EQIA Submission – ID Number
Section A

EQIA Title
Specialist Resource Provision Review and Commissioning Intentions

Responsible Officer
Marisa White - CY EDSEN

Approved by (Note: approval of this EqIA must be completed within the EqIA App)
Siobhan Price - CY EDSEN

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 EDSEN

Responsible Director
Christine McInnes - CY EDSEN

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

Do you have data related to the protected groups of the people impacted by this activity?

Yes

It is possible to get the data in a timely and cost effective way?

Yes

Is there national evidence/data that you can use?

Yes

Have you consulted with stakeholders?

No

Who have you involved, consulted and engaged with?

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:
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).

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

Has there been a previous Equality Analysis (EQIA) in the last 3 years?

No

Do you have evidence that can help you understand the potential impact of your activity?

Yes

Section C – Impact

Who may be impacted by the activity?

Service Users/clients

Service users/clients

Staff

Staff/Volunteers

Residents/Communities/Citizens

No

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

Yes

Details of Positive Impacts

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

20. Negative impacts and Mitigating actions for Disability
Are there negative impacts for Disability?
Yes
Details of Negative Impacts for Disability
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. 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.
Mitigating actions for Disability
1. The option of an SRP with a different designation if the child/young person also had other SEND needs would remain open. 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.
Responsible Officer for Disability
Rory McDonnell – Head of Specialist Teaching Service
21. Negative Impacts and Mitigating actions for Sex
Are there negative impacts for Sex
No
Details of negative impacts for Sex
Not Applicable
Mitigating actions for Sex
Not Applicable
Responsible Officer for Sex
Not Applicable
22. Negative Impacts and Mitigating actions for Gender identity/transgender
Are there negative impacts for Gender identity/transgender
No
Negative impacts for Gender identity/transgender
Not Applicable
Mitigating actions for Gender identity/transgender
Not Applicable
Responsible Officer for mitigating actions for Gender identity/transgender
Not Applicable
23. Negative impacts and Mitigating actions for Race
Are there negative impacts for Race
No
Negative impacts for Race
Not Applicable
Mitigating actions for Race
Not Applicable
Responsible Officer for mitigating actions for Race
Not Applicable
24. Negative impacts and Mitigating actions for Religion and belief
Are there negative impacts for Religion and belief
No
Negative impacts for Religion and belief

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