estates efficiently to avoid detriment to schools' educational offers, creating disadvantage to children and young people who have special educational needs (SEND), or the LA's financial position. This means ensuring the sustainability of maintained specialist school places that are appropriately matched to need-type, phases of education and geographical locations.

These proposals sit within the broader context of KCC's transformation of SEND system, working to ensure equitable provision for all children and young people throughout the County and improve outcomes for Kent's most vulnerable children. The programme includes the introduction of a school-to-school model of support (communities of schools) aligned with Health Primary Care Networks (PCNs), a review of the service level agreement for Specialist Resource Provisions to be implemented for September 2026; the introduction of a SEND continuum of need and provision designed to support decision making around support for children and young people, and work on a new funding model to support children and young people with SEND in accessing the curriculum, whether they are being educated in a mainstream school, mainstream with SRP, through an Alternative Curriculum provider or a maintained special school.

The proposals will also come under the Kent Commissioning Plan for Education Provision and KCC's SEND Sufficiency Plan processes in order to ensure alignment with the Capital budget planning and reporting

process.

The proposals aim to ensure that KCC has sufficient choice of planned provision geographically across the continuum of education: mainstream schools, mainstream schools with specialist resource provision (SRPs), and special schools, focussing on SRPs in this instance. Provision must be financially viable to ensure that it can provide the quality of education and specialist support required to ensure the best outcomes for children and young people with SEND.

The aim is to provide additional specialist SEN and disability spaces through new and expanded Specialist Resource Provisions within mainstream schools. The proposals aim to address pathway gaps (primary to secondary gaps in provision), geographical gaps (where children and young people currently have to travel long distances to access appropriate SRP places, and demand gaps (where children and young people are having to be placed in the Independent, non-maintained sectors due to lack of maintained provision). The proposals aim to enhance current provision and are positive for the local communities as there will be more places available to meet the needs of children and young people in their local area.

With regard to proposals to change the model of support for the few children and young people with visual impairment (VI) who currently attend SPS specifically for VI. The proposals are to expand the current model that operates across most of the County. Provision must be financially viable to ensure that it can provide the quality of education and specialist support required to ensure the best outcomes for children and young people with SEND.

The low numbers of children and young people in provisions with VI as their designation as well as the location of current provisions only in the east and south of the County means that the viability and accessibility of these SRPs is an issue. The low numbers of children with VI requiring support from an SRP also prohibits expansion of similar provision across the County. As schools have become more inclusive, new accommodation is designed to be more accessible and with improvements in technology, increased numbers of children and young people with visual impairments are choosing to attend their local mainstream schools. These children are supported by the Qualified Teachers for Visual Impairment and other VI specialists from the KCC Specialist Teaching Services for Children and Young People with Sensory Impairment and/or Physical Disabilities. It is proposed that all children and young people with VI will be able to attend their local mainstream schools, if appropriate, and will be supported by the KCC Specialist team providing peripatetic services across the County.

It should be noted that children and young people currently attending the provisions that are affected by the proposals will not be detrimentally impacted. They will remain in the mainstream schools they currently attend and will receive continuing support.

The Qualified Teachers for VI currently employed in relation to the VI SRPs (all are employed by Academy Trusts) all carry additional duties within their schools and will not be detrimentally impacted by these proposals. They will retain links to the central team of specialist teachers in order to ensure that their qualifications and practice are kept up to date.

The recommendations for Post 16 are to remain with current policy- that SRP places are for young people in Years 7 to 11, and to be consistent in our approach to placement of young people Post 16, whilst being able to consider exceptional cases. The Local Authority is required by law to ensure any young person with an EHCP is able to access support required to meet their needs as set out in their EHC Plan. This does not necessarily mean that this has to be through a place in an SRP.

## Section B – Evidence

<b>Do you have data related to the protected groups of the people impacted by this activity?</b>
Yes
<b>It is possible to get the data in a timely and cost effective way?</b>
Yes
<b>Is there national evidence/data that you can use?</b>
Yes
<b>Have you consulted with stakeholders?</b>
No
<b>Who have you involved, consulted and engaged with?</b>
<p>No. There has been targeted consultation as part of the review and gap analysis. This consultation has been with maintained mainstream and special schools and partner organisations. There has not been any public consultation to include service users. It is intended that this will take place linked to individual proposals as they are brought forward through the recognised statutory and democratic process and in accordance with the following government guidance:</p> <p>Making significant changes to maintained schools  Making significant changes to an academy  Involved so far:  Maintained schools (including Academies, Academy Trusts, Special Schools and PRUs)  Education and Special Educational Needs staff.  Partner organisations (nhs).</p> <p>Future (on individual proposal basis):  maintained primary, secondary and special school staff and governing bodies including academies  SRP Lead teachers, SENCOs  Parents of children/young people  KENT PACT  KCC Members  Kent MPs  District/Borough/City Councils  All relevant partner agencies  Cof E and RC Diocesan authorities  Relevant representative groups for relevant SEND need types</p>
<b>Has there been a previous Equality Analysis (EQIA) in the last 3 years?</b>
No
<b>Do you have evidence that can help you understand the potential impact of your activity?</b>
Yes
<b>Section C – Impact</b>
<b>Who may be impacted by the activity?</b>
<b>Service Users/clients</b>
Service users/clients
<b>Staff</b>
Staff/Volunteers
<b>Residents/Communities/Citizens</b>
No
<b>Are there any positive impacts for all or any of the protected groups as a result of the activity that you are doing?</b>
Yes
<b>Details of Positive Impacts</b>

For children and young people with an Education, Health and Care Plan, the proposals intend to provide additional specialist SEN and disability spaces through new and expanded Specialist Resource Provisions within mainstream schools. The proposals aim to address pathway gaps (primary to secondary gaps in provision), geographical gaps (where children and young people currently have to travel long distances to access appropriate SRP places, and demand gaps (where children and young people are having to be placed in the Independent, non-maintained sectors due to lack of maintained provision). Where changes are proposed to the designations of current SRPS, these are made to ensure that SRPs can meet the needs of children and young people in their locality.

The proposals (once implemented) should provide more choice for children and young people with SEN who prefer and/or would benefit from remaining with maintained mainstream schools alongside their peers but require the additional support that an SRP brings. They also are designed to reduce the distances some children and young people are currently having to travel to access appropriate provision and enable them to access appropriate education provision more locally.

All children and young people with an EHC Plan for VI who wish to be educated in mainstream schools will be able to attend their local schools and receive the specialist support they require to achieve their potential no matter where in Kent they live.

For children and young people with an EHCP for VI, KCC Specialist Teaching Services for Children and Young People with Sensory Impairment and/or Physical Disabilities will provide the appropriate support to children in their local schools and provide advice, support and training to schools with pupils with complex VI. The Service is already aware of the children with complex VI and the support they require having supported most from birth. The proposed model of support already operates across North and West Kent and in schools without an SRP for VI in East and South Kent.

All children with an Education, Health and Care Plan are entitled to the support set out within that plan no matter whether they attend an SRP or are supported within the mainstream school.

## Negative impacts and Mitigating Actions

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

#### Are there negative impacts for age?

Yes

#### Details of negative impacts for Age

Those young people who have been receiving support in an SRP and remain in their mainstream school Post 16 who will no longer be funded for a continued placement in the SRP unless there are exceptional circumstances.

#### Mitigating Actions for Age

- 1) Ensure that all decisions that are made in relation to the EHC Needs Assessment, subsequent issuing of an EHC Plan and placements are made consistently in line with decision making protocols and the law.
- 2) To introduce a robust and well organised procedure for Post 16 transfer, ensuring that all decisions made regarding placements are made consistently and lawfully and that EHCPs are reviewed to reflect the young person's needs as they progress towards adulthood.
- 3) To ensure that all young people with an EHCP at Post 16 are receiving the support set out within their plan.

#### Responsible Officer for Mitigating Actions – Age

Alice Gleave – SEN Safety Valve Lead

<b>20. Negative impacts and Mitigating actions for Disability</b>
<b>Are there negative impacts for Disability?</b>
Yes
<b>Details of Negative Impacts for Disability</b>
<p>Yes, children and young people with visual impairment in East and South Kent who will no longer be able to attend an SRP specifically for VI.</p> <p>Those few pupils whose families chose an SRP for VI and lived in East and South Kent would no longer have that option to choose from.</p>
<b>Mitigating actions for Disability</b>
<p>1. The option of an SRP with a different designation if the child/young person also had other SEND needs would remain open.</p> <p>2. The child/young person would receive full support in their local school from fully qualified teachers for VI and other specialist VI staff via the KCC Specialist Teaching Services for Children and Young People with Sensory Impairment and/or Physical Disabilities.</p>
<b>Responsible Officer for Disability</b>
Rory McDonnell – Head of Specialist Teaching Service
<b>21. Negative Impacts and Mitigating actions for Sex</b>
<b>Are there negative impacts for Sex</b>
No
<b>Details of negative impacts for Sex</b>
Not Applicable
<b>Mitigating actions for Sex</b>
Not Applicable
<b>Responsible Officer for Sex</b>
Not Applicable
<b>22. Negative Impacts and Mitigating actions for Gender identity/transgender</b>
<b>Are there negative impacts for Gender identity/transgender</b>
No
<b>Negative impacts for Gender identity/transgender</b>
Not Applicable
<b>Mitigating actions for Gender identity/transgender</b>
Not Applicable
<b>Responsible Officer for mitigating actions for Gender identity/transgender</b>
Not Applicable
<b>23. Negative impacts and Mitigating actions for Race</b>
<b>Are there negative impacts for Race</b>
No
<b>Negative impacts for Race</b>
Not Applicable
<b>Mitigating actions for Race</b>
Not Applicable
<b>Responsible Officer for mitigating actions for Race</b>
Not Applicable
<b>24. Negative impacts and Mitigating actions for Religion and belief</b>
<b>Are there negative impacts for Religion and belief</b>
No
<b>Negative impacts for Religion and belief</b>

Not Applicable
<b>Mitigating actions for Religion and belief</b>
Not Applicable
<b>Responsible Officer for mitigating actions for Religion and Belief</b>
Not Applicable
<b>25. Negative impacts and Mitigating actions for Sexual Orientation</b>
<b>Are there negative impacts for Sexual Orientation</b>
No
<b>Negative impacts for Sexual Orientation</b>
Not Applicable
<b>Mitigating actions for Sexual Orientation</b>
Not Applicable
<b>Responsible Officer for mitigating actions for Sexual Orientation</b>
Not Applicable
<b>26. Negative impacts and Mitigating actions for Pregnancy and Maternity</b>
<b>Are there negative impacts for Pregnancy and Maternity</b>
No
<b>Negative impacts for Pregnancy and Maternity</b>
Not Applicable
<b>Mitigating actions for Pregnancy and Maternity</b>
Not Applicable
<b>Responsible Officer for mitigating actions for Pregnancy and Maternity</b>
Not Applicable
<b>27. Negative impacts and Mitigating actions for Marriage and Civil Partnerships</b>
<b>Are there negative impacts for Marriage and Civil Partnerships</b>
No
<b>Negative impacts for Marriage and Civil Partnerships</b>
Not Applicable
<b>Mitigating actions for Marriage and Civil Partnerships</b>
Not Applicable
<b>Responsible Officer for Marriage and Civil Partnerships</b>
Not Applicable
<b>28. Negative impacts and Mitigating actions for Carer's responsibilities</b>
<b>Are there negative impacts for Carer's responsibilities</b>
No
<b>Negative impacts for Carer's responsibilities</b>
Not Applicable
<b>Mitigating actions for Carer's responsibilities</b>
Not Applicable
<b>Responsible Officer for Carer's responsibilities</b>
Not Applicable