
From: Christine McInnes, Interim Corporate Director Children, Young People and Education

To: Beverley Fordham, Cabinet Member for Education and Skills

Subject: Proposal to remove the specialist resource provision at River Primary School, Dover

Decision no: 25/00111

Key Decision : Yes

Classification: Unrestricted

Past Pathway of report: Children's Young People and Education Cabinet Committee 20th January 2026

Future Pathway of report: Cabinet Member Decision

Electoral Division: Dover Town - James Defriend and Albert Thorp

Is the decision eligible for call-in? Yes

Summary:

This report sets out the proposal to remove the specialist resource provision (SRP) at River Primary School, Dover.

Recommendation(s):

That the Cabinet Member consider the following proposals:

- I. Issue a Public Notice to permanently remove the specialist resource provision for pupils with speech and language needs at River Primary school, and following a representation period of four weeks with no substantive objections received, then implement the decision;
- II. Authorise the Corporate Director Children, Young People and Education to take all steps necessary to issue a Public Notice; and
- III. Authorise the Corporate Director Children, Young People and Education, in consultation with the Cabinet Member for Education and Skills, to take relevant actions, including but not limited to entering into relevant contracts or other legal agreements as required, to implement the decision, subject to there being no new substantive objections received during the notice period.

1. Introduction

- 1.1 The specialist resource provision (SRP) at River Primary School was commissioned for the start of the September 2015 academic year. At that time, there was a need for additional specialist provision for pupils specifically with speech and language needs (S&LN). River Primary School was identified by colleagues in the National Health Service as doing particularly well at

supporting pupils with S&LN. When full, it was expected that 12 places would be commissioned. Currently there are only four pupils accessing the SRP and all will move on to secondary school within the next two years.

- 1.2 In light of the low number of pupils in the SRP, the Governing Body has requested KCC remove the provision from September 2026. Consideration has been given to broadening the need type that the SRP can support, but the accommodation and site constraints at River Primary School mean the premises do not easily lend themselves to such a proposal. Therefore, the proposal is to remove the SRP.
- 1.3 Should the SRP be removed, the school and the LA are committed to work with the families and pupils who would have been on roll in the SRP to ensure their needs are met. An annual review will be held for each of these pupils to identify their current needs, and the support required moving forwards.

2. Key Considerations

- 2.1 In Kent, in school organisation terms, the continuum of provision for pupils with special educational needs and disabilities (SEND) is mainstream schools, through specialist resourced provision (SRPs) in mainstream schools, then to special schools. One strand of the work to improve the quality of provision for children with SEND, and their outcomes, has been to review the current pattern and quantum of SRPs, to consider how well these match existing and future demand.

3. Background

- 3.1 The paucity of pupils placed in the SRP at River Primary School is due to a number of factors:
 - The introduction of The Balanced System® across the County, which is upskilling mainstream staff, providing a strategic approach to supporting pupils with speech and language needs. This means that the needs of a greater number of pupils can be met within their local school rather than through an SRP.
 - There are increasing numbers of pupils with additional communication needs rather than solely speech and language, in particular, autistic spectrum disorder (ASD). Therefore, we need to commission SRP places which have the resources and facilities to support pupils who have multiple communication needs, including speech language and communication needs (SLCN) and ASD.
 - Whilst the number of pupils supported by River's SRP has fallen, the number supported by the SRP at Whitfield Aspen School has grown significantly (by over 100 places since 2015). This is the largest primary SRP in the Local Authority (LA) and has the existing resources and expertise to support pupils with multiple need types including SLCN and ASD.
- 3.2 Pupils are placed in SRPs by the LA SRP panel. The SRP Panel is part of the decision making process for pupils with EHCPs, and they determine whether a

child's needs could be met via a mainstream school with SRP support. In the academic year 2024-25 the SRP panel considered 1,370 cases. Of which 448 cases were agreed as SRP appropriate.

- 3.3 Data for 2024-25 (Figure 1) shows that across Kent, 79% of cases considered by the SRP panel were for children and young people with ASD as their primary need type. 12% of cases related to SLCN as the primary need.

Figure 1: SEN type by area presented to SRP Panel (2024-25)

	Total	ASD	SLCN	Other
East Kent	478	362	53	63
North Kent	360	271	65	24
South Kent	317	266	23	28
West Kent	215	178	19	18
Total	1370	1077	160	133

- 3.4 Across South Kent, of the 317 cases considered, 271 (84%) involved children and young people with ASD as their primary need type (higher than the Kent average), whilst only 65 (7%) for SLCN (lower than the Kent average). It is clear from the data that there is a need for SRP provision which will better meet the needs of ASD pupils.
- 3.5 The growing numbers in the SRP at Whitfield Aspen School is evidence of the need for SRPs to provide for a wider need type.
- 3.6 The Commissioning Plan for Education in Kent 2026-30 sets out our commissioning intentions regarding education provision. This needs to be read alongside the SEND Sufficiency Plan which details SEND commissioning intentions. Both documents were approved in November 2025 (Decision Number 25/00099). In addition, the review of specialist resourced provision and future commissioning intentions was approved at the same meeting (Decision Number 25/00085). These documents outline that, across Dover District, we are intending to commission a new 14 place primary SRP at The Downs CE Primary School in Walmer (ASD/SLCN), a new secondary 20 place SRP at St. Edmund's Catholic School (ASD/SLCN) and to expand the secondary SRP at Dover Christ Church academy (PSCN) by 35 places. The link the three documents can be found here:

[25 00099 Kent Commissioning Plan.pdf](#)

[25 00099 SEND Sufficiency Plan.pdf](#)

[25 00085 Review of Specialist Resourced Provision](#)

4. Outcome of informal consultation

- 4.1 An informal consultation was held between the 10th of November and 8th December 2025 on the proposal to remove the SRP at River Primary school at the end of the 2025/26 academic year. The consultation was shared with the following stakeholder groups:

- All parents/carers at River Primary School
- All schools in the Dover District

- Kent PACT
- Relevant charities
- Local KCC Members
- Dover District Council
- Dover Town Council
- River Parish Council
- Mike Tapp MP
- The Clinical Commissioning Group
- The Dioceses of Canterbury and Southwark.
- Unions supporting teaching and non-teaching staff

- 4.2 A public drop in was held on Monday 24th November. Only one stakeholder attended.
- 4.3 The consultation was published on Let's Talk Kent for 4 weeks between 10th November and 9th December 2025. The consultation was viewed 175 times and there were 17 downloads of the consultation information.
- 4.4 There were 48 responses to the consultation, 45 via Let's Talk Kent web page and 3 via email. 41 of the responses were submitted on the last day of the consultation period. Of the 48 responses, 2 were in favour and 46 were against. 45 of the responses were from parents/carers, 1 from a governor and 2 from other parties. Comments were received from 26 respondents which have been included in full at Appendix B except where personal details have been omitted.
- 4.5 Below is a summary of the themes against the proposal, with comments in response. Where more than one response to a theme was received, the number of similar responses are noted in brackets

- **The SRP has had a positive impact on pupils. (8). The removal of the SRP would have a detrimental/negative impact on pupils (12):** Should the SRP be removed, the school and the LA are committed to work with the families and pupils who would have been on roll in the SRP to ensure their needs are met.

The school leaders believe that the removal of the SRP will enable the school to enhance SEND support through their 'Mainstream Plus' offer. They will reallocate resources, including the space used by the SRP, to provide a more inclusive educational environment for all pupils. The school will continue to have access to SEND support and funding in line with all mainstream schools.

- **The SRP provides support for more than those on roll in the SRP (6):** This has been the case as the numbers on roll in the SRP have been lower than the commissioned numbers funded and therefore, there has been the financial and physical capacity for additional in-reach for those pupils who are not on the SRP's roll. There are currently three pupils who have access to the SRP through in-reach. The school is already looking at possible adapted provision for those pupils and a wider group of children across the school who have cognition and learning needs and/or speech language and communication needs utilising the SRP space. School leaders believe this will be an efficient use of resources, benefiting a wider group of children. Additionally, this will be

a longer term inclusive solution to maximise the mainstream offer, thus reducing the demand for EHCPs, in line with the KCC Countywide Approach to Inclusive Education.

- **Removing the SRP would mean that pupils will have to move (2). Without the SRP funding children currently accessing the SRP will not get the support they need. (4):** It is not expected that any pupil on roll at the River, either in the SRP or who may have been supported by the SRP via in-reach or out-reach will have to move. Should the SRP be removed, the school and the LA are committed to work with the families and pupils who would have been on roll in the SRP to ensure their needs are met.
- **The Balanced system has helped up skill teaching staff but the needs of pupils (in an SRP) is beyond the capacity of a mainstream school. Pupils with delayed language disorder would not advance as well in a mainstream school:** The Balanced System®, adopted by KCC and NHS in Kent, is a strategic, outcomes-based framework designed to improve the commissioning and delivery of services for children and young people with speech, language, and communication needs (SLCN). Only two pupils have joined the SRP in recent years from other mainstream schools and there has been a lack of consultations for places in the SRP. This would suggest that the Balance System® is supporting pupils to remain in mainstream schools. For some pupils who have an EHCP due to a speech, language and communication need (such as a delayed language disorder), it may be the case that a place in an SRP or special school will be required. If this is the case, this will be identified through the EHCP assessment processes or through an annual review where an EHCP is already in place.

The SLCN provision in the wider school is recognised as good by the link therapists and is supported by the Balanced System. The school is one of 6 across the County working with professionals from speech and language link this year in a pilot project to support them in developing resources that will benefit mainstream pupils with SLCN moving forward. SLCN needs continue to be met in the school's mainstream provision. Speech and language is no longer the biggest area of SEND need in the school or the district. Social emotional and mental health needs followed by autistic spectrum disorder are the highest identified needs within the school.

- **The closure will put pressure on Whitfield Aspen, River would be an alternative to Whitfield Aspen (3), Whitfield Aspen only takes the most severe needs and would not be able to support all.:** It is true that the SRP at Whitfield Aspen has been under pressure for places in recent years. This is due to SRPs needing to support pupils with multiple communication needs. It has a variety of pathways to support 'SRP appropriate' pupils with varying need types and who require varying levels of support. It is not expected that the closure of the SRP at River will increase the pressure at Whitfield Aspen given the low numbers currently on roll. For River to be an alternative to Whitfield Aspen it would need to broaden its designation, supporting pupils with ASD who are deemed as SRP appropriate for instance.'
- **The proposal discriminates against the pupils on roll as there is no alternative available:** We do not believe that pupils are being discriminated

against should the SRP be removed. Pupils who have been on roll in the SRP will continue to receive the support they require their last year at River.

For those who have been supported through in-reach or out-reach previously, the school will adapt their provision to ensure they continue to receive the support that they require.

- **An SRP in Deal/Walmer would be of benefit but an SRP in Dover is still required:** There is already an SRP in Dover Town at Whitfield Aspen which provides for SRP appropriate pupils with multiple needs including SLCN. It is the largest primary SRP across the County. As of January 2025, 35 pupils resident across Walmer/Deal/ Sandwich and the surrounding villages attended the SRP at Whitfield Aspen. A new provision in Walmer will enable pupils to receive the support from an SRP nearer to where they live.
- **KCC do not support EHC Plans, which is why more children access the SRP than the 4 noted.** In Kent, 6.2% of children have an EHCP against a national figure of 5.6%. We do aim to get this figure closer to the National level by enabling schools to intervene early and offer appropriate and well-planned support, so parents do not have to rely on an ECHP to guarantee the support that their child needs.

4.6 **Views of the Local Members**

Both Cllr Defriend and Cllr Thorp (Dover Town) have been informed of the proposal. Any views received from either Member will be shared at the Children's, Young People and Education Cabinet Committee meeting.

4.7 **Views of the Governing Body**

The school leadership team assures us that there are robust plans in place to support the SRP pupils who will complete Year 6 at River Primary School.

The school is already exploring possible adapted provision for a wider group of children across the school, including the small number who have received in-reach, to support cognition and learning and speech language and communication needs using the SRP space. We feel this is an efficient use of resources and will benefit a wider group of children at River Primary School. It will be a longer term solution, maximising our mainstream offer, thus reducing the demand for EHCPs, in line with the KCC Countywide Approach to Inclusive Education (CATIE). We recognise the importance of continuing to provide tailored support that meets the diverse needs of our cohort.

Governors understand that within the school and district, speech and language is no longer our biggest area of SEND. Hence fewer children needing EHCPs for purely speech and language, the school only having 4 SRP pupils currently and a lack of consultations for places within the SRP.

Currently, social emotional and mental health needs, followed by autistic spectrum disorder, are the highest identified needs within River Primary School. Moreover, provision for speech and language has improved across the county, more effectively meeting the need in a mainstream setting. At River, the leadership and SEN teams continue to lead initiatives across the wider school to support a diverse range of needs.

We will hold a drop-in session to address any parental concerns in the new year.

5. Options considered and dismissed, and associated risk

- 5.1 The option to keep the SRP open for purely speech and language needs was not viable as there are an insufficient number of SRP appropriate pupils identified to keep the provision viable. The changing needs of pupils mean that SRPs now need to provide for pupils who may have wider communication needs in addition to purely speech and language. The addition of a 14 place primary SRP in Walmer for pupils with SLCN and ASD will increase SRP places for primary aged pupils who have wider communication needs. In addition, this will spread provision across Dover district offering the opportunity for pupils with additional needs to access a provision closer to where they live.
- 5.2 The option of broadening the need type that the SRP can support, was considered and discarded as the accommodation and site constraints at River Primary School mean the premises do not lend themselves easily to supporting other need types, such as ASD, within an SRP setting.

6. Financial Implications

- 6.1 No capital funding is required to implement the proposal.
- 6.2 Places in the SRP are paid by KCC on an annual basis and funded from the High Needs Block of the Dedicated Schools Grant, a specific ring-fenced grant from the Department of Education. There are no General Fund implication to this request. Appropriate ongoing revenue funding will continue to be provided to support the current pupils in school.
- 6.3 The SRP is currently commissioned for 12 places where only 4 are being occupied. The local authority must pay for places regardless of whether they are filled or not. If vacant these places are paid at £10,000 per vacant place or £80,000 in total. This would increase to £100,000 when the 2 children leave at the end of year 6. Whilst it is recognised the School would require funding for a minimum number of places to ensure ongoing sustainability, for this provision to remain open would not be considered value for money. This saving will ultimately be reinvested to cover future revenue costs of a wider increase in SRP places (in line with a SEN financial recovery plan) outlined as part of the SRP Review and future Commission intentions ([key decision - 25/00085 - Specialist Resource Provision Review and Commissioning Intentions](#)).

7. Legal implications

- 7.1 The proposal to remove the current provision is required to go through the statutory process under the School Organisation (Prescribed Alterations to Maintained Schools) (England) Regulations 2013.
- 7.2 Should the Cabinet Member for Education and Skills agree to proceed to the next stage, a public notice of the Council's intention to close the SRP will be

issued and a further 4 week representation period will commence. Following this a final decision will be made by the Council.

8. Equalities Impact Assessment (EqIA)

- 8.1 An EqIA has been completed. This finds that the proposals will have little impact on protected groups.
- 8.2 The two pupils who are currently on the roll of SRP and would still be on roll at River, will continue to receive high-quality teaching and learning support to achieve the outcomes identified in their education and health care plan (EHCP).
- 8.3 For those pupils who may have a recognised disability (such as ASD) and who are not deemed as 'SRP appropriate' but have been supported by the SRP through in-reach or out-reach, the school will continue to support them through their current inclusive practices and through their 'Mainstream Plus' offer.
- 8.4 The resources freed up by this proposal can be utilised to create provision for pupils who have multiple communication issues (speech language and communication needs and autistic spectrum disorder for instance), which will have a positive impact.
- 8.5 Should there be a requirement for any staffing restructure, the equalities impact assessment will be reviewed to assess the impact on protected groups.

9. Data Protection Implications

- 9.1 A DPIA is not required.

10. Other corporate implications

- 10.1 The proposal will require KCC to issue a public notice and run a statutory consultation. We will require support from the Authority's Engagement and Consultation Team.
- 10.2 The SEND Improvement Advisor and the Speech and Language Therapist (SALT) will ensure that the support for the two pupils on roll in the SRP aligns with the outcomes identified in their EHCP.

11. Governance

- 11.1 The Cabinet Member for Education and Skills will be asked to make a decision in line with the Proposed Record of Decision.
- 11.2 The Corporate Director of Children, Young People and Education would inherit the authority to issue the public notice and, in consultation with the Cabinet Member (Education and Skills), to determine the proposal and implement this if agreed.

12. Conclusions

- 12.1 The Balanced System® is supporting pupils with speech and language needs in mainstream schools. The Council's SRPs need to be directed to meeting the changing needs of children and young people. Evidence shows this is increasingly those with wider communication needs such as SLCN and ASD. The existing accommodation and site constraints at River do not lend themselves easily to the School's SRP adapting in this. Should the SRP remain open designated as it is, it is likely that two places would be commissioned for 2026-27 and none thereafter. In essence, the school at that point may still have a speech and language specialist designation, but no SRP places funded.
- 12.2 It is acknowledged that the consultation were overwhelmingly against the proposal to remove the SRP. However, the school's leaders believe removing the SRP will enable them to better support pupils on roll who have SEND. They are already developing adapted provision to support cognition and learning and speech language and communication needs using the SRP space. This is an efficient use of resources and will benefit those who have previously received in-reach and a much wider group of children across the school with additional SEND needs.
- 12.3 The proposal will free up KCC's resources to be utilised to create provision elsewhere which would better support pupils and families across Dover District, such as the new primary SRP for ASD/SLCN proposed at The Downs CE Primary School in Walmer.
- 12.4 Given the above, the removal of the SRP is recommended.
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13. Recommendation(s):

That the Cabinet Member consider the following proposals:

- I. Issue a Public Notice to permanently remove the specialist resource provision for pupils with speech and language needs at River Primary school, and following a representation period of four weeks with no substantive objections received, then implement the decision;
 - II. Authorise the Corporate Director Children, Young People and Education to take all steps necessary to issue a Public Notice; and
 - III. Authorise the Corporate Director Children, Young People and Education, in consultation with the Cabinet Member for Education and Skills, to take relevant actions, including but not limited to entering into relevant contracts or other legal agreements as required, to implement the decision, subject to there being no new substantive objections received during the notice period.
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14. Background Documents

14.1 The background documents are as follows:

- Equality Impact Assessment
- Commissioning Plan for Education Provision in Kent 2026-20
[25 00099 Kent Commissioning Plan.pdf](#)
- Special Educational Needs and Disability Sufficiency Plan
[25 00099 SEND Sufficiency Plan.pdf](#)

- **Specialist Resourced Provision Review and future commissioning intentions**
[25 00085 Review of Specialist Resourced Provision](#)
- **Appendix A : ROD**

Contact details

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