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Date: 16/11/2024

Dear Member

**CHILDREN'S, YOUNG PEOPLE AND EDUCATION CABINET COMMITTEE - THURSDAY, 21 NOVEMBER 2024**

Please find enclosed appendices relating to Items 6 and 12 which were available via links included in the original agenda pack. They are provided now in full published format for completeness and ease of reference.

In addition, this supplement pack contains all reports for Item 10 – Decision 24/00097 Special School.

**Agenda Item No**

- |    |                                                                                                       |
|----|-------------------------------------------------------------------------------------------------------|
| 6  | <b><u>24/00093 - Commissioned Family Hub Contracts</u></b> (Pages 1 - 76)<br>Appendices for reference |
| 10 | <b><u>24/00097 Special School Review</u></b> (Pages 77 - 250)<br><br>All substantive reports          |
| 12 | <b><u>24/00096 Kent Commissioning Plan Update</u></b> (Pages 251 - 388)<br>Appendices for reference   |

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ben Watts', is written over a faint, illegible printed name.

Benjamin Watts  
General Counsel

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# KENT COUNTY COUNCIL SEASHELLS AND MILLMEAD FAMILY HUB CONSULTATION WRITTEN REPORT

PREPARED BY LAKE MARKET RESEARCH



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# BACKGROUND AND METHODOLOGY

## Background

Millmead and Seashells are the only two externally commissioned Family Hubs in Kent. The rest of the Family Hub provision is run directly by KCC. KCC are proposing not to get new contracts in place and instead provide services that people can access from other locations, ensuring a consistent approach in all areas of Kent.

This consultation is about the future of two commissioned Family Hubs contracts in Kent: Millmead Family Hub in Margate and Seashells Family Hub in Sheerness. Currently, Kent County Council (KCC) pay for external providers to run Family Hub services in these locations and their contracts are due to end on 31 March 2025. This consultation focuses only on the commissioned Family Hub services and does not include any of the other activities such as the nursery provision, food banks or multiple other services at each site.

KCC must decide whether to put new contracts for delivery of Family Hub services in place (re-procure the contracts) or not. If KCC do get new contracts in place, they would be required to run a new process which would be open to the current providers and any new providers to bid for the contracts.

## Consultation process

On 30 July 2024, a public consultation was launched, lasting just under 8 weeks until 22 September 2024. The consultation invited responses from all those interested in the proposals, including those that use / have used family hub services at either of the two commissioned family hubs.

Feedback was captured via a consultation questionnaire which was available on the KCC engagement website ([www.kent.gov.uk/familyhubsconsultation](http://www.kent.gov.uk/familyhubsconsultation)). Hard copies of the consultation material, including the questionnaire, were made available at Millmead and Seashells Family Hubs were also available on request. 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 for people who did not wish to complete the online version. An easy read version of the consultation document and questionnaire was also available.

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

- Email sent to stakeholders.
- Email sent to those registered with Let's talk Kent (KCC's engagement platform) who had expressed an interest in being kept informed of consultations about 'children and families' and 'schools and education' in Thanet and Swale (2,152 people).
- Additional email sent to Let's talk Kent participants about the drop-in sessions.
- Media release issued: [Have your say on the future of commissioned Family Hub services - 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.

- Posters and promotional postcards available at Millmead Family Hub and other local hubs (Cliftonville Family Hub, Margate Family Hub, and Northdown Road Family Hub).
- Posters and promotional postcards available at Seashells Family Hub and Sheppey Gateway.
- Information added to relevant pages on kent.gov.uk.

There were also some face-to-face engagement events:

- Millmead Family Hub
- Margate Family Hub
- Seashells Family Hub
- Sheppey Gateway

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

- 6,257 visits to the consultation webpage by 5,627 visitors during the consultation period.
- Organic posts via KCC’s corporate channels had a reach of 28,881 on Facebook and Instagram. There were 48,909 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 725 clicks through to the consultation webpage. (Not all social media platforms report the same statistics).
- The number of document downloads from the website are show in the table below:

<b>Document name</b>	<b>Downloads / views</b>
Consultation document	632
Equality Impact Assessment	145
Residents questionnaire (Word version)	47
Millmead Consultation Document - Easy Read version	38
Seashells Consultation Document - Easy read version	29
Seashells Consultation Questionnaire - Easy read version	9
Millmead Consultation Questionnaire - Easy read version	5

## Points to note

- Consultees were invited to comment on each aspect of the consultation and were given the choice of which questions they wanted to answer / provide comments. The number of consultees providing an answer is shown on each chart / table featured in this report.
- 672 consultees chose to answer questions regarding Seashells Family Hub in Sheerness, Swale, and 433 consultees chose to answer questions regarding Millmead Family Hub in Margate, Thanet. 99 consultees chose to answer questions about both Family Hubs.
- Consultees were given a number of opportunities to provide feedback in their own words throughout the questionnaire. This report includes examples of verbatims received (as written by those contributing) but all free text feedback is being reviewed and considered by KCC.
- This report includes feedback from residents and professionals / organisations and the consultation contained a separate questionnaire for each stakeholder group. Feedback for each stakeholder group has been reported separately.
- Participation in consultations is self-selecting and this needs to be considered when interpreting responses.
- Response to this consultation does not wholly represent the individuals or stakeholders the consultation sought feedback from and is reliant on awareness and propensity to take part based on the topic and interest.
- Additional feedback received during the consultation in the form of emails, letters and verbal conversations at drop-in events has been summarised and is available within the appendices.
- KCC was responsible for the design, promotion, and collection of the consultation responses. Lake Market Research was appointed to conduct an independent analysis of feedback.

## Profile of **resident consultees** responding

1,016 consultees took part in the consultation questionnaire.

The table below shows the profile of consultees responding to the consultation questionnaire only. The proportion who left this question blank or indicated they did not want to disclose this information has been included as applicable.

<b>RESPONDING AS...</b>	<b>Number of consultees answering</b>	<b>% of consultees answering</b>
A Kent resident	887	87%
On behalf of a friend or relative	25	2%
A resident from somewhere else	3	0%
Other	18	2%
Prefer not to answer / left blank	83	8%

<b>GENDER</b>	<b>Number of consultees answering</b>	<b>% of consultees answering</b>
Male	134	13%
Female	653	64%
Prefer not to answer / left blank	229	23%

<b>GENDER SAME AS BIRTH</b>	<b>Number of consultees answering</b>	<b>% of consultees answering</b>
Yes	760	75%
No	1	0%
Prefer not to answer / left blank	255	25%

<b>AGE</b>	<b>Number of consultees answering</b>	<b>% of consultees answering</b>
0-15	21	2
16-24	57	6
25-34	275	27
35-49	256	25
50-59	74	7
60-64	40	4

<b>AGE</b>	<b>Number of consultees answering</b>	<b>% of consultees answering</b>
65-74	45	4
75-84	19	2
85 & over	2	0.2%
Prefer not to answer / left blank	227	22%

<b>PRESENCE OF CHILDREN</b>	<b>Number of consultees answering</b>	<b>% of consultees answering</b>
I/we have children	641	63%
- 0-1 year old	225	22%
- 2-5 years old	319	31%
- 6-10 years olds	187	18%
- 11-19 years old	177	17%
I am / we are expecting a child	62	6%
I/we do not have children	79	8%
Prefer not to answer / left blank	234	23%

<b>RELIGION / BELIEF</b>	<b>Number of consultees answering</b>	<b>% of consultees answering</b>
Yes	228	22%
- Christian	185	18%
- Hindu	5	0.5%
- Jewish	3	0.3%
- Muslim	11	1%
- Sikh	2	0.2%
- Other	15	1%
No	502	49%
Prefer not to answer / left blank	286	28%

<b>DISABILITY</b>	<b>Number of consultees answering</b>	<b>% of consultees answering</b>
Yes	186	18%
- Physical impairment	71	7%
- Sensory impairment (hearing, sight or both)	17	2%
- Longstanding illness or health condition, such as cancer, HIV/AIDS, heart disease, diabetes or epilepsy	82	8%
- Mental health condition	87	9%
- Learning disability	39	4%
- Other	10	1%
No	553	54%
Prefer not to answer / left blank	277	27%

<b>CARER</b>	<b>Number of consultees answering</b>	<b>% of consultees answering</b>
Yes	178	18%
No	569	56%
Prefer not to answer / left blank	269	26%

<b>ETHNICITY</b>	<b>Number of consultees answering</b>	<b>% of consultees answering</b>
White English	665	65%
White Scottish	5	0.5%
White Welsh	4	0.4%
White Northern Irish	3	0.3%
White Irish	6	1%
White Irish Traveller	3	0.3%
Asian or Asian British Indian	5	0.5%
Asian or Asian British Pakistani	5	0.5%
Asian or Asian British Bangladeshi	3	0.3%
Mixed White & Black Caribbean	10	1%
Mixed White & Black African	6	1%
Mixed White & Asian	5	0.5%

<b>ETHNICITY</b>	<b>Number of consultees answering</b>	<b>% of consultees answering</b>
Black or Black British Caribbean	1	0.1%
Black or Black British African	9	1%
Other	41	4%
Prefer not to answer / left blank	245	24%

<b>SEXUALITY</b>	<b>Number of consultees answering</b>	<b>% of consultees answering</b>
Heterosexual/Straight	686	68%
Bi/Bisexual	29	3%
Gay man	3	0.3%
Gay woman/Lesbian	10	1%
Other	3	0.3%
Prefer not to answer / left blank	285	28%

## Profile of **professionals / organisation** consultees responding

95 consultees took part in the consultation questionnaire.

The table below shows the profile of consultees responding to the consultation questionnaire only. The proportion who left this question blank or indicated they did not want to disclose this information has been included as applicable.

<b>RESPONDING AS...</b>	<b>Number of consultees answering</b>	<b>% of consultees answering</b>
Community-based midwifery staff	3	3%
Health Visiting staff	12	13%
Staff from another health-related organisation	10	11%
As any other professional working in an organisation that supports children, young people or families	22	23%
On behalf of a Parish / Town / Borough / District Council in an official capacity	3	3%
As a Parish / Town / Borough / District / County Councillor	3	3%
On behalf of a charity, voluntary or community sector organisation (VCS)	17	18%
Other (current / previous volunteers / employees at Family Hubs, work in public sector)	11	12%
Prefer not to answer / left blank	14	15%



# EXECUTIVE SUMMARY

## RESIDENT FEEDBACK – SEASHELLS FAMILY HUB

- 672 consultees chose to answer questions about the Seashells Family Hub. Just under two thirds of consultees answering (63%) indicated they use services at Seashells Family Hub. 20% do not currently services at the Hub but have done so in the past; 16% of consultees answering have not used services at the Hub.
- When asked to detail the impact that accessing Family Hub services at the Sheppey Gateway would have on themselves and / or their family, the common themes reported are as follows:
  - A desire for Seashells Family Hub not to close as it an integral part of the local community / used by many families and closing it would have a huge impact (32%)
  - The Sheppey Gateway will not be able to offer the same level of service / its not able to house all of the services offered at the Seashells Family Hub (25%)
  - The Seashells Family Hub is invaluable for the children who use it in terms of their development, enjoyment, wellbeing and socialising opportunities (23%)
  - The staff at Seashells are welcoming and supportive / concerned they will lose their jobs (21%)
  - Seashells offers key support to parents / babies / new mums and is invaluable for parents raising their children (17%)
- When asked to comment on the Equality Analysis put forward for the Seashells Family Hub proposal and if there was anything that should be considered relating to equality and diversity, the common themes reported are as follows:
  - Reiterated points / reasons consultees believe the Seashells Family Hub should not close (35%) and the Sheppey Gateway should not be used (23%)
  - Perceptions that Seashells Family Hub being inclusive / focused on equality and is an environment where everyone is welcome (20%)
  - Seashells Family Hub serves some of the most vulnerable and deprived residents / areas and that the proposed move discriminates against these demographic groups / people living in Sheerness (14%).

## RESIDENT FEEDBACK – MILLMEAD FAMILY HUB

- 433 consultees chose to answer questions about the Millmead Family Hub. Just under three quarters of consultees answering (73%) indicated they use services at Millmead Family Hub. 18% do not currently services at the Hub but have done so in the past; 10% of consultees answering have not used services at the Hub.
- When asked to detail the impact that accessing Family Hub services at the Sheppey Gateway would have on themselves and / or their family, the common themes reported are as follows:

- Millmead Family Hub is local / accessible / mums with pushchairs can walk there / mums postpartum can access and that many wouldn't be able to go elsewhere / unable to afford the bus / alternatives are uphill / inaccessible to mums on foot (53%)
- Millmead Family Hub must not be closed / it's a much-needed resource / relied upon by many families / offering lots to local families and believing closure would be devastating (37%)
- Perceptions lots of deprived children attend Millmead Family Hub / it is invaluable for their development / enjoyment / wellbeing / socialising skills (22%)
- Staff at Millmead Family Hub are welcoming / supportive / they trust them and they / their children have developed close relationships with them (16%)
- When asked to comment on the Equality Analysis put forward for the Millmead Family Hub proposal and if there was anything that should be considered relating to equality and diversity, the common themes reported are as follows:
  - Reiterated points / reasons consultees believe the Millmead Family Hub should not close (36%)
  - Requests for considerations for those who cannot use or pay for transport (20%)

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## PROFESSIONAL / ORGANISATION FEEDBACK – SEASHELLS FAMILY HUB

- When asked to detail the impact that accessing Family Hub services at the Sheppey Gateway would have on children, young people and families, the most common themes expressed are consistent with feedback received from the residents component of the consultation. They include:
  - Concern about leaving a well-established place / environment that is well used and trusted by local community, which is particularly important in an area of deprivation
  - Concern services and available parking offered at Sheppey Gateway would be more limited than at Seashells Family Hub / valued services would reduce
  - Concern about appropriateness of Sheppey Gateway in terms of safety / comfort for its users, location and sharing the building with other organisations / services
- When asked to describe the impact they think accessing Family Hub services at the Sheppey Gateway would have on other services and organisations, the most common themes expressed include the following:
  - Concern for impact on Seashells Family Hub services / other services currently in Seashells Family Hub building resulting in further loss of services and inability for services to work together
  - Concern for impact on residents / service users needing to use other statutory services / health and care services / other services that are already stretched

- When asked to express any views on the equality analysis undertaken and whether there is anything else that should be considered, the most common themes expressed include the following:
  - Concern about the impact on travelling to Sheppey Gateway / physical access to Sheppey Gateway in terms of public transport / users with disabilities
  - Concern that proposals do not consider the relationship and trust that users have with the Seashells Family Hub / services offered / staff

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## PROFESSIONAL / ORGANISATION FEEDBACK – MILLMEAD FAMILY HUB

- When asked to detail the impact that accessing services at a different Family Hub, like Margate (Six Bells), Cliftonville or Northdown Road, would have on children, young people and families, the most common themes expressed are consistent with feedback received from the residents component of the consultation. They include:
  - Concern about leaving a well-established place / environment that is well used and trusted by local community, which is particularly important in an area of deprivation
  - Concern current users / residents local to Millmead Family Hub would not travel to visit other centres / services due to lack of available income to travel / deprivation / having to use public transport to get there
  - Concern about impact on local area / already an area that has lost services / is in need of Millmead Family Hub / an area of significant deprivation
- When asked to describe the impact they think accessing services at a different Family Hub, like Margate (Six Bells), Cliftonville or Northdown Road, would have on other services and organisations, the most common themes expressed include the following:
  - Concern for impact on Millmead Family Hub services / other services currently in Millmead Family Hub building resulting in further loss of services and inability for services to work together
  - Concern for impact on using other statutory services / health and care services / other services already stretched
- When asked to express any views on the equality analysis undertaken and whether there is anything else that should be considered, the dominant theme expressed is concerns for access to alternative services / alternative hubs / family hubs / children’s centres<sup>1</sup> amongst vulnerable groups.

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<sup>1</sup> Verbatim comments refer to Family Hubs and Children’s Centres. Children’s centres now operate within Family Hubs.

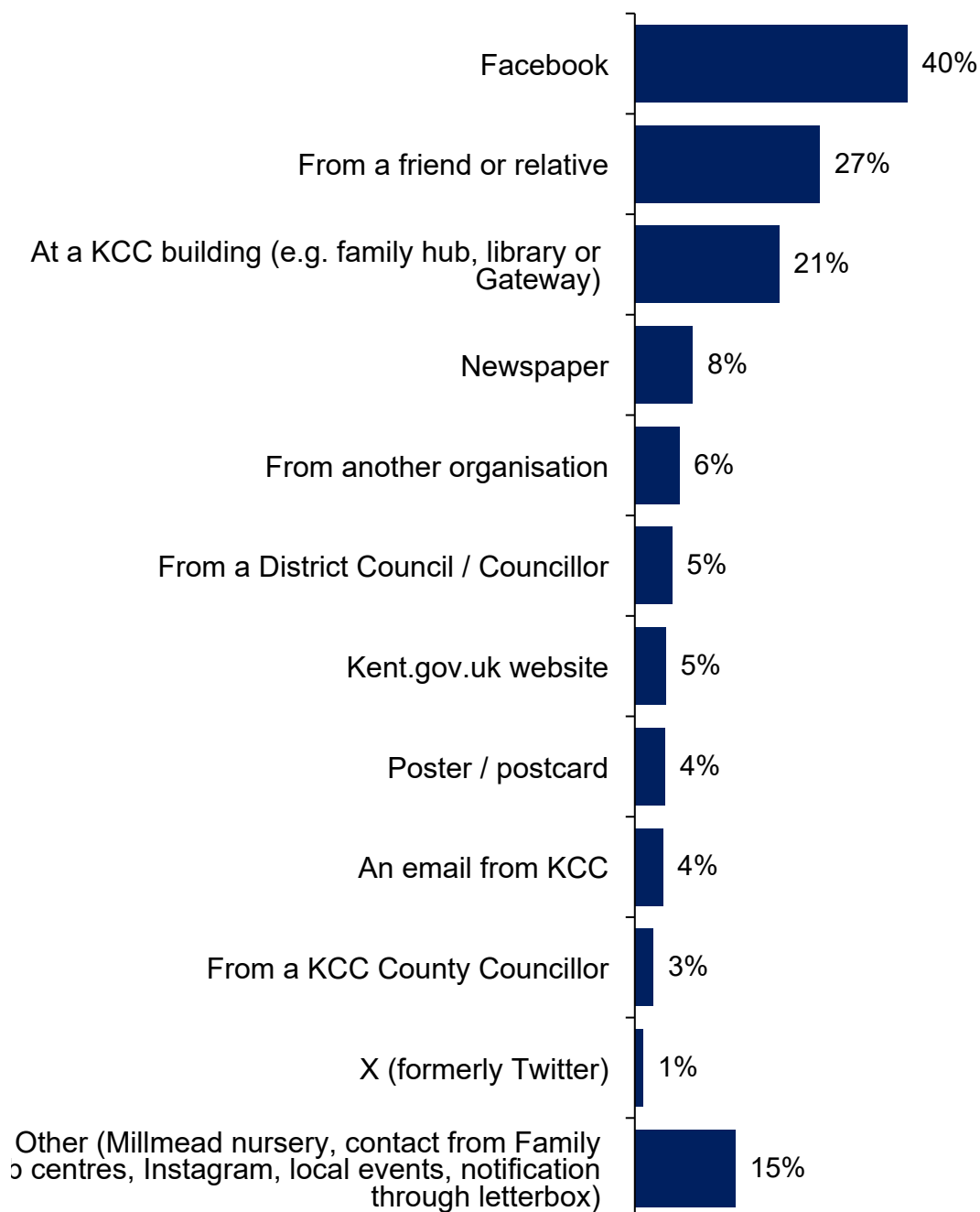
## RESIDENT FEEDBACK

## CONSULTATION AWARENESS

- The most common route to finding out about the consultation is via Facebook (40%), followed by a friend or relative (27%) and a KCC building (e.g. family hub, library or Gateway) (21%).

### How did you find out about this consultation?

Base: all answering (926), consultees had the option to select more than one response.



<b>SUPPORTING DATA</b>	<b>Number of consultees answering</b>	<b>% of consultees answering</b>
Facebook	367	40%
From a friend or relative	249	27%
At a KCC building (e.g. family hub, library or Gateway)	194	21%
Newspaper	78	8%
From another organisation	60	6%
From a District Council / Councillor	50	5%
Kent.gov.uk website	42	5%
Poster / postcard	41	4%
An email from KCC	38	4%
From a KCC County Councillor	25	3%
X (formerly Twitter)	11	1%
Other (Millmead nursery, contact from Family Hubs, Instagram, local events, notification through letterbox)	135	15%

There are significant differences by demographic subgroup and current users and non-users of the two Family Hubs:

- A higher proportion of female consultees found out through Facebook (44%) compared to male consultees (22%).
- A higher proportion of consultees aged 25-34 found out at a KCC building (e.g. family hub, library or Gateway) (26%) compared to consultees aged 35-49 (24%) and consultees aged 50 and over (15%).
- A higher proportion of consultees who use services at Seashells Family Hub or have used the Hub in the past found out via Facebook (51% / 49%) compared to non-users (20%).
- A higher proportion of consultees who use services at Millmead Family Hub found out at a KCC building ((e.g. family hub, library or Gateway) (34%) compared to consultees who have used the Hub in the past (14%) or non-users (10%).

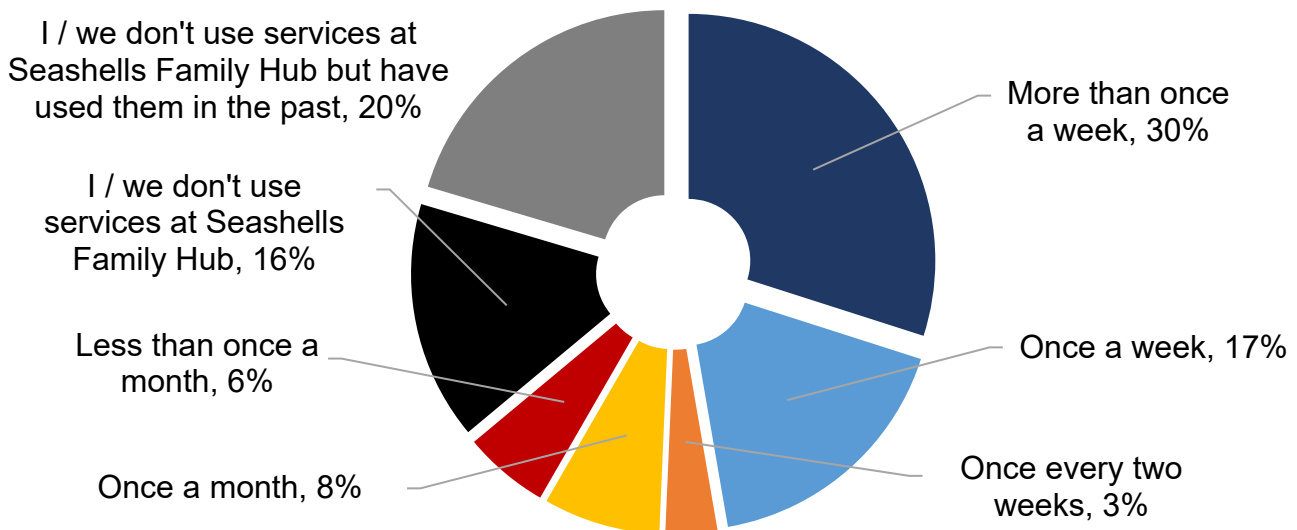
# RESIDENT FEEDBACK

## SEASHELLS FAMILY HUB

This section of the report summarises responses to the questions posed surrounding the Seashells Family Hub in Sheerness, Swale, as reported by consultees. 672 consultees chose to answer questions regarding this Hub.

### FREQUENCY OF USING SEASHELLS FAMILY HUB

- Just under two thirds of consultees answering (63%) indicated they use services at Seashells Family Hub. 47% use services there at least once a week (30% more than once a week, 17% once a week).
- A fifth of consultees answering (20%) do not currently services at Seashells Family Hub but have done so in the past. 16% of consultees answering have not used services at the Hub.



SUPPORTING DATA TABLE	Number of consultees answering	% of consultees answering
Net: Use Seashells currently (any frequency)		64%
More than once a week	176	30%
Once a week	102	17%
Once every two weeks	20	3%
Once a month	45	8%
Less than once a month	33	6%
I / we don't use services at Seashells Family Hub	92	16%
I / we don't use services at Seashells Family Hub but have used them in the past	120	20%

There are significant differences in the proportion who currently use services at the Seashells Family Hub by age group: a higher proportion of consultees aged 25-34 and 35-49 currently use services at the Hub (74% and 68%) compared to consultees aged 50 & over (47%).

## PERCEIVED IMPACT OF ACCESSING FAMILY HUB SERVICES AT THE SHEPPEY GATEWAY ON FAMILY

- Consultees were asked to detail the impact they think accessing Family Hub services at the Sheppey Gateway would have on themselves and / or their family, in their own words.
- For the purpose of reporting, we have reviewed respondents' comments and have grouped common responses together into themes. These are reported in the table below.
- 75% of consultees who chose to answer questions about the Seashells Family Hub provided a comment at this question.
- The most common theme noted is a desire for Seashells Family Hub not to close as it an integral part of the local community / used by many families and closing it would have a huge impact (32%).
- Just under a quarter of consultees answering (23%) commented that the Seashells Family Hub is invaluable for the children who use it in terms of their development, enjoyment, wellbeing and socialising opportunities. 21% commented the staff at Seashells are welcoming and supportive / concerned they will lose their jobs. 17% commented that Seashells offers key support to parents / babies / new mums and is invaluable for parents raising their children.
- A quarter of consultees answering (25%) noted they believe the Gateway will not be able to offer the same level of service / it's not able to house all of the services offered at Seashells. 15% of consultees believe the move to Gateway will encounter safeguarding issues for the children who use it as it is on the high street / accessible to passers-by / non-users.
- There are also some concerns over access to services at the Sheppey Gateway with 13% of consultees commenting that the Seashells Family Hub is local / accessible on foot for all (including those with pushchairs / users with a disability) and many wouldn't be able to access other centres nor afford to use transport. 13% also commented that Seashells has a free accessible car park and the Shepway Gateway does not.

**Please tell us what impact you think accessing Family Hub services at the Sheppey Gateway would have on you / or your family? Base: all answering (505)**

	Number of consultees answering	% of consultees answering
Seashells must not close: vital to / an integral part of the community, used by many families; closing it would have a significant impact	160	32%
Gateway will not be able to offer the same level of service, it's not big enough, will not be able to house all the services on offer at Seashells	126	25%
Seashells is invaluable for children; their development, enjoyment, wellbeing, socialising, soft play, nursery	114	23%
Seashells / the staff are welcoming, supportive, make you feel part of a family / concern staff will lose their jobs	105	21%

	Number of consultees answering	% of consultees answering
Seashells offers key support to (new) mums / parents and babies, postpartum support and invaluable for parents raising their children	85	17%
Gateway will have safeguarding issues; for children, being on the high street / possibility of passers-by / non-users / strangers walking in	76	15%
Seashells is local, accessible on foot, with pushchairs / for the disabled; many wouldn't be able to access other centres, nor afford to use transport	68	13%
Seashells has a free accessible car park, Gateway does not	65	13%
Seashells provides a social aspect / making friends / prevents social isolation	64	13%
Seashells is a warm, safe, secure, trusted, reliable space	60	12%
Gateway is not family friendly	60	12%
If Seashells closed, we / many would be unable to attend anywhere else	51	10%
Seashells is good for mental health support, has mental health session	50	10%
Gateway is used by too many other services: banking, library, clubs	48	10%
Seashells is a lifeline to many	42	8%
Seashells has outdoor space / we have no garden / children can play outside	40	8%
Seashells is an information resource / they provide advice and signposting	38	8%
This is an area of recognised high deprivation; closing it would impact the most vulnerable / in need, pushing them further into deprivation	35	7%
Seashells is safe for children, has door release button / children can play safely / away from the busy high street	33	7%
We / many have been using Seashells for years, many regular users	26	5%
Seashells has health clinics, baby weigh clinics, health visitors	25	5%
Gateway is only open 4 days a week	23	5%
Seashells has the food bank which many rely on	22	4%
There are lots of (free) clubs, activities, sessions, groups, invaluable to many who couldn't afford otherwise	22	4%
There is no private space at the Gateway	18	4%
Taking it away will cause more social problems, including an increase in referrals to family support services	17	3%
Seashells has sensory rooms, used by many	14	3%



Some example verbatims underpinning consultees desire for Seashells Family Hub not to close as it an integral part of the local community / used by many families and closing it would have a huge impact can be found below:

**“Seashells was put where it is because that is where the greatest community need is for a group of people that struggle to access services. This may not be due just to distance but because of trust of "outsiders" and "officials". Will the building remain viable after losing £200k funding? If we lose the building other services currently in there will have nowhere to go so even more services will be lost to those communities. Seashells Centre, it is open 8:30am to 5:30pm Monday-Friday. You rightly point out that the other centres do not support their communities as robustly. There is currently a sensory hub at Seashells, and you cannot provide straight away at the Gateway. Given the financial position of KCC how will you ever be able to duplicate something already available elsewhere, particularly if this proposal is driven in part to reduce duplication? Vulnerable children need easy access to sensory support and stimulation to reduce the impact difficulties can have on them, it is a vital resource that will negatively impact outcomes for children if not appropriately supported by KCC.”**

**“All my children and myself have accessed the amazing support groups they have on offer at seashells including the baby and toddler sing and sign, breastfeeding clinic and Solihull parenting group. Seashells is an amazing asset of a building to children and families, the building is always immaculate with bright colours and welcoming as well as the staff being one large family who welcome you with open arms at the front door. Many people including myself do not like going into the high street to access certain services and feel that seashells is a safe place and a place where you can attend to seek support. Unless you yourself who are completing this consultation have had to access food banks which is embarrassing and humiliating as a parent or adult, then moving this to the middle of a high street will make it even more humiliating for us to go to. Seashells knows most people by their first name and that personal touch will not be available in the gateway due to it being one large free for all building. Sheerness does not have much at all that impacts on people’s lives, and you are taking away the only thing that they do have.”**

**“The impact of losing this facility would be great. Not only to myself and family but also to other local families. I currently access the stay and plays, mental health drop in’s as well as my daughter attending the nurse based in the building. The children’s centre offers a huge overview of options and facilities for all families in the local area, no matter their background. In particular, sheerness is a deprived area with not a lot of places offering the facilities, social gatherings and supports that Seashells does. The loss of the building will mean the loss of maternity and health visitor facilities (not everyone can get to the local hospital), the support to new mothers by offering health visitor and breastfeeding drop ins and the ever as important stay and play and children’s groups. Each child should be given the opportunity to access these facilities for the help of socialising and Learning. The centre also offers the use of food banks and money help which many access. No other building in the local area would be big enough to hold all these facilities. To lose this for the local community would be a huge issue and would show that once again, no one cares for the area or the people of Sheerness. We should be able to access the same full services as other towns.”**

Some example verbatims underpinning consultees comments regarding the Hub being invaluable for children / the staff being welcoming and supportive and offering support to parents / babies / new mums / parents raising their children can be found below:

**“It would isolate single/new parents. These facilities enable parents to meet up with other people in the same situation. It enables a support network to be formed. They help with mental health issues surrounding being a parent and help ease the burden. They also help babies and children through all early year’s developmental stages. They allow these children to socialise with others of similar ages and to meet other children where perhaps no other children are in their family network. These centres provide a wealth of opportunities for children that may not be fortunate enough to have much at home. They allow interaction, messy play which isn’t always suitable for home, outside play for children in homes without gardens and much needed support and advice for parents. Without these centres the quality of life for countless children and babies would be greatly affected. These centres provide an affordable opportunity for parents and children to have quality, fun time together in a safe environment.”**

**“During my first pregnancy I was struggling to get out the house as I didn’t have friends that had a young baby as well. My mental health was struggling. The health visitor suggested Seashells to me. I struggle with social anxiety, but my husband encouraged me to go and came with me. Whilst there I met a group of 4 women all with babies of a similar age. 2 year later we are all still friends and our babies; now toddlers are still friends. We still use seashells as much as we are able to. I have since had twins, and again Seashells has saved my mental health postpartum. I honestly don’t know what I would have done without them and the groups.”**

**“Seashells are an absolute lifeline. Without the breastfeeding support, the access to Introduction to Solids workshop or the Stay and Play sessions I do not know where I’d be - they’ve kept me sane and helped me to be a better parent. I also think that moving it to the Gateway where there is no parking or the Toddler Sing and Sign would be a real shame - both of these things are incredible for accessibility. Especially the Sing and Sign class, I cannot afford to pay for these classes which is the case elsewhere, but signing has provided me and my child invaluable communication to better our relationship and his development and autonomy.”**

Some example verbatims underpinning consultees comments regarding the Gateway not being able to offer the same level of service / house all of the services offered at Seashells and the move to Gateway encountering safeguarding issues for the children who use it can be found below:

**“There is no privacy and too many other services being offered to a variety of people. Families need consistent and tailored support, which Seashells offer. It would be criminal to take this away from our community.”**

**“Sheppey Gateway has less space than the Seashells building. It is suggested that Services will be reduced. Partner services may continue at Seashells but will be disassociated from the hub making them more inconvenient to access . Sheppey Gateway opens directly onto the High street and there is no parking, meaning parents having to find money for parking fees. It is clear through looking at education on Sheppey that much more needs to be done to support children and families to raise expectations, to improve preschool educational**

opportunities, to instil a love of learning and ambition at a young age. KCC should be looking to expand its offering to young families and so reduce the spending on dealing with older children and young adults in the future.”

“The Sheppey Gateway is not suitable for as there are many drug users, drunk people, homeless people using it. It's not the right environment for children. I'm sure the library figures have been less as since being part of the gateway and we don't go there anymore because of the safeguarding risk. The gateway also has no parking, it won't be manned when we need it and discriminates against people living in Sheerness as this will be an outreach venue only. It is completely impractical for a family hub service and all KCC is doing is being driven by a very small cut to their budget rather than putting people first.”

“Seashells is wonderful setting that everyone feels safe in. There's big grounds for outdoor play and it's separate to the gate way - the gate way is already squashed? The children's library there is inadequate, there's a lot of dodgy people around the high street - it is not welcoming and we'd also worry about our children running out onto a main road.”

## **Response filtered by current users of services at Seashells Family Hub only**

- When filtering responses to the key themes by consultees who indicated they currently use services at the Seashells Family Hub, response is broadly consistent but a higher proportion comment on the Seashells Family Hub being invaluable for the children who use it in terms of their development, enjoyment, wellbeing and socialising opportunities (29%).

### **Please tell us what impact you think accessing Family Hub services at the Sheppey Gateway would have on you / or your family? Base: all answering (343)**

	Number of consultees answering	% of consultees answering
Seashells must not close: vital to / an integral part of the community, used by many families; closing it would have a huge impact	93	27%
Gateway will not be able to offer the same level of service, it's not big enough, will not be able to house all the services on offer at Seashells	83	24%
Seashells is invaluable for children; their development, enjoyment, well-being, socialising, soft play, nursery	99	29%
Seashells / the staff are welcoming, supportive, make you feel part of a family (includes staff will lose their jobs)	77	22%
Seashells supports (new) mums / parents and babies, postpartum support, invaluable for parents raising their children	54	16%
Gateway will have safeguarding issues; for children, being on the high street, strangers walking in	53	15%
Seashells is local, accessible on foot, with pushchairs / for the disabled; many wouldn't be able to access other centres, nor afford to use transport	46	13%
Seashells has a free accessible car park, Gateway does not	51	15%
Seashells provides a social aspect / making friends / prevents social isolation	52	15%
Seashells is a warm, safe, secure, trusted, reliable space	38	11%
Gateway is not family friendly	40	12%
If Seashells closed, we / many would be unable to attend anywhere else	41	12%
Seashells is good for mental health support, has mental health session	40	12%
Gateway is used by too many other services: banking, library, clubs	30	9%
Seashells is a lifeline to many	30	9%
Seashells has outdoor space / we have no garden / children can play outside	33	10%
Seashells is an information resource / they provide advice and signposting	24	7%
This is an area of recognised high deprivation; closing it would impact the most vulnerable / in need, pushing them further into deprivation	14	4%

	Number of consultees answering	% of consultees answering
Seashells is safe for children, has door release button / children can play safely / away from the busy high street	25	7%
We / many have been using Seashells for years, many regular users	21	6%
Seashells has health clinics, baby weigh clinics, health visitors	14	4%
Gateway is only open 4 days a week	13	4%
Seashells has the food bank which many rely on	13	4%
There are lots of (free) clubs, activities, sessions, groups, invaluable to many who couldn't afford otherwise	20	6%
There is no private space at the Gateway	7	2%
Taking it away will cause more social problems, including increase in referrals to family support services	8	2%
Seashells has sensory rooms / used by many	8	2%

### **Differences in response by resident demographic**

- Further to likely usage patterns, there are some significant differences in impact perceptions by resident demographic:
  - A higher proportion of female consultees comment on the staff at Seashells being welcoming and supportive / concerned they will lose their jobs (24%) and that Seashells offers key support to parents / babies / new mums and is invaluable for parents raising their children (20%).
  - A higher proportion of consultees aged 35-49 note a desire for Seashells Family Hub not to close as it an integral part of the local community / used by many families and closing it would have a huge impact (39%).
  - A higher proportion of consultees with children 0-1 years old comment the Seashells Family Hub is invaluable for the children who use it in terms of their development, enjoyment, wellbeing and socialising opportunities (34%), Seashells offers key support to parents / babies / new mums and is invaluable for parents raising their children (25%) and Seashells provides a social aspect / place for making friends / prevents social isolation (20%).
  - A higher proportion of consultees with children 2-5 years old comment the Seashells Family Hub is invaluable for the children who use it in terms of their development, enjoyment, wellbeing and socialising opportunities (32%) and the staff at Seashells being welcoming and supportive / concerned they will lose their jobs (26%).

## EQUALITY ANALYSIS FOR SEASHELLS FAMILY HUB PROPOSAL

- Consultees were asked to comment on the Equality Analysis put forward for the Seashells Family Hub proposal and if there was anything that should be considered relating to equality and diversity in their own words.
- For the purpose of reporting, we have reviewed respondents' comments and have grouped common responses together into themes. These are reported in the table below.
- 45% of consultees who chose to answer questions about the Seashells Family Hub provided a comment at this question.
- A significant proportion of comments noted at this question reiterate points / reasons consultees believe the Seashells Family Hub should not close (35% of consultees commenting) and the Sheppey Gateway should not be used (23% of consultees commenting).
- 20% of consultees made reference to perceptions of Seashells Family Hub being inclusive / focused on equality and is an environment where everyone is welcome. 14% commented that the Seashells Family Hub serves some of the most vulnerable and deprived residents / areas and that the proposed move discriminates against these demographic groups / people living in Sheerness.
- Comments include requests for consideration of specific demographic groups:
  - Children (without the safety / support / familiarity of Seashells) – 14%
  - Users with a disability / mums with pushchairs (access concerns) – 10%
  - Users with Special Educational Needs (SEN) needs / the neurodivergent – 8%
- 9% of consultees answering request consideration of accessibility re parking, lack of parking at Gateway.
- 9% of consultees answering requested consideration of safeguarding concerns / perceptions of the Gateway not being safe for children due to building location / use by others.

**Please tell us your views on our equality analysis and/or if you think there is anything we should consider relating to equality and diversity for the Seashells Family Hub proposal?**

Base: all answering (301)

	Number of consultees answering	% of consultees answering
Comments / reasons for not closing Seashells / Seashells should not be closed / it's vital	105	35%
Comments / reasons for not using Gateway / Gateway should not be used	70	23%
Seashells is inclusive / equality is all they know / everyone is welcome	60	20%

	Number of consultees answering	% of consultees answering
Seashells serves some of the most vulnerable and deprived residents / areas / plans discriminate against those people / people living in Sheerness	43	14%
Consider the children / the impact on their lives and their futures without the safety, support, familiarity, importance of Seashells	41	14%
Consider accessibility for users with a disability / mums with pushchairs	31	10%
Consider accessibility re parking, lack of parking at Gateway	26	9%
Consider safeguarding - Gateway is not safe for children – location / building nor from other users	26	9%
Discriminates against those who are losing access to services, e.g. especially mums and babies	25	8%
Consider those with SEN needs, the neurodivergent, discriminates against those if no longer able to access services	24	8%
You should consider the desperate situations of those who use Seashells / the impact on them if Seashells was to close	24	8%
Consider those who cannot use or pay for transport (public or private)	17	6%
Consider those with mental health issues	16	5%
Not representative of the area, needs to be a local / community assessment	16	5%
Looks fine, covered everything	12	4%
No need to label or categorise people, take everyone for who they are	6	2%
Discriminates against those not on benefits, who also rely on these services	3	1%
Don't understand the question	12	4%

Some example verbatims underpinning perceptions of Seashells Family Hub being inclusive / focused on equality / the proposed move discriminates against vulnerable and deprived residents / users can be found below:

**“Seashells show equality in every service or group they do , showing anyone is welcome to come and join a group or seek help if they need too .”**

**“Seashells welcomes the whole community. They welcome everyone and make suitable adaptations where needed. People who use Seashells do not feel judged and are treated with kindness and respect. Sheppey Gateway, however, is not like this. When I have been there with my autistic child who sometimes makes sounds, they ask me to manage his behaviour or leave. The Gateway is not inclusive for someone with anxiety or autism how can you expect them to walk through a busy high street to access Seashells? How can people with physical disabilities access the centre? Where will they park? How is it safe?”**

**The doors to the Gateway are always open? Anyone can walk in. How will you address child safeguarding? How will you stop photos being taken? Children watched?."**

**"Seashells has always offered services to support equality and diversity. In particular, the staff are supportive of neurodivergent families and their specific needs."**

Some example verbatims underpinning consideration for specific demographic groups (children, users with a disability / mums with pushchairs / users with SEN needs / the neurodivergent) can be found below:

**"The Isle of Sheppey is greatly lacking in services such as Seashells. Without this centre, there is nothing for the catchment age group to do in a structured setting with peers until they reach nursery age. Thus, depriving these children of much needed development skills such as interacting with peers and fine motor skills. These hubs allow new parents to the area to get to know what is available and to meet people. Without these centres those less fortunate could easily become forgotten about. They provide a wealth of information and support for parents of all ages and backgrounds."**

**"Those of working and lower class who are struggling to access employment or manage the cost of living should have centres available to them where support on raising children can be found; it is a huge concern that the poorest and most vulnerable in our society have the hardest time in seeking support and being able to achieve a good quality of life."**

**"I had surgery from pregnancy. I need to park close to centre. Gateway has no parking. I have little money to pay for parking. My children like to play outside. Where can they do this at the Gateway? My child will have limited learning. Limited play with other children. My child are not the same as other children."**



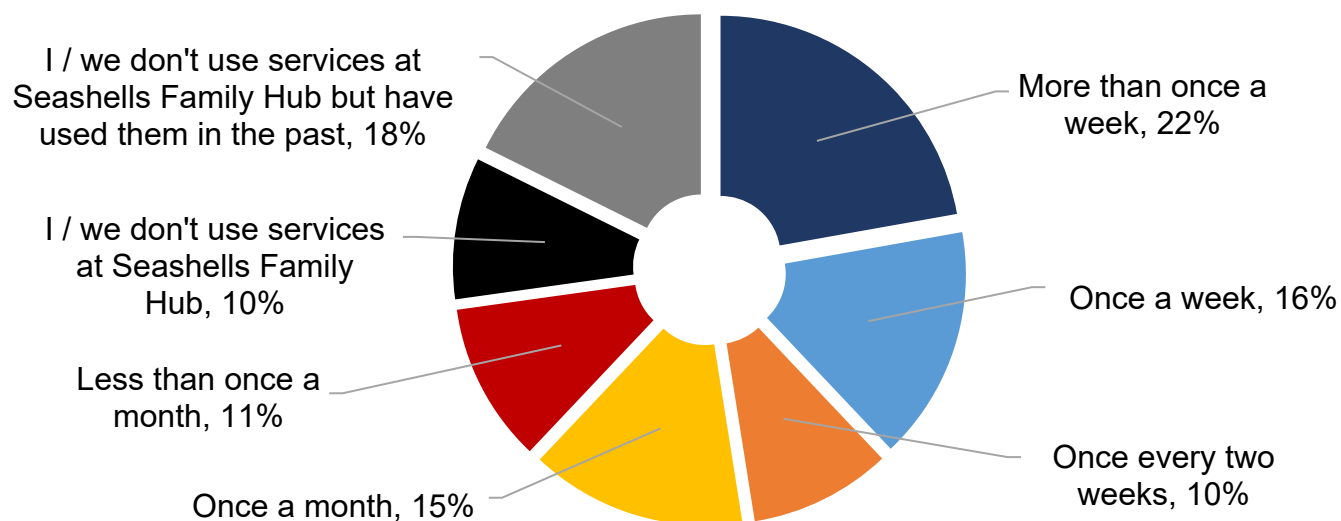
# RESIDENT FEEDBACK

## MILLMEAD FAMILY HUB

This section of the report summarises response to the questions posed surrounding the Millmead Family Hub in the consultation, as reported by consultees. 433 consultees chose to answer questions regarding this Hub.

### FREQUENCY OF USING MILLMEAD FAMILY HUB

- Just under three quarters of consultees answering (73%) indicated they use services at Millmead Family Hub. 38% use services there at least once a week (22% more than once a week, 16% once a week).
- Just under one in five consultees answering (18%) do not currently services at Millmead Family Hub but have done so in the past. 10% of consultees answering have not used services at the Hub.



SUPPORTING DATA TABLE	Number of consultees answering	% of consultees answering
Net: Use Millmead currently (any frequency)	305	73%
More than once a week	93	22%
Once a week	66	16%
Once every two weeks	40	10%
Once a month	61	15%
Less than once a month	45	11%
I / we don't use services at Millmead Family Hub	40	10%
I / we don't use services at Millmead Family Hub but have used them in the past	74	18%

There are significant differences in the proportion who currently use services at the Millmead Family Hub by age group: a higher proportion of consultees aged 25-34 and 35-49 currently use services at the Hub (90% and 69%) compared to consultees aged 50 & over (48%).

## PERCEIVED IMPACT OF ACCESSING FAMILY HUB SERVICES AT A DIFFERENT FAMILY HUB, E.G. MARGATE (SIX BELLS), CLIFTONVILLE OR NORTHDOWN ROAD

- Consultees were asked to detail the impact they think accessing Family Hub services at a different Family Hub (e.g. Margate (Six Bells), Cliftonville or Northdown Road) would have on themselves and / or their family, in their own words.
- For the purpose of reporting, we have reviewed respondents' comments and have grouped common responses together into themes. These are reported in the table below.
- 87% of consultees who chose to answer questions about the Millmead Family Hub provided a comment at this question.
- The most common theme noted is that the Millmead Family Hub is local / accessible / mums with pushchairs can walk there / mums postpartum can access and that many wouldn't be able to go elsewhere / unable to afford the bus / alternatives are uphill / inaccessible to mums on foot (53%).
- 37% of consultees commenting believe that Millmead Family Hub must not be closed / it's a much-needed resource / relied upon by many families / offering lots to local families and believing closure would be devastating.
- Just under a quarter of consultees (22%) commented they believe lots of deprived children attend Millmead Family Hub / it is invaluable for their development / enjoyment / wellbeing / socialising skills. In addition, 10% commented that the current Hub is in an area recognised for deprivation levels and that removing Millmead could push these families further into deprivation.
- 16% of consultees commented that the staff at Millmead Family Hub are welcoming / supportive / they trust them and they / their children have developed close relationships with them. 13% also commented that Millmead is a safe, warm, secure, comforting, familiar, welcoming environment.
- 12% also commented that Millmead Family Hub has a free accessible car park, and the alternatives do / may not.

**Please tell us what impact you think accessing services at a different Family Hub, like Margate (Six Bells), Cliftonville or Northdown Road, would have on you and / or your family? Base: all answering (376)**

	Number of consultees answering	% of consultees answering
Millmead is local / accessible / many wouldn't be able to go elsewhere / unable to even afford the bus fare / mums with pushchairs can walk there / mums postpartum can access / others are uphill and inaccessible to mums on foot	201	53%
Millmead must not be closed: is much needed resource, relied upon by many families, offering lots to local often deprived families, closing it would be devastating, save money elsewhere	140	37%

	Number of consultees answering	% of consultees answering
Lots of deprived children attend Millmead: is invaluable for their development, enjoyment, well-being, socialising, soft play, nursery, Sure Start	84	22%
The staff at Millmead are welcoming / supportive / we trust them and we and the children have developed close relationships with them	62	16%
Millmead is a safe / warm / secure / comforting / familiar / welcoming environment	50	13%
Millmead has a free accessible car park / others do / may not	46	12%
Recognised area of deprivation / removing Millmead could push these families further into deprivation	37	10%
There are lots of clinics attended / health visitor / baby weigh / healthy child clinic	36	10%
Millmead is relied upon by new mums, provides postpartum support, breastfeeding support, used by lots of mums / parents with babies	35	9%
Many families would no longer be able to attend, use services if Millmead closed	34	9%
Others will not be able to offer the same level of service, it's not big enough, will not be able to house all the services on offer at others	29	8%
Clubs, events, activities are free, couldn't afford to pay for such like, we attend lots of activities we wouldn't be able to otherwise	28	7%
Change not good for those with anxiety - places, people, surroundings, means they would not be able to attend elsewhere	24	6%
Other hubs would be stretched	21	6%
Millmead has baby sensory rooms / classes	18	5%
Millmead provides a social aspect / making friends / prevents social isolation	17	5%
We / lots use Millmead regularly, have done for years	15	4%
Millmead is accessible for the disabled, all on one level	15	4%
Others are not family friendly , not set up for families and children	14	4%
Millmead is a lifeline for many families	13	3%
Millmead provides lots of information and advice, signposting	10	3%

Some example verbatims underpinning comments regarding the Millmead Family Hub being local / accessible on foot (including for mums with pushchairs / mums postpartum) and that many wouldn't be able to go alternatives can be found below:

**“I believe that any cut to the service would be detrimental. The fact that these other hubs are around 1.5 miles further away for these families will inevitably make it more difficult for**

them to travel. As an area of high deprivation, they may not have access to their own vehicle or the funds for public transport. Therefore, making it more difficult to access the services available.”

“Millmead Children’s Centre serves a deprived local area where many parents don’t drive, accessing a family hub further from town will reduce the chance of a visit for many parents in the area and adversely affect the development and wellbeing of children in the area.”

“Accessing different family hub services would ruin the sense of community and trust that we have built up here at Millmead. We are confident and safe here and would not use an alternative hub due to lack of community and distance to travel.”

Some example verbatims underpinning comments about not wanting Millmead Family Hub to close / perceptions it’s a much-needed resource and staff at are welcoming / supportive can be found below:

“The closure of Millmead Family Hub would have a profound and negative impact on my family and the wider community. Millmead is located in the Dane Valley area of Margate, which is one of the most deprived wards in Kent. The centre serves as a critical resource for over 62 families who rely on its services for necessities such as midwifery, child development support, and social services. For my family, Millmead has been more than just a place for services—it has been our lifeline during some of our most challenging times. The loss of Millmead would mean that many vulnerable families would lose access to essential services, potentially leading to an increase in social isolation and a deterioration in child and family health outcomes. The staff at Millmead have built strong, trusting relationships with local families, providing personalized support that would be difficult to replicate at other hubs. Moving these services would not only disrupt these critical relationships but also potentially lead to a decrease in service usage, as the new locations are not as accessible or familiar to the community. The unique role that Millmead plays in the lives of local families cannot be overstated—its closure would be a significant blow to the community’s well-being.”

“I have built a good relationship with staff and feel welcome and safe, my child whom is 2 years recognises the building ,staff and lay out and feels comfortable, the services are so helpful for my son because he doesn’t talk yet so it’s helpful for him to have interaction with other children his own age in a safe and welcoming environment. I also enjoy socialising with other parents and talking to staff there.”

“Millmead is the best family hub in the area. It is closest to my house. And easy to reach on foot. As a single parent the support and help I’ve received from Millmead has been invaluable. And I would be gutted for myself and the wider community if it went. Frankly it is way better than the other centres, in the services it offers but also the building and facilities. Its spacious, clean and the staff are incredible.”

Some example verbatims underpinning comments regarding the impact on deprived children who use the Hub / the concern for further deprivation can be found below:

“I think that having a community space that is central to your neighbourhood can only benefit all that live there. Millmead is home to some of the poorest people in Thanet and as

**such they continue to be affected by the long-term effects of poverty and its issues that are passed down generations. With the closure of Quarterdeck, there is an astounding lack of provision for youth on the Isle. This will only mean a rise in antisocial behaviour and crime on the estate. Those with limited mobility might struggle in accessing the services at other hubs should this centre shut down. Not to mention, the fostering of a community within Millmead will just disappear. Will these services still be as effective absorbing all these people from the Millmead Centre?"**

**"The Millmead Centre now stands as an important community hub that helps many poor and deprived households connect with services that can help them. If you remove the services from this hub, I strongly doubt any significant number would reengage with other outposts. Furthermore, you are proposing to move services 1.5 miles to Cliftonville which, if anything, is more deprived and needy. As a result, Cliftonville has something of a reputation as somewhere not to go. Even assuming that the Millmead residents do in part take advantage of the Cliftonville hubs, you run the risk of overburdening those hubs by forcing them to service two areas of notable poverty and need. In practice, I believe that what you will find is that the removal of a community lifeline from Millmead would only serve to reinstate the disenfranchisement the Millmead team has worked so hard to undo. I am fully confident that most families will see this as taking away services from them. I am equally confident that very few if any will engage with hubs that can be more than half an hour away depending on bus reliability and traffic conditions. I believe that these changes could save KCC a significant amount of money but at the cost of ceasing to serve a vulnerable and isolated community. There is a very real human cost component to this recommendation that is not reflected in the consultation report."**

**"Dane Valley itself is one of the most deprived areas in Kent, this centre is a lifeline for many families. To remove these services is an entirely false economy. From a capital perspective, the centre is only 20 years old and provides excellent facilities. In the longer term - the true cost of closure will almost certainly come back to haunt KCC via increased pressures on the NHS, Social Care and our schools. Early years support for families is vital to our economy and has proven positive impact on family functioning and emotional development of our young people. It has also been found that in areas supported by SureStart, there were significant reductions in the number of hospital admissions for children 0-15 years old. Withdrawing services to Millmead will not only be an act of cruelty - severing a lifeline for communities who need it most but will be an act of economic incompetence that must be fought at every step."**

## **Response filtered by current users of services at Millmead Family Hub only**

- When filtering response to the key themes by consultees who indicated they currently use services at the Millmead Family Hub, response is broadly consistent across all themes.

**Please tell us what impact you think accessing services at a different Family Hub, like Margate (Six Bells), Cliftonville or Northdown Road, would have on you and / or your family? Base: all answering (278)**

	Number of consultees answering	% of consultees answering
Millmead is local / accessible / many wouldn't be able to go elsewhere / unable to even afford the bus fare / mums with pushchairs can walk there / mums postpartum can access / others are uphill and inaccessible to mums on foot	147	53%
Millmead must not be closed: is much needed resource, relied upon by many families, offering lots to local often deprived families, closing it would be devastating, save money elsewhere	93	33%
Lots of deprived children attend Millmead: is invaluable for their development, enjoyment, well-being, socialising, soft play, nursery, Sure Start	61	22%
The staff at Millmead are welcoming / supportive / we trust them and we and the children have developed close relationships with them	46	17%
Millmead is a safe / warm / secure / comforting / familiar / welcoming environment	40	14%
Millmead has a free accessible car park / others do / may not	38	14%
Recognised area of deprivation / removing Millmead could push these families further into deprivation	22	8%
There are lots of clinics attended / health visitor / baby weigh / healthy child clinic	30	11%
Millmead is relied upon by new mums, provides postpartum support, breastfeeding support, used by lots of mums / parents with babies	27	10%
Many families would no longer be able to attend, use services if Millmead closed	28	10%
Others will not be able to offer the same level of service, it's not big enough, will not be able to house all the services on offer at others	23	8%
Clubs, events, activities are free, couldn't afford to pay for such like, we attend lots of activities we wouldn't be able to otherwise	24	9%
Change not good for those with anxiety - places, people, surroundings, means they would not be able to attend elsewhere	21	8%
Other hubs would be stretched	19	7%
Millmead has baby sensory rooms / classes	18	6%
Millmead provides a social aspect / making friends / prevents social isolation	16	6%

	Number of consultees answering	% of consultees answering
We / lots use Millmead regularly, have done for years	13	5%
Millmead is accessible for the disabled, all on one level	9	3%
Others are not family friendly , not set up for families and children	13	5%
Millmead is a lifeline for many families	9	6%
Millmead provides lots of information and advice, signposting	8	3%

### **Differences in response by resident demographic**

- Further to likely usage patterns, there are some significant differences in impact perceptions by resident demographic:
  - A higher proportion of consultees aged 35-49 comment that the Millmead Family Hub is local / accessible / mums with pushchairs can walk there / mums postpartum can access and that many wouldn't be able to go elsewhere / unable to afford the bus / alternatives are uphill / inaccessible to mums on foot (63%).
  - A higher proportion of consultees aged 50 and over comment that Millmead Family Hub must not be closed / it's a much-needed resource / relied upon by many families / offering lots to local families and believing closure would be devastating (49%).
  - A higher proportion of consultees with children 2-5 years old and 6-10 years old comment that the Millmead Family Hub is local / accessible / mums with pushchairs can walk there / mums postpartum can access and that many wouldn't be able to go elsewhere / unable to afford the bus / alternatives are uphill / inaccessible to mums on foot (64% / 64%).

## EQUALITY ANALYSIS FOR MILLMEAD FAMILY HUB PROPOSAL

- Consultees were asked to comment on the Equality Analysis put forward for the Millmead Family Hub proposal and if there was anything that should be considered relating to equality and diversity in their own words.
- For the purpose of reporting, we have reviewed respondents' comments and have grouped common responses together into themes. These are reported in the table below.
- 39% of consultees who chose to answer questions about the Millmead Family Hub provided a comment at this question.
- A significant proportion of comments noted at this question reiterate points / reasons consultees believe the Millmead Family Hub should not close (36% of consultees commenting).
- 16% of consultees made reference to perceptions of Millmead Family Hub being inclusive / focused on equality and is an environment where everyone is welcome. 24% commented that the Millmead Family Hub serves some of the most vulnerable and deprived residents / areas and that the proposed move discriminates against these demographic groups / people living in Thanet.
- 20% of consultees answering request consideration of those who cannot use or pay for transport.
- Comments include requests for consideration of specific demographic groups:
  - Children (without the safety / support / familiarity of Millmead) – 17%
  - Users with a disability / mums with pushchairs (access concerns) – 16%

**We have completed an initial Equality Impact Assessment (EqIA) on the proposal for the Millmead Family Hub. Please tell us your views on our equality analysis and/or if you think there is anything we should consider relating to relating to equality and diversity for this proposal?** Base: all answering (167)

	Number of consultees answering	% of consultees answering
Comments / reasons for not closing Millmead / Millmead should not be closed / it's vital	60	36%
Millmead serves some of the most vulnerable and deprived / proposed move discriminates against those people / the people of Thanet	40	24%
Consider those who cannot use or pay for transport	34	20%
Consider the children / the impact on their lives and their futures without the safety, support, familiarity of Millmead	28	17%
Millmead is inclusive / equality is all they know, everyone is welcome	27	16%



	Number of consultees answering	% of consultees answering
Consider accessibility for disabled, mums with pushchairs - Millmead is very accessible	26	16%
You should consider the desperate situations of those who use Millmead, the impact on them if Millmead was to close	21	13%
Discriminates against those who are losing access to services, e.g. mums and babies	15	9%
Looks fine / covered everything	10	6%
Not representative of the area / needs to be a local / community assessment	9	5%
No need to label or categorise people, take everyone for who they are	6	4%
Consider those with SEN needs, the neurodivergent, discriminates against those if no longer able to access services	6	4%
Comments / reasons for not using others	5	3%
Consider accessibility re parking, lack of parking at others	3	2%
Consider those with mental health issues	2	1%
Consider safeguarding - others are not safe for children – location / building nor from other users	2	1%

Some example verbatims underpinning perceptions of Millmead Family Hub being inclusive / focused on equality / the proposed move discriminates against vulnerable and deprived residents / users can be found below:

**“The centre serves a range of families and individuals in one of the most deprived areas of Margate, they have an amazing approach when it comes to inclusion and accessibility.”**

**“Millmead Hub covers a deprived area and the poorest and most vulnerable people will be really affected by losing these services.”**

**“The Millmead Family Hub serves a specific community and is well-attended by low-income parents. Closing this will create further inequality as those parents may struggle to cope with the added travel demands. Also putting pressure on the other hubs will lead to parents + children being excluded from activities / opportunities.”**

Some example verbatims underpinning perceptions of Millmead Family Hub being inclusive / focused on equality / the proposed move discriminates against vulnerable and deprived residents / users can be found below:

**“Please consider the access for those who cannot walk long distances and for those with communities that would mean getting to another service would be an impossible mission.”**

**“Some people may struggle to get to other centres. Millmead is a very deprived area and lots of people rely on it especially for the food bank and social aspects.”**

**“Very poor and does not understand the problems of residents using this facility. It may be fine for people in West Kent to get in their cars to access these services but would not work for the majority of families in need in Millmead.”**

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## RESIDENT FEEDBACK

### ANY OTHER PROPOSAL COMMENTS OR SUGGESTIONS

- Consultees were asked to make any other comments or suggestions for the proposals put forward in their own words.
- For the purpose of reporting, we have reviewed respondents' comments and have grouped common responses together into themes. These are reported in the table below.
- 65% of consultees taking part in the consultation provided a comment at this question.
- The most common theme noted at this question reiterates points / reasons consultees believe the current Hubs are a much-needed resource as they are / relied upon by many / offering a lot to local families and that closing them would have a significant impact (70% of consultees commenting).
- Deprivation is also top of mind with 24% of consultees commenting that lots of deprived children attend the current Hubs and that they are invaluable in their development. 14% of consultees answering comment on the plans being made in areas of deprivation / removing the Hubs could push families further into deprivation.
- 14% of consultees answering comment on the Hubs being accessible and many not being able to go elsewhere / to alternatives due to personal circumstances (financial, practical and personal reasons).

**Please tell us if you have any other comments or suggestions about the proposals in this consultation.** Base: all answering (657)

	Number of consultees answering	% of consultees answering
The Hub(s) is/are a much-needed resource(s) / relied upon by many families / offering lots to local often deprived families / makes no sense to close it/them / save money elsewhere / closure would be devastating / already had others closed	458	70%
Lots of deprived children attend the Hub(s) / invaluable for their development / enjoyment / wellbeing / socialising	159	24%
The staff at the Hub(s) are welcoming, supportive / we trust them and we and the children have developed close relationships with them	106	16%
The Hub(s) is/are local / accessible / many wouldn't be able to go elsewhere / unable to afford bus fare / mums with pushchairs can walk there / mums postpartum can access / others are uphill and inaccessible to mums on foot	93	14%
Comments on plans made in areas of deprivation / removing the Hub(s) could push these families further into deprivation / make them even more vulnerable	89	14%

	Number of consultees answering	% of consultees answering
Others will not be able to offer the same level of service / it's not big enough, will not be able to house all the services on offer at others, no privacy, would be stretched	83	13%
The Hub(s) is/are relied upon by new mums / provides postpartum support / breastfeeding support / used by lots of mums / parents with babies	74	11%
The Hub(s) provide(s) a social aspect / making friends / prevent social isolation	68	10%
The Hub(s) is/are a safe / warm / secure / comforting / welcoming / familiar environment	65	10%
Many families would no longer be able to attend / use services	61	9%
The Hub(s) is/are a lifeline for many families	57	9%
Clubs, events, activities are free, couldn't afford to pay for such like	51	8%
The services the Hub(s) provide(s) is/are good for my mental health / has mental health drop in sessions	47	7%
Lots of clinics attended / health visitor / baby weigh / healthy child clinic	43	7%
Alternatives to Seashells are not family friendly / not set up for families and children / other users / unsuitable hours / wrong location / unwelcoming / no pushchair parking	42	6%
The Hub(s) provide(s) lots of information and advice, signposting	32	5%
There would be an increase in family services referrals, disengagement, social problems (Surestart was invaluable in helping to prevent this), cost more down the line	31	5%

Some example verbatims underpinning comments regarding the Hub(s) being much-needed resources / relied upon by many families can be found below:

**“Millmead family hub has helped me beyond belief. The outreach has gotten me through mental health crisis’. They improved my sons social and emotional wellbeing. I have gained more confidence in the services they have provided. Their food bank has kept me fed at times when I have had no food. They are detrimental to the community.”**

**“Millmead is a highly deprived area, most living in borderline or absolute poverty. Young families and especially teenage mothers need this service to survive! Those without a vehicle need the centre for midwife visits, help and support. The nursery...the food pantry...food bank and baby clubs are vital to such a deprived area of Margate. Closing this centre will result in major issues in the local community, mainly child poverty.”**

**“Keep Seashells open! There is a need for Seashells and what is offered at Sheppey Gateway is only a fraction of what Seashells offer. Sheppey Gateway have no facilities for SEN children or anything to offer families during the six-week holiday like Seashells offer,**

**After School Clubs will be lost for working parents and it will be harder to get any appointments to see the health visitor, finances, etc. There is too much to lose if Seashells is closed as a family hub just to save some money. It's clear Sheppey Gateway is a bad decision."**

**"Seashells has been a trusted and integral part of the local community for the past 20 years, offering services in a safe and supportive environment for families. It provides a warm, welcoming atmosphere where families are greeted with a friendly reception and their needs are promptly addressed by knowledgeable, well-trained staff. Over time, Seashells has built a strong reputation and deep trust within the community, with word-of-mouth playing a vital role in bringing new families to its services. Ending the Seashells funding will hugely impact the good work that can be done for the very vulnerable local community that it serves. By proposing to stop the funding and move just a handful to the Sheppey Gateway will result in an inferior service and in the longer term increasing the demand for other services down the line."**

Some example verbatims underpinning comments regarding the impact on deprived children who use the Hub(s) / the concern for further deprivation can be found below:

**"Families need these centres to socialise their babies and toddlers. For a lot of mums these classes will be their only opportunity. It's very important for a deprived community as also a chance for parents to see and learn how to care for their babies from others."**

**"Seashells is the hub of an already deprived community. It provides a place for many parents/families to come to daily. Staff are friendly, knowledgeable and welcoming."**

**"Closing Millmead will be a disaster for everyone. The little centres won't be able to cope with the sheer amount of people who use Millmead. Millmead is a deprived area and there for the hub is a massive help to lots of family's taking it away will leave the youth without a place to go and the babies and parents will have to travel to get the baby's weighed and seen so likelihood is they won't get seen as not many people can afford to drive."**

Some example verbatims underpinning comments regarding accessing the Hubs / not being able to access on foot can be found below:

**"Being a parent and Carer who has always made use of sure start Millmead, I feel the centre would be a HUGE loss to the residents, who would be unlikely to travel to the other venues. Depriving children & families of vital support that's been available for over 20 years."**

**"Sheerness and the Isle of Sheppey is predominantly a poor and deprived area. Removing essential family and children services hub from our area will have such a negative effect on so many young families that aren't able to travel to access advice and support."**

**"Seashells is used by people from all over the Island. It is accessible from all areas either by car, train, bus, or walking. Its opening hours and the facilities suit most people. Sheppey Gateway will not be able to offer this."**

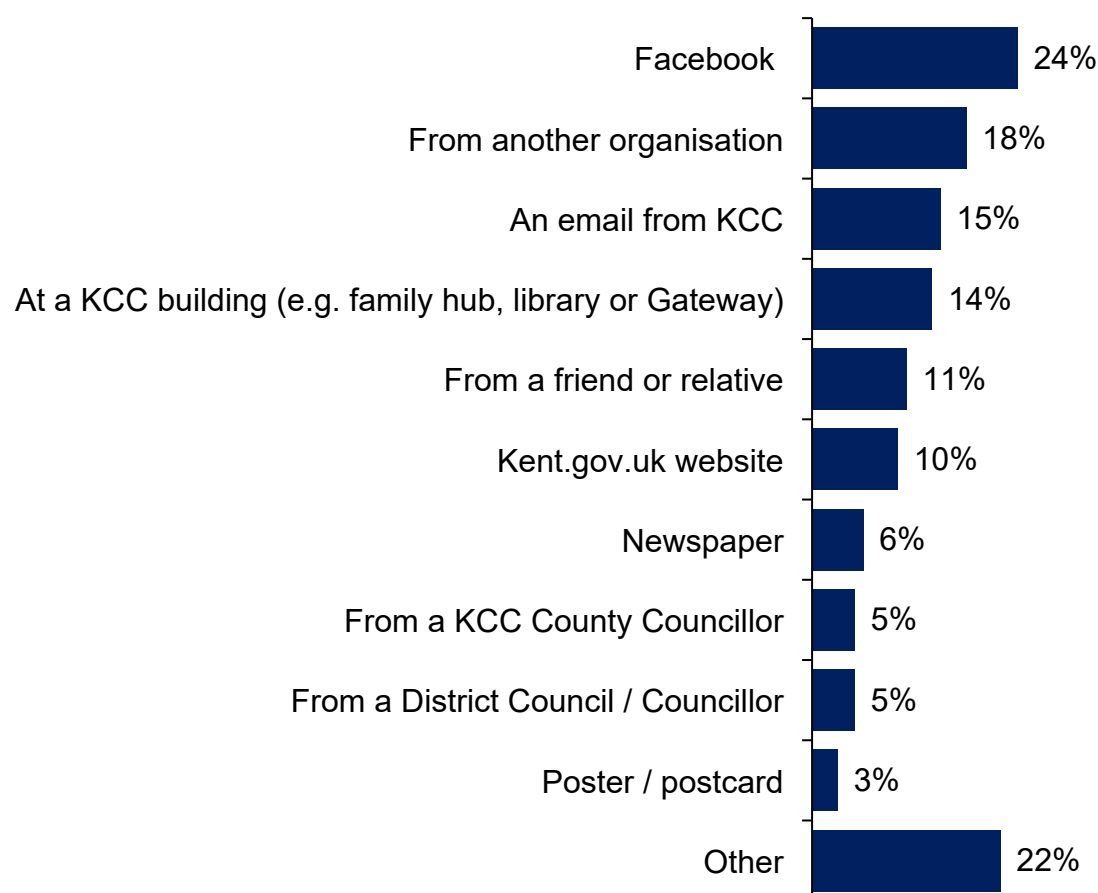
## PROFESSIONALS / ORGANISATION FEEDBACK

### CONSULTATION AWARENESS

- The most common routes to finding out about the consultation are via Facebook (24%), from another organisation (18%) and an email from KCC (15%).
- 14% found out at a KCC building (e.g. family hub, library or Gateway).

#### How did you find out about this consultation?

Base: all answering (95), consultees had the option to select more than one response.



SUPPORTING DATA	Number of consultees answering	% of consultees answering
Facebook	23	24%
From another organisation	17	18%
An email from KCC	14	15%
At a KCC building (e.g. family hub, library or Gateway)	13	14%
From a friend or relative	10	11%
Kent.gov.uk website	9	10%

<b>SUPPORTING DATA</b>	<b>Number of consultees answering</b>	<b>% of consultees answering</b>
Newspaper	6	6%
From a KCC County Councillor	5	5%
From a District Council / Councillor	5	5%
Poster / postcard	3	3%
Other	21	22%

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This section of the report summarises response to the questions posed surrounding the Seashells Family Hub in Sheerness, Swale, as reported by consultees. 67 consultees chose to answer questions regarding this Hub.

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#### PERCEIVED IMPACT OF ACCESSING FAMILY HUB SERVICES AT THE SHEPPEY GATEWAY ON CHILDREN, YOUNG PEOPLE AND FAMILIES

Consultees were asked to indicate what impact they think accessing Family Hub services at the Sheppey Gateway would have on children, young people and families. All 67 consultees provided a comment. Example verbatim comments are shown below and highlight the key themes expressed:

Concern about leaving a well-established place / environment that is well used and trusted by local community, which is particularly important in an area of deprivation:

**“I am very concerned that asking families to leave a known and trusted centre is a retrograde step for an organisation that wants to build positive relationships with their communities. Families in this area are often extremely difficult to engage, taking this provision away will negatively impact this.”**

**“Engaging families in Swale is difficult enough. For a lot of families, it has taken professionals years to encourage engagement; building trust, familiarity etc. They are hard to reach families. The position of Seashells is informal and out of the way. There's an element of discretion and all these little things gives professionals a chance to build the trust and increase engagement.”**

**“Seashells is a very well valued, trusted service on Sheppey. Sheppey Gateway does not appear to have the same trust. The Isle of Sheppey is quite unique in Kent, the Islanders are in an area of high deprivation, lifespan is less than on mainland Kent. Seashells is a trusted provision, giving a good start to young people and their families. Not all listed services at Seashells are on the list for Sheppey Gateway. Residents will not be able to easily travel off the Island to access these services - cost, lack of public transport eg buses, congestion on the roads.”**

**“Though the Sheppey Gateway is a five-minute walk from Seashells, the move of the services only fuels the historic distrust that the most vulnerable communities have of statutory services. Seashells has been providing services for families and have built up a significant reputation and trusted relationships for families and people who have high and complex needs. Removing the services from this location demonstrates a failure of the system once more to provide consistency for this community, and the risk of adverse effects across Health and Care should be carefully considered and suitable mitigations in place.”**

Concern services and available parking offered at Sheppey Gateway would be more limited than at Seashells Family Hub / valued services would reduce:



**“After reading how the services will compare to what is available to young families now and what will be available. I feel that there will be a massive gap to support our young babies and their parents. Sheerness is in one of the most deprived areas and we need to have support and services in place to help these young babies' and their carers to help break this cycle. Stopping services such as Singing and signing will massively impact the already very low speech, language and communication skills of toddlers when starting nursery/preschool. Taking away support with Antenatal care, Breastfeeding and support with parenting will also have a huge impact on how our families begin their role as parents. These services need to stay be it at Seashells or moved to the Gateway.”**

**“The Sheppey Gateway is fine as it is but will never have the time or facilities that Seashells offers to local residents . There is so much more to Seashells than just a few groups and so many people use this amazing place each and every day.”**

**“The reduced hours, and number of services would be detrimental to all users. If a service disappears it will be very difficult to get users back. Those with special needs require an in iron meant that is familiar and consistent. This area and its residents constantly feel like they are second best and loosing services they will feel let down and under-valued.”**

**“This would have an impact on the numbers of families that attend groups and activities because the gateway is not as accessible as Seashells. Families will have to pay for parking because there is limited parking down the high street and for a limited time. The environment within the gateway is different and you have a different variety of customers, whereas in Seashells the environment is set for children and families and has a welcoming atmosphere.”**

Concern about appropriateness of Sheppey Gateway in terms of safety / comfort for its users, location and sharing the building with other organisations / services:

**“Seashells is a purpose-built building to provide a huge variety of services that are needed for the local community in a very bright and friendly welcoming environment, the gateway is a cold dark building that is mainly a vast open space inside and it opens directly onto the high street. I do not feel it's a safe environment for children or vulnerable adults it's also a few doors away from a pub that's open very early in the morning.”**

**“Car Parks around the Sheppey Gateway cost £1.40 per hour. We are in a deprived area and under a cost of living crisis, families will not be able to afford to pay to park in order to access the Gateway. There are no child/family parking spaces in the car parks around the Sheppey Gateway. Child safety concerns there is no perimeter fencing/gates, the Gateway opens directly onto Sheerness High Street. Mixing of groups within the Gateway, is not consider as a safe environment for children and families. The Gateway is a library and offices, Seashells is a Family Hub. Services should remain under 'one roof'.”**

**“The Sheppey Gateway is a multi-agency building, it can get very busy and users are often angry or confrontational. Also, it isn't always clear from the entrance lobby where services are situated and whether they are staffed. It could be intimidating and off-putting to families, particularly new parents. There doesn't appear to be any clarity as to how the breast pump loan scheme will be operated from the Gateway, there may be issues regarding storage and accessibility due to restricted opening hours.”**

**“The Sheppey Gateway was developed as a building to enable people to access public and voluntary services which has proved to be an asset for the community. However, this building is not a purpose build children’s centre and therefore the suitability of this is limited for children, young people and families to access. The Sheppey Gateway will continue to function as is currently, and there is a risk that if vulnerable families do not feel that the space is fit for purpose and does not provide a safe and confidential space for children, young people and families that people may disengage with the services. The opening times of the Sheppey Gateway are also restricted in comparison to Seashells, which may cause an inequality in access for families who need to use the facilities and services in the times that the Sheppey Gateway is not open.”**

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## **PERCEIVED IMPACT FOR PROPOSAL FOR SEASHELLS FAMILY HUB ON OTHER SERVICES AND ORGANISATIONS**

Consultees were asked to indicate what impact they think the proposal would have on other services and organisations. 65 consultees provided a comment. Example verbatim comments are shown below and highlight the key themes expressed:

Concern for impact on Seashells Family Hub services / other services currently in Seashells Family Hub building resulting in further loss of services and inability for services to work together:

**“I think this has a huge potential to be damaging to other services as this is a huge amount of funding you are proposing to remove from children's services which may force the building to close or push up costs for other users making it no longer a viable option for service provision which will see other services leave effectively ending the provision. there has been so much lost through the family hubs transition already. Ironically this site was used as a pilot for the family hubs model and the successes in this site was rationale for the roll out across Kent. This would surely signal a significant risk to the model adopted by Kent and undermine public trust further.”**

**“Seashells work under the ethos of the previous SureStart programmes, which means they are a true hub of partnerships from health, public health, voluntary and third sector organisations, removal of the funding puts the centre at risk and therefore the ability of these services to work in partnership from the hubs. Seashells also run a nursery, there is a risk this may not be able to continue if the centre has to close due to lack of funding, in an area where the majority of the parents are eligible for the FF2 Early Years funding and with nursery places across Kent diminishing this would be a great loss.”**

**“Other organisations use the hub to support users of the hub, and this would not probably be possible at the Gateway to provide space alongside the family hub which would be a barrier to users of the hub accessing other services for support.”**

**“The proposals do not into account the added value provided by additional services offered at Seashells. This breadth and depth of services, coupled with the staff’s deep knowledge of the local families from a variety of angles, ensures a more holistic approach to meeting community needs. Removing Seashells from the equation threatens to fragment the community-based work and reduce the effectiveness of local service delivery. There is also**

**the risk to the sustainability of Seashells itself, which may put other local services at risk. Although not directly affected by the proposed changes the daily midwifery and health visiting services co-located at Seashells are well established and have been integral to the services provided for local families. The trust and understanding that has been established through regular contact ensure good relationships and information sharing between professionals, which is crucial in improving outcomes. These changes will fragment services, reduce family engagement in service and undermine their effectiveness.”**

**“With the community midwifery venue access difficult in the area the removal of the ability to use Seashells will impact on clinic capacity, access to families who cannot drive and confidence in our service.”**

**“Splitting the current services across two locations could have an impact on both. There is likely to be some loss in users. A single location has the benefit of being able to provide information and support that goes beyond what they already offer. While two locations could provide users with the same information, it's not likely to be as effective. For example, antenatal classes will be at Gateway, but midwifery at Seashells. These go hand in hand, why split it up? A sensory hub is being proposed at Gateway, but one will remain at Seashells.”**

**“The proposal assumes that some services will remain, this is a huge assumption and shows lack of awareness of what is currently being funded by KCC. Following the removal of the core funding Seashells would need to explore other sources of income to replace the loss and would potentially need to charge for the room hire which is currently provided free of charge for social services, family time meetings, health visiting clinics, development reviews and appointments. This could result in a huge unplanned cost to KCC that again would mitigate any savings made by ending the contract. Less service users in the building may mean this is a less desirable location for other service who use the seashells service to meet their service requirements.”**

Concern for impact on residents / service users needing to use other statutory services / health and care services / other services that are already stretched:

**“If Seashells loses its services this will have a detrimental impact on families and children and is likely to result in more families using statutory services which are already stretched. This will result in families being isolated as many see seashells as a lifeline. In reducing services at Seashells this will reduce good outcomes for children. The area is one of the most deprived in Kent and Seashells offers free services for families to use. There is a well-used food bank and Community Pantry with a family finance worker to help families. I think this will result in more poverty for children and poor outcomes, short and long term.”**

**“The proposed changes could see an increase in provisions provided by other partners in health and care. With the times of the Sheppey Gateway being restricted compared to the current provision, if children, young people and families are in need there is potential that they will resort to other statutory provision and therefore increase the demand for these services.”**

**“If the cuts are made, more children will be taken into care, there will be a detrimental impact on mental health, families will go back to drugs and alcohol to cope, early intervention will fail. Lives will be lost, and families torn apart. Many are aware of the**

**dangers of long-term stress, addiction and chaos on your general health. Increase risk in heart disease, cancer, diabetes among others. This will have an impact on the NHS service. This will end up costing the NHS service more money and will add demand to an already stretched service. Some of the families using the Hub services have alcohol/ betting addictions. Accessing the gateway means that they have to pass pubs and betting shops on every occasion. This could mean a relapse is more likely and this will be detrimental to families, causing a ripple effect for any professional involvement.”**

**“Social services would see a huge rise in referrals and have to deal with even higher amounts of caseloads as the preventative work that Seashells does will be gone.”**

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## CONSIDERATIONS FOR EQUALITY ANALYSIS

Consultees were asked to express any views on the equality analysis and/or if you think there is anything KCC should consider relating to equality and diversity for the Seashells Family Hub proposal. 47 consultees provided a comment. Example verbatim comments are shown below and highlight the key themes expressed:

Concerns about the impact on travelling to Sheppey Gateway / physical access to Sheppey Gateway in terms of public transport / users with disabilities:

**“The equality analysis carried out by KCC fails to recognise the impact of children, families and young people choosing not to access the service at all due to the many concerning factors of the Sheerness Gateway. There will be poorer outcomes for an already deprived area which will later result in bigger financial impacts to society. The Sheppey Gateway is only listed as a Community Hub, not a Family Hub therefore the nearest Family Hub will be in Leysdown, 9 miles away from Seashells. The area in which the actual Family Hub will be is incredibly isolated due to poor public transport. The journey is 20 minutes in the car, 3 hours on foot with very few buses travelling to that area. The Community Hub at the Sheppey Gateway will not be delivering a full family hub offer therefore, residents will be forced to also travel to Leysdown for services.”**

**“A lot of people needing accessibility use Seashells services as they can park on the premises or the road outside the high street has three disabled parking bays along the length of the high street therefore not making it accessible for all. My mum is wheelchair bound and sit in the passenger seat of the car, due to the way the parking bays are set in Sheerness high street I am unable to safely get her out of the car and into her wheelchair, we are not the only family to have this issue so I feel it will stop a vast amount of users from using the services due to safety reasons.”**

**“Health inequalities and the inequalities that exist within the wider determinants of health should be considered within the proposal, for example, employment rates, proportion of those who have access to a car/van and fuel poverty. The EqIA does not consider blue badge parking for children, young people and families with disabilities. Though Sheerness high street does have on-street parking for blue badge holders, this is not specifically for those using the Sheppey Gateway and therefore there may be issues with availability. Sheerness High Street is also a road with no restrictions for vehicles, and therefore in times**

**with high traffic volume, there is a safety consideration for families when getting themselves and their children from their vehicles. Consideration will need to be made for the safety of these families.”**

Concerns for proposals impacting users' mental health and comfort / ability to use services at Sheppey Gateway:

**“Residents with poor mental health and disorders will be hugely impacted by the proposed change. In an area where trust and relationships are built through the staff and services that are delivered from Seashells this will be compromised by the change. Families will be distressed; they consider Seashells to be a safe haven that they can access support and guidance when they need. The Sheppey Gateway has reduced opening times, and the Community Workers will not be based there, it's only an outreach venue so those who need help will not be able to access this at certain times of the week. residents with poor mental health and disorders need consistent face to face support, something that the proposal will not be able to offer. Disabled residents will be impacted - there is only one disabled parking bay outside the Sheppey Gateway. and how do those clients with disabilities / wheelchairs / double buggy's access services provided upstairs?”**

**“People suffering with their mental health, anxiety, depression would not feel comfortable and many not able to access the Gateway as its environment is not welcoming and too overwhelming for many.”**

**“Young children with neuro-diversity would have created an attachment to Seashells and will prefer that site over the Gateway. Changing this element of routine for neuro-diverse children could impact their social skills & behavioural education. Additionally, having 2 hubs can create a quieter and more relaxed venue for families to visit.”**

Concerns that proposed plans do not consider the relationship and trust that users have with the Seashells Family Hub / services offered / staff:

**“The assessment does not take into account the unique value of Seashells' long-standing relationship with the community, which ensures vulnerable families access services tailored to their needs. Sheerness and the surrounding area face high levels of deprivation and child poverty. Many of these families are also coping with additional challenges, such as SEND, disabilities, and mental health issues making it essential that services are easily accessible and free from barriers. Changes to the location, staff, or structure of services would place further strain on those who may experience increased distress from having to access services in a new, unfamiliar location with unfamiliar staff. Without careful management, there is a risk that some families may stop accessing these essential services altogether, leading to a worsening of existing conditions and greater long-term consequences for both parents and children. The closure of Seashells Family Hub and the proposed relocation of services to the Sheppey Gateway does not adequately take into account the deep feeling of loss that would be experienced by families in the local community and the significant barriers this change would create for those who rely on these vital services.”**

**“While the Sheppey Gateway has all the amenities the families will need. Young children with neuro-diversity would have created an attachment to Seashells and will prefer that site**

**over the Gateway. Changing this element of routine for neuro-diverse children could impact their social skills & behavioural education. Additionally, having two hubs can create a quieter and more relaxed venue for families to visit.”**

**“The importance of the trust and respect that the dedicated professionals at Seashells have built up over two decades must be acknowledged as a prime reason for the 40,000 people to visit Seashells for support. Moving to the Gateway would immediately reduce the interaction of all those who feel a lack of trust in Council provided services (they feel more formal than Seashells) or feel they would not fit in because of their differences- even though these feelings may only be perceived and not reality.”**

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This section of the report summarises response to the questions posed surrounding the Millmead Family Hub in the consultation, as reported by consultees. 36 consultees chose to answer questions regarding this Hub.

#### PERCEIVED IMPACT OF ACCESSING FAMILY HUB SERVICES AT A DIFFERENT FAMILY HUB ON CHILDREN, YOUNG PEOPLE AND FAMILIES

Consultees were asked to indicate what impact they think accessing services at a different Family Hub, like Margate (Six Bells), Cliftonville or Northdown Road, would have on children, young people and families. All 36 consultees provided a comment. Example verbatim comments are shown below and highlight the key themes expressed:

Concern about leaving a well-established place / environment that is well used and trusted by local community, which is particularly important in an area of deprivation:

**“Millmead Children’s Centre has been there for 20 years supporting families, families are familiar with staff and feel comfortable attending, sending families elsewhere would be detrimental to these families engagement.”**

**“A lot of the families who use Millmead suffer a variety of social and wellbeing problems such as anxiety. They have made bonds with the MCCPL staff over years and taking these services away from them will have a hugely detrimental effect on their wellbeing and ability to function in society. They have come to know and trust our staff and for some of the families they rely on our staff to help them with day-to-day problems that they wouldn't feel comfortable asking a new person to help with.”**

**“Millmead is in the centre of a large estate in an area of high deprivation. Communities stick to what they know, and trust and much time will have been spent by staff building relationships with the local community and gaining their trust. If Millmead loses funding and is unable to deliver their current services, families are unlikely to go to the other Family Hubs where they don't know the staff, the hubs or the services, meaning families and most importantly children are likely to miss out on much needed support.”**

**“I think that families on Millmead would not generally access services at other Family Hubs as they would lose all confidence in KCC if through their funding cuts to Millmead they would lose their building. KCC has a very low level of confidence with residence on the Millmead estate and this was acknowledged by KCC who led on the development of the Sure Start Millmead programme.”**

**“It was evident that the staff and services that Millmead provides have had a transformational effect upon many individuals and families over many years. The local community that currently utilises Millmead may not feel confident in accessing services at a new location and having to build new relationships and trust.”**

Concern current users / residents local to Millmead Family Hub would not travel to visit other centres / services due to available income / deprivation / having to use public transport to get there:

**“Thanet Millmead is one of the most deprived areas in Thanet. Loss of this service may mean that those people who currently access services will not be able to travel to other children's centres.”**

**“The children, young people and families of Millmead, one of the most deprived neighbourhoods in the whole of Kent, would find it very difficult to travel over a mile to the next nearest Family Hub. Many families do not have access to cars to make this journey, moreover, families would struggle to afford the additional cost of bus travel and even if they could the area is not served well by reliable public transport. That leaves only the option of walking which would be difficult as this is along busy roads and uneven surfaces. Young families would especially struggle making this journey with children and even more so if they have buggies, prams or are affected by disabilities or mobility issues. Furthermore, this journey would be made even more challenging during winter months marked by short days, rain, ice and cold temperatures.”**

**“Families, children and young people do not necessarily have the means to travel to different family hubs. Your narrative with regards to distance is misleading as for a family you are actually expecting them to travel near as a 3-mile round trip. Clearly there is also a disconnection of understanding between the information KCC analytics recently published and the people who have decided to move forward on this consultation. Millmead is rated as a highest area for child poverty and deprivation, it is quite obvious what comes with these statistics- financial difficulty, anxiety, low mood, isolation, low energy due to lack of food- therefore not travelling nearly 3 miles to another hub. Millmead was an original Sure start building for a reason, positioned in a place it was needed to serve those families in most need this has not changed. Perhaps you should be considering to close another one of the KCC Thanet hubs and ensure families who live in the area of highest child poverty and deprivation can continue to access these services within a realistic accessible proximity to where they live.”**

**“A massive impact, this is in a very deprived area and many families would not be able to afford to access the other family hubs by public transport, many do not have cars, and it would not be acceptable to expect them to walk such a distance with babies and young children, especially in the long winter months. The families would therefore not be accessing these vital services that Millmead offer. It offers so much more than those listed in the document, it is a place of safety for many, a place of warmth and a LOCAL community place to seek friendship and support.”**

Concern about impact on local area / already an area that has lost services / is in need of Millmead Family Hub / an area of significant deprivation:

**“There will be absolutely nothing left in Dane Valley. This is a lifeline, and the other centres are just too far away for the families who have nothing.”**

**“I think it would have a huge and negative impact on the number of families accessing essential services for 0-5s, due to the distance and accessibility of other Family Hub buildings. Dane Valley (where Millmead is located) is one of the highest need communities**



in Kent, with one of the highest rates of child poverty and poor early learning outcomes, and this should be reflected in the continued presence of a Family Hub.”

“Vital to understand the level of poverty experienced by many of the families served by the Children’s Centre. The IMD 2019 headline findings for Kent highlights the position of the Dane Valley ward in the league table as one of the most deprived LSOAs in Kent and Nationally. KCC published their Strategic Commissioning Stats bulletin in January 2020, so this provided an accurate and highly relevant backdrop to this Consultation. So, we have so many families in the ward who are below the poverty line, have very limited access to their own transport and are served by a poor public transport system, have young children who need to be accompanied to school at critical times, where family life creates its own pressures, where mental health issues are experienced significantly. Many of the service users place immense reliance on the support of the Millmead Children’s Centre because staff and volunteers are from the Dane Valley ward, understand the challenges of modern day living, are able to access a number of wrap around services and for whom the withdrawal of the such accessible services are bound to create additional pressures and realistically would mean for many service users of the Dane Valley ward they simply would not be able to access the services provided by Hubs at least a mile from their homes.”

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## PERCEIVED IMPACT FOR PROPOSAL FOR MILLMEAD FAMILY HUB ON OTHER SERVICES AND ORGANISATIONS

Consultees were asked to indicate what impact they think the proposal would have on other services and organisations. All 36 consultees provided a comment. Example verbatim comments are shown below and highlight the key themes expressed:

Concern for impact on Millmead Family Hub services / other services currently in Millmead Family Hub building resulting in further loss of services and inability for services to work together:

**“It would have a massive impact on all the services that run from the centre. It will mean more missed appointments because the centres are not accessible to them. Social services workload will double, the outreach team help in supporting the families to prevent social service action and work closely with social services with safeguarding issues. By closing this centre you are putting more children at risk, more vulnerable people at risk!”**

**“Other partner agencies who are based at The Centre include the Health Visiting Service, Midwifery Community Clinic, Adult Speech and Learning service, Antenatal services and Family Nurse Practitioner. Additionally, so many partner organisations locally provide help and support on a year-by-year basis. The outstanding reputation of the Centre is a main reason why these organisations can utilise the facility and more importantly work in a 'wrap around' way to avoid missed appointments and view families holistically. The closure of the Millmead hub would have a highly damaging impact on their services.”**

**“Millmead work under the ethos of the previous SureStart programmes, which means they are a true hub of partnerships form health, public health, voluntary and third sector organisations, removal of the funding puts the centre at risk and therefore the ability of these services to work in partnership from the hubs. Millmead also run a nursery, there is a**

risk this may not be able to continue of the centre has to close due to lack of funding, in an area where the majority of the parents are eligible for the FF2 Early Years funding and with nursery places across Kent diminishing this would be a great loss.”

“The question is would Millmead Family Hub be able to function without the funding from KCC? I think it would probably have to close down. It has been managing on a very low budget with the previous cuts in funding. I think if the building closed it would have huge implications on other services as it is through the Millmead Family Hub that organisation access local residents. Meetings are held at the centre with other organisations and residents will agree to attend. I think we maybe back to 2000 where residents told me 'nobody cares about Millmead'. The Hub is a focal point for the community. The Hub is where community was developed. This was achieved by people meeting up and getting to know each other and understanding that they had a commonality through shared experiences. This would not be possible without the Hub. There is a lack of understanding on the issue in relation to this consultation. The Hub on Millmead is central to the maintaining of community on the estate. KCC would lose all credibility if they closed the Hub. The levels of need would increase especially Domestic Violence and Safeguarding, SEND, teenage pregnancies, unemployment and others. These would cost KCC far more than they would save on a closure scenario.”

Concern for impact on using other statutory services / health and care services / other services already stretched:

“Yes, increased Safeguarding and Social Services cases due to families not accessing support services that they need due to distance. This will reduce the 'savings' outlined in the proposal.”

“Impact on Safeguarding and Child Protection as referrals will have to go through local teams. Unavailability of emergency service for local community. Impact on Thanet District Council and local Social Services, Police and Health. Already deprived area this would make it more difficult.”

“Further strain would be placed on health and care services in the years ahead. It is likely that a significant proportion of current Family Hub service users at the Millmead Children Centre, which is currently accessed by over 1000 children aged 0-5 per year, would no longer be able to benefit from the services provided as they would be unable to undertake the journey to other Family Hubs which are all over a mile away. Many service users would find this journey too challenging so may not engage in the future or do so infrequently. It is anticipated that this would lead to worse health outcomes for children, young people and families in the Millmead area and as a result would put a further strain on health and care services in the years ahead. Risk of an increase in anti-social behaviour. It's expected that the cessation of Family Hub services in Millmead would directly contribute to an increase in anti-social behaviour. Millmead is a very deprived and challenging area and the Children's Centre itself has been vandalised in the past. Therefore, we would expect that a further strain would be placed on police and community safety services in the future should the Family Hub services be removed from Millmead.”

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## CONSIDERATIONS FOR EQUALITY ANALYSIS

Consultees were asked to express any views on the equality analysis and/or if you think there is anything KCC should consider relating to equality and diversity for the Millmead Family Hub proposal. 25 consultees provided a comment. Example verbatim comments are shown below and highlight the dominant theme expressed regarding concerns of access to alternative services / alternative hubs / children's centres amongst vulnerable groups:

**“Where’s the quality and diversity for the people living in severe poverty? Where's the equality and diversity for disabled people and those with young children in prams? They may not be able to afford the bus, or the bus may be too full to take them, or they may not be able to walk long distances or walk at all. Have you looked at the route? Is it pram and wheelchair accessible? I doubt it. I think you need to consider the area Millmead Children Centre is placed, the community it's within. Stop taking away their lifeline.”**

**The EqIA states - "The ability for residents to access the full (age) range of Family Hub services on offer, as opposed to the limited age-range activities at the commissioned centres represents a benefit to service users" is inaccurate as the likelihood is families will access fewer services. The document already states services are underutilised elsewhere; families would access them if they were what they needed in a place they could easily get to.”**

**“Unrealistic and short sighted. Millmead has continued to serve the community for 20+ years to a very high standard. The justification from KCC that families can access services with 1.5 ( 3 miles round trip) is ridiculous. The equality data is unrealistic and out of touch with regards to what it is really like to live in poverty.”**

**“The EqIA notes that the withdrawal of Family Hub services from Millmead will have an impact on age, disability, sex, pregnancy and maternity however the mitigation is centred on the provision of alternative services at Family Hubs located over a mile away. As stated previously, it is not feasible for many families to make this journey due to a lack of access to private transport, money for public transport and lack of safe walkable routes. The effect is especially prevalent for those families with disabilities or mobility issues. The EqIA needs to consider alternative mitigations to ensure that the closure of Millmead Family Hub does not result in worse health, social, physical and educational outcomes for young children in the area.”**

## PROFESSIONALS / ORGANISATION FEEDBACK

### ANY OTHER PROPOSAL COMMENTS OR SUGGESTIONS

Consultees were asked to make any other comments or suggestions for the proposals put forward in their own words. 74 consultees made a comment at this question. The core themes expressed are consistent with feedback observed at Hub specific free text questions. Example verbatim comments are shown below and highlight the key themes expressed:

Concern for the impact closure of the Hubs will have on local communities due to levels of deprivation and trust in local services:

**“We understand that cuts may need to be made due to lack of funding, but closing the Seashells support services will only have a detrimental effect on hundreds of vulnerable adults and children in an already deprived area.”**

**“Millmead has been the centre of the Community for over 20 years and has a massive footfall. Moving more services into Millmead would have had a bigger positive impact on the most poverty-stricken area of Thanet. Families who are already struggling financially will now have to pay for travel to get to services that once would have cost them nothing. You will be adding to the financial strain of families already struggling to meet day to day costs.”**

**“This area is very deprived, and the service users have taken a long time to grow confident in their children’s centre and its workers, this change which obviously saves money will knock that confidence and once again they will feel like they don’t matter.”**

**“Millmead children’s centre was created by the families in Millmead for the families in Millmead. I know decisions are made on outcomes and data, but Millmead is the essence of community spirit, families helping families and this is hard to measure and quantify. I worry that without KCC funding Millmead families will be isolated and unsupported, and this will impact the health, social and emotional well-being of the next generation. As a children’s social worker in Thanet, it is my view that the outreach staff and the centre are key to children’s safety and well-being in this neighbourhood.”**

**“Working within family support for over 20 years, I have grave concerns about the current proposal by Kent County Council to end the funding they provide to Children & Families for Seashells Family hub services in April 2025. I believe, from the early intervention and preventative work I have witnessed, been a part of and evidenced on hundreds of occasions there will be a hugely detrimental effect to children’s educational attainment, wellbeing, and most importantly safety if this funding ends. Thereby resulting in a sharp increase in emergency and crisis situations, putting further strain on the already overstretched local authority funded health, social and public services.”**

Concern for the perceived safety of alternative locations and whether they are suitable for the services that are proposed to move:

**“Trying to cram high quality existing services into much lower quality existing spaces that are not fit for purpose is a poorly thought-out plan that will simply reduce quality of much needed services in an already struggling deprived area.”**

**“Sheppey Gateway will not be a safe space for many families like seashells currently is. Many families reach out to the staff as a lifeline. Security purposes, gateway building is not as secure as Seashells building and that poses higher risks for children.”**

Concern for the perceived safety of alternative locations and whether they are suitable for the services that are proposed to move:

**“Further comments refer to the impact on families who do not own their own transport and where there is a very poor bus service. Removal of the contract and the services Millmead currently delivers will mean immense difficulty for any local family needing to escort their children to more widespread locations especially in winter darkness and poor weather. The combined impact of this proposal will only exacerbate pressures that local families already experience.”**

**“We have serious concerns that many of the most vulnerable families will not feel confident and comfortable accessing new and different facilities, especially given that Millmead and Seashells have been so successful in transforming the lives of vulnerable and diverse families.”**

**“Sheppey Gateway is a cold building and unwelcoming space; Seashells is not and has built a positive reputation in a difficult to engage community.”**

## NEXT STEPS

This consultation report, along with a Cabinet Committee report and the Equality Impact Assessment, is due to be presented to Members of the Children's, Young People and Education Cabinet Committee in November 2024. Following this meeting, a decision will be made on whether or not to implement the proposals. The consultation website will be updated once a decision has been taken: [www.kent.gov.uk/familyhubsconsultation](http://www.kent.gov.uk/familyhubsconsultation).



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## DRAFT VERSION

### CONSULTATION FEEDBACK DRAFT RESPONSES

The formal responses to the consultation have been independently analysed. The tables below draw out the themes from the consultation feedback as identified by the independent analysis.

Also provided in the table below is the draft response to the feedback themes.

The first section relates to feedback on Seashells.

The second section related to feedback on Millmead.

The third section relates to relevant feedback provided across both sites.

The draft KCC responses are provided for consideration by the Cabinet Member.

#### Section 1: Seashells.

Consultation feedback relating to Seashells (as detailed in the Consultation Report)	
Consultation Feedback	Draft KCC Response
Seashells must not close: vital to / an integral part of the community, used by many families; closing it would have a significant impact	<p>It is acknowledged that Seashells plays an important role for the local community.</p> <p>The proposal is <b>only</b> related to the services that are commissioned under the Family Hub contract. Other services such as nurseries and health provision would remain at the centres.</p>
Gateway will not be able to offer the same level of service, it's not big enough, will not be able to house all the services on offer at Seashells	<p>It is acknowledged that the Seashells centre was purpose built. However, the services which are funded under this contract can effectively be delivered from many different locations and utilising the Gateway means that the Family Hub service can be retained for local families.</p> <p>Some capital investment can be made available from existing agreed budgets to make amendments to the Gateway location with regards to safeguarding and appropriate use of space.</p>
Seashells is invaluable for children; their development, enjoyment, wellbeing, socialising, soft play, nursery.	<p>The Family Hub offer across the whole county, including the proposed offer at the Gateway, will continue to assist with the development, enjoyment, wellbeing and socialising for children.</p> <p>The nursery provision is not one of the services commissioned under the Family</p>

	<p>Hub contract and therefore is not one of the services that would end if the contracts were not re-commissioned.</p>
<p>Seashells / the staff are welcoming, supportive, make you feel part of a family / concern staff will lose their jobs</p>	<p>The Family Hub model across the whole county is designed to be a welcoming and a supportive place for whole families to come and receive support, advice and guidance.</p> <p>Staff that are currently delivering the Family Hub commissioned services at Seashells and Millmead are eligible for TUPE transfer. KCC HR colleagues are engaging with the providers on this issue.</p>
<p>Seashells offers key support to (new) mums / parents and babies, postpartum support and invaluable for parents raising their children</p>	<p>The Family Hub model across the county provides precisely this support for all mums, including new mums and mums-to-be. This service will be available at Gateway if the contract is not recommissioned.</p>
<p>Gateway will have safeguarding issues; for children, being on the high street / possibility of passers-by / non-users / strangers walking in</p>	<p>Funding is available through the DfE Family Hub Transformation grant to undertake capital works to facilitate the safe and appropriate use of the Gateway site.</p> <p>This may include safeguarding the access following this specific concern being raised. This will not interfere with the universal access of the building but will alleviate concerns that children may be able to run out into the road.</p> <p>The site is used by other agencies, including Children's Services and it is considered beneficial for service users to be able to access the wide range of services on offer in the one location.</p>
<p>Seashells is local, accessible on foot, with pushchairs / for the disabled; many wouldn't be able to access other centres, nor afford to use transport</p>	<p>The Sheppey Gateway is a level access site and is situated in the middle of the town, approximately 0.2 miles away from the Seashells Centre.</p>
<p>Seashells has a free accessible car park, Gateway does not</p>	<p>It is acknowledged that parking is not available at the Gateway, however many Family Hubs across the county do not have dedicated parking for service users.</p> <p>Parking is available a short distance from the Gateway. However, users do need to pay for this.</p>

	<p>It is therefore acknowledged within the Equality Impact Assessment that the impacts of this change may be particularly felt by those with a disability that affects their ability to walk.</p>
<p>Seashells provides a social aspect / making friends / prevents social isolation</p>	<p>The network of Family Hub locations across the county are designed to be places that families can attend and meet other families. Our network of Community Development Workers will work with families that are used to accessing Family Hub services at Seashells and support their transition. We are also developing a network of peer mentors and Family Coaches that will help build the sense of community.</p>
<p>Seashells is a warm, safe, secure, trusted, reliable space.</p>	<p>The role that the centre plays in its own right is acknowledged. However, the Family Hub network across the county is designed to be a safe and welcoming place where parents can access a range of support and guidance. Since Kent County Council rolled out Family Hubs we have received positive feedback from families and children about how welcome and supported they feel.</p>
<p>Gateway is not family friendly</p>	<p>Our Gateway and Library spaces are universally accessible and welcoming for all residents of Kent.</p> <p>Funding is available through the DfE Family Hub Transformation grant to undertake capital works to facilitate the safe and appropriate use of the Gateway site.</p>
<p>If Seashells closed, we / many would be unable to attend anywhere else</p>	<p>Our network of Community Development Workers will help families with the transition to using the alternative site.</p> <p>The current proposals only affect the recommissioning of the Family Hub element delivered at Seashells and <b>do not</b> impact on the other services offered from there. Families and children will be able to access all the other services i.e. nursery, health services, food bank, etc offered from Seashells.</p> <p>The proposed alternative location at Sheppey Gateway is 0.2 miles away.</p>

<p>Seashells is good for mental health support, has mental health session</p>	<p>Subject to continued need and timetabling, the Family Hub service at the Gateway could provide sessions focused on mental health, particularly Perinatal Mental Health, as well as more generally focused on assisting overall wellbeing for families.</p>
<p>Gateway is used by too many other services: banking, library, clubs</p>	<p>The site is used by/for other services and other agencies, and it is considered beneficial for service users to be able to access the wide range of services on offer in the one location.</p>
<p>Seashells is a lifeline to many</p>	<p>It is acknowledged that the centre plays an important role for local communities.</p> <p>The proposal is only related to the services that are commissioned under the Family Hub contract. Other services such as nurseries and health provision would remain at the centre and families can continue to access those services, if they choose to do so.</p>
<p>Seashells has outdoor space / we have no garden / children can play outside</p>	<p>It is acknowledged that the Gateway does not benefit from a secure open space. There are however other facilities locally where free open space is available for families.</p>
<p>Seashells is an information resource / they provide advice and signposting</p>	<p>The Family Hub model across the whole county is designed to be a welcoming and supportive place for whole families to come and receive support, advice and guidance. This includes signposting or referral to other available advice and support.</p>
<p>This is an area of recognised high deprivation; closing it would impact the most vulnerable / in need, pushing them further into deprivation</p>	<p>The level of deprivation in the ward is acknowledged. Patterns of deprivation have been present consistently within this community for a long time.</p> <p>A comparative Family Hub service (although not like-for-like) can be delivered from the Gateway setting, subject to specific timetable arrangements.</p>
<p>Seashells is safe for children, has door release button / children can play safely / away from the busy high street</p>	<p>Gateway is a structurally a safe building.</p> <p>Funding is available through the DfE Family Hub Transformation grant to undertake capital works to facilitate the safe and appropriate use of the Gateway site for the work with children and families.</p>

	<p>This may include safeguarding the access following this specific concern being raised. This will not interfere with the universal access of the building but will alleviate concerns that children may be able to run out into the road.</p>
<p>Seashells has health clinics, baby weigh clinics, health visitors</p>	<p>The proposal is only related to the services that are commissioned under the Family Hub contract. Other services such as nurseries and health provision would remain at the centres. The decision will not impact on the continuation of these services from Seashells.</p>
<p>Gateway is only open 4 days a week</p>	<p>We will have the opportunity to review the opening of the Gateway considering the additional services that will be provided.</p> <p>The provision of activity under the Family Hub contract at Seashells is approximately 14 hours a week. The provision of at least 14 hours Family Hub activity per week can be accommodated at the Sheppey Gateway.</p>
<p>Seashells has the food bank which many rely on</p>	<p>The proposal is only related to the services that are commissioned under the Family Hub contract. Other services such as the food bank which are run from Seashells are not within the scope of the decision. Families may continue to avail themselves of this service, should they choose to do so.</p>
<p>There are lots of (free) clubs, activities, sessions, groups, invaluable to many who couldn't afford otherwise</p>	<p>Free sessions and activities are a key part of the Family Hub offer across the county and would be included within any timetable for services at the Gateway. Families across the county who access our Family Hubs' free services have offered positive feedback about the activities that are offered.</p>
<p>There is no private space at the Gateway</p>	<p>There are spaces at the Gateway that can be used for private sessions and confidential conversations.</p>
<p>Taking it away will cause more social problems, including an increase in referrals to family support services</p>	<p>The level of need that families who access Seashells have is below the threshold for statutory intervention and so we would not expect current families accessing these services to be facing issues that qualify for statutory intervention. As a result, we do not</p>

	<p>expect to see an increase in families requiring referral to the Front Door team.</p> <p>The duty to provide statutory services under Children Act 1989 or 2004 is not part of the current contract in place for Seashells and it is not a function that Local Authorities can commission out to voluntary, community and social enterprise sector (VCSEs).</p>
Seashells has sensory rooms, used by many	The sensory room at Seashells was put in outside of the commissioned contract for Family Hubs and is therefore unaffected by this proposal.
Comments / reasons for not using Gateway / Gateway should not be used	The proposal to use the Gateway means that the Family Hub service can be retained for local residents whilst the Council works to address the significant financial challenges that it faces.
Seashells is inclusive / equality is all they know / everyone is welcome	The Family Hub model across the whole county is designed to be a welcoming and supportive place for all families across all parts of our community to come and receive support, advice and guidance. This includes signposting or referral to other available advice and support.
Seashells serves some of the most vulnerable and deprived residents / areas / plans discriminate against those people / people living in Sheerness	The level of deprivation in the ward is acknowledged. A comparative Family Hub service (although not like-for-like) can be delivered from the Gateway setting, subject to specific timetable arrangements.
Consider the children / the impact on their lives and their futures without the safety, support, familiarity, importance of Seashells	<p>The proposal is only related to the services that are commissioned under the Family Hub contract. Other services such as nurseries and health provision would remain at the centres</p> <p>The Family Hub offer across the whole county, including the proposed any offer at the Gateway will continue to assist with the development, enjoyment, wellbeing and socialising for children.</p>
Consider accessibility for users with a disability / mums with pushchairs	The Gateway site has level access and whilst it is across two floors, the site benefits from a lift for those users that require it.
Discriminates against those who are losing access to services, e.g. especially mums and babies	It is acknowledged within the Equality Impact Assessment that most users of the services are mums, children and babies. Therefore, the impact of these changes may be disproportionately felt by those groups.

	<p>However, the proposal to use the Gateway means that the Family Hub service can be retained for local residents whilst the Council works to address the significant financial challenges that it faces.</p>
<p>Consider those with SEN needs, the neurodivergent, discriminates against those if no longer able to access services</p>	<p>The proposal to use the Gateway means that the Family Hub service can be retained for local residents whilst the Council works to address the significant financial challenges that it faces.</p> <p>We acknowledge that changing locations presents challenges for families coping with additional SEND needs. Our network of Community Development Workers will work with families that are used to accessing services at Seashells and support their transition, linking in with our SEND service as required.</p>
<p>Not representative of the area, needs to be a local / community assessment</p>	<p>The Gateway is a local space used to deliver services to the community.</p>
<p>If the funding is withdrawn, it is likely that Seashells would face no alternative other than to charge room rates, at the moment all room space is free of charge.</p>	<p>This is a commercial decision for the independent company running the centre.</p> <p>There are national funding streams available for voluntary, community and social enterprise sector that the company running the centre can apply for, if interested.</p>
<p>Families will not access Sheppey Gateway as it is seen as a negative place to go (i.e. you only go there if you have a problem with housing or benefits).</p>	<p>Our network of Community Development Workers will work with families that are used to accessing services at Seashells and support their transition to Gateway.</p> <p>Sheppey Gateway also houses a library. KCC Libraries are universally accessible and all residents in Kent are welcome. There is positive feedback from residents related to KCC libraries.</p>

## Section 2: Millmead

Consultation feedback relating to Millmead (as detailed in the Consultation Report)	
Consultation Feedback	Draft KCC Response
<p>Millmead is local / accessible / many wouldn't be able to go elsewhere / unable to even afford the bus fare / mums with pushchairs can walk there / mums postpartum can access / others are uphill and inaccessible to mums on foot</p>	<p>It is acknowledged that the current Millmead site is accessible for local families.</p> <p>The Family Hub model across Margate includes three other centres all within 1.5 miles. It is acknowledged that this may present a barrier for some and that travel on foot is not possible for all.</p> <p>As a result of this feedback, KCC will provide parents and children bus tickets for those that previously accessed services from Millmead and now can't afford the bus fares to access the other Family Hubs from Margate.</p> <p>We maintain that there is sufficient provision to meet local need. Time-limited assistance to cover the cost of transport to the alternative venues would be offered as a means of helping support service users through the transition.</p>
<p>Millmead must not be closed: is much needed resource, relied upon by many families, offering lots to local often deprived families, closing it would be devastating, save money elsewhere</p>	<p>It is acknowledged that the centre plays an important role for the local community.</p> <p>The proposal is only related to the services that are commissioned under the Family Hub contract. Other services such as nurseries and health provision would remain at the centre and are not funded by Kent County Council through the existing contract.</p> <p>The provision of activity under the Family Hub contract at Millmead is approximately 9 hours a week. The provision of at least 9 hours Family Hub activity per week can be accommodated at the other centres.</p> <p>KCC is required to make savings across a wide range of services to meet the financial challenge currently faced by the Authority. The Statutory Duty on KCC to provide sufficient access to Children's Centres can still be met and as such it is felt that it is acceptable to make these savings. The rest of the in-house Family Hub network was</p>



	<p>subject to similar savings in previous decisions.</p>
<p>Lots of deprived children attend Millmead: is invaluable for their development, enjoyment, well-being, socialising, soft play, nursery, Sure Start</p>	<p>The level of deprivation in the ward is acknowledged.</p> <p>The Family Hub offer across the whole of Margate will continue to assist with the development, enjoyment, wellbeing and socialising for children.</p> <p>There are three alternative Family Hub locations within Margate, all within 1.5 miles of the Millmead Centre.</p> <p>Families across the county who access our Family Hubs' free services have offered positive feedback about the activities that are offered.</p> <p>The nursery provision is not one of the services commissioned under the Family Hub contract and therefore is not one of the services that would end if the contracts were not re-commissioned.</p>
<p>The staff at Millmead are welcoming / supportive / we trust them and we and the children have developed close relationships with them</p>	<p>The Family Hub model across the whole county is designed to be a welcoming and supportive place for whole families to come and receive support, advice and guidance.</p> <p>Staff that are currently delivering the Family Hub commissioned services at Seashells and Millmead are eligible for TUPE transfer. KCC HR colleagues are engaging with the providers on this issue.</p>
<p>Millmead is a safe / warm / secure / comforting / familiar / welcoming environment</p>	<p>The Family Hub model across the whole county is designed to be a welcoming and supportive place for all families across all parts of our community to come and receive support, advice and guidance. This includes signposting or referral to other available advice and support.</p> <p>There are three alternative Family Hub locations within Margate, all within 1.5 miles of the Millmead Centre.</p>
<p>Millmead has a free accessible car park / others do / may not</p>	<p>It is acknowledged that whilst limited free parking is available at Northdown Road Family Hub, it is not available at all the alternative locations proposed. Many</p>

	<p>Family Hubs across the county do not have dedicated parking for service users.</p> <p>Parking is available a short distance from the other locations, however, users may need to pay for this.</p> <p>It is therefore acknowledged within the Equality Impact Assessment that the impacts of this change may be particularly felt by those that manage a disability that affects their ability to walk.</p>
<p>There are lots of clinics attended / health visitor / baby weigh / healthy child clinic</p>	<p>The proposal is only related to the services that are commissioned under the Family Hub contract. Other services such as nurseries and health provision would remain at the Millmead and are not within the scope of the current contract that is under review.</p> <p>There are national funding streams available for voluntary, community and social enterprise sector that the company running the centre can apply for, if interested.</p>
<p>Millmead is relied upon by new mums, provides postpartum support, breastfeeding support, used by lots of mums / parents with babies</p>	<p>The Family Hub model across the county provides precisely this support for all mums, including new mums and mums-to-be.</p> <p>Infant feeding support and postpartum support are key parts of the service offer available in the other Margate Family Hubs.</p>
<p>Many families would no longer be able to attend, use services if Millmead closed</p>	<p>Our network of Community Development Workers will work with families that are used to accessing services at Millmead and support their transition.</p> <p>There are three alternative Family Hub locations within Margate, all within 1.5 miles of the Millmead Centre.</p> <p>Time-limited assistance to cover the cost of transport to the alternative venues would be offered as a means of helping support service users through the transition.</p>
<p>Others will not be able to offer the same level of service, it's not big enough, will not be able to house all the services on offer at others</p>	<p>The Family Hub services provided under the commissioned contract are available at the alternative Family Hub sites in Margate.</p> <p>Capacity within these location exists</p>

<p>Clubs, events, activities are free, couldn't afford to pay for such like, we attend lots of activities we wouldn't be able to otherwise</p>	<p>Free sessions and activities are a key part of the Family Hub offer across the county and would be included within any timetable for services at the other Family Hubs from Margate.</p> <p>The provision of activity under the Family Hub contract at Millmead is approximately 9 hours a week. The provision of at least 9 hours Family Hub activity per week can be accommodated at the other centres.</p> <p>Families across the county who access our Family Hubs' free services have offered positive feedback about the activities that are offered.</p>
<p>Change not good for those with anxiety - places, people, surroundings, means they would not be able to attend elsewhere</p>	<p>We acknowledge that changing locations presents specific challenges for families coping with anxiety or additional needs. Our network of Community Development Workers will work with families that are used to accessing services at Millmead and support their transition, linking in with our SEND service as required.</p>
<p>Other hubs would be stretched</p>	<p>There is capacity within the other hubs to deliver services to families currently accessing Millmead.</p>
<p>Millmead has baby sensory rooms / classes</p>	<p>The sensory room at Millmead was put in outside of the commissioned contract for Family Hubs and is therefore unaffected by this proposal.</p>
<p>Millmead provides a social aspect / making friends / prevents social isolation</p>	<p>The network of Family Hub locations across the county are designed to be places that families can attend and meet other families. Our network of Community Development Workers will work with families that are used to accessing services at Millmead and support their transition. We are also developing a network of peer mentors and Family coaches that will help build the sense of community.</p>
<p>Millmead is accessible for the disabled, all on one level</p>	<p>The other Family Hub sites are equally accessible.</p>
<p>Others are not family friendly, not set up for families and children</p>	<p>The Family Hub model across the whole county is designed to be a welcoming and supportive place for all families across all parts of our community to come and receive support, advice and guidance.</p>

	Families across the county who access our Family Hubs services have offered positive feedback about the support they received from practitioners.
Millmead is a lifeline for many families	The proposal is only related to the services that are commissioned under the Family Hub contract. Other services such as nurseries and health provision would remain at the Millmead.
Millmead provides lots of information and advice, signposting	The Family Hub model across the whole county is designed to be a welcoming and supportive place for all families across all parts of our community to come and receive support, advice and guidance. This includes signposting or referral to other available advice and support.
Millmead is inclusive / equality is all they know, everyone is welcome	The Family Hub model across the whole county is designed to be a welcoming and supportive place for all families across all parts of our community to come and receive support, advice and guidance.  Families across the county who access our Family Hubs services have offered positive feedback about the support they received from practitioners.
Consider accessibility for disabled, mums with pushchairs - Millmead is very accessible	The other Family Hub sites are equally accessible. However, it is acknowledged that the impact of changing service locations is likely to be more challenging for service users managing disabilities.  Our network of Community Development Workers will work with families that are used to accessing services at Seashells and support their transition.
Discriminates against those who are losing access to services, e.g. mums and babies	It is acknowledged within the Equality Impact Assessment that the majority of users of the services are mums, children and babies. Therefore, the impact of these changes may be disproportionately felt by those groups.  However, the proposal to use the alternative Family Hub locations means that the Family Hub service can be retained for local residents whilst the Council works to address the significant financial challenges that it faces.

<p>Not representative of the area / needs to be a local / community assessment</p>	<p>The three proposed alternative Family Hubs are all local spaces used to deliver services to the community.</p>
<p>Consider those with SEN needs, the neurodivergent, discriminates against those if no longer able to access services</p>	<p>The proposal to use the alternative Family Hub sites means that the Family Hub service can be retained for local residents whilst the Council works to address the significant financial challenges that it faces.</p> <p>We acknowledge that changing locations presents specific challenges for families coping with additional SEND needs. Our network of Community Development Workers will work with families that are used to accessing services at Millmead and support their transition, linking in with our SEND service as required.</p>
<p>Consider those with mental health issues</p>	<p>Subject to continued need and timetabling the Family Hub service at the alternative sites proposed, sessions will be provided focusing on mental health, particularly Perinatal Mental Health, as well as more generally focused on assisting overall wellbeing for families.</p> <p>We acknowledge that changing locations presents specific challenges for families coping with mental health concerns. Our network of Community Development Workers will work with families that are used to accessing services at Millmead and support their transition, linking in with our SEND service as required.</p>
<p>Consider safeguarding - others are not safe for children – location / building nor from other users</p>	<p>The proposed alternative Family Hub sites are all safe for children and families to access and are currently operational Family Hub sites.</p> <p>There are no health and safety concerns in any of the Family Hubs buildings in Margate.</p> <p>All staff who work in the Family Hubs services including those in Margate are Disclosure and Barring Services (DBS) checked and pose no risk of harm to children. All the staff working in the Family Hubs estate have receive comprehensive training to offer safe and evidence-based support to children and families.</p>

<p>In Margate, there are three Family Hubs close to each other. One of those should be closed to save Millmead.</p>	<p>The revenue saving (running costs) of closing one of the other three Family Hubs in Margate is approximately £41,000 and therefore would not meet the saving target.</p> <p>Millmead have been approached to ascertain the potential costs of hiring space to provide a KCC run Family Hub service from the centre (as opposed to a commissioned contract under which the provider provides the service from their own building). Hire costs have been estimated as between £65k and £85k per year.</p> <p>If KCC cease services at the location that costs £41k a year and hired space, the impact on the KCC revenue budget would therefore be an additional pressure of at least £25k (£65k minimum hire charge minus £41k saving at the closed centre). These are property costs, not staffing costs.</p>
<p>The variety of services available at Millmead is important and this cannot be replicated elsewhere.</p>	<p>The wider Family Hub network of services available to residents at the alternative sites is equally beneficial. The wider service offer available will adapt over time in response to the need of the community accessing the Family Hub network.</p>
<p>Important health concerns might go unnoticed due to lack of proximity to medical facilities since Millmead is the only place families go to.</p>	<p>Health services are outside of the scope of the commissioned Family Hub services and are therefore not part of Kent County Council's proposals to move out of Millmead should the commissioned contracts not be renewed.</p>

### Section 3: Feedback relevant across both sites

<p><b>Consultation feedback relevant across both sites</b></p>	
<p><b>Consultation Feedback</b></p>	<p><b>Draft KCC Response</b></p>
<p>The loss of this significant revenue will result in the closure of both centres, with community midwifery being displaced.</p>	<p>The proposal is <b>only</b> related to the services that are commissioned under the Family Hub contract. Other services such as nurseries and health provision would remain at the two centres and are not within the scope of the current contract that is under review.</p> <p>The extent and value of the commercial relationship between the two companies running the two centres and the various Health providers is unknown to Kent County Council; however, that commercial relationship is not within to scope of the current contract review.</p>

	<p>There are national funding streams available for voluntary, community and social enterprise sector that the companies running the two centres can apply for, if interested.</p>
<p>Limited availability of alternative clinical spaces should the Family Hubs in Seashells and Millmead close.</p>	<p>The proposal is only related to the services that are commissioned under the Family Hub contract.</p> <p>The extent and value of the commercial relationship between the two companies running the two centres and the various Health providers is unknown to Kent County Council; however, that commercial relationship is not within the scope of the current contract review.</p>
<p>Most of the alternative locations that may be suitable for relocation of community midwifery services from Millmead and Seashells are already full given the outcome of the communities services consultation.</p>	<p>The proposal is only related to the services that are commissioned under the Family Hub contract.</p> <p>Health Visiting and Midwifery services, whilst a part of the wider Family Hub network, are not within the scope of the current commissioned contracts. It is up to the companies that run Millmead and Seashells to negotiate their commercial relationship with the Health providers should they choose to do so.</p>
<p>Whilst the consultation document states that the proposals set out in the consultation do not directly impact Kent Community Health Foundation Trust (KCHFT), there are concerns that the services KCHFT deliver will indirectly be affected.</p>	<p>The proposal is only related to the services that are commissioned under the Family Hub contract.</p> <p>Health Visiting and Midwifery services, whilst a part of the wider Family Hub network, are not within the scope of the current commissioned contracts and therefore could stay in place at Millmead and Seashells if required.</p> <p>Service delivery requirements for Kent Community Health Foundation Trust (KCHFT) can be reviewed regularly to determine whether additional capacity is required. This can be monitored through the KCC Public Health Commissioning team. Additional spaces can be made available if required on Sheppey at either the Queenborough Library co-location site or at the Sheppey Gateway. Clinical space is</p>

	<p>already available in Thanet at all three alternative sites – Northdown Road Family Hub, Cliftonville Family Hub and Margate Family Hub.</p>
<p>KCHFT is mindful that this could potentially result in both Family Hubs charging KCHFT for delivery space which has previously been provided free of charge as a way to secure additional funding streams.</p>	<p>This may present an additional cost pressure (approx £30k per annum) for the Public Health commissioned contracts to KCHFT.</p> <p>The commercial relationship between KCHFT and the two companies running Millmead and Seashells is not within the scope of the contract that is under review.</p>
<p>Concerns that the purpose of moving services is that KCC hopes to wind the services down?</p>	<p>KCC is not intending to wind down the Family Hub service. Investment from the Department for Education over the last three years has facilitated the transformation from our previous Open Access service to the new Family Hub model. Part of the funding is to ensure the service is operationally sustainable.</p>
<p>Families may not wish to access services in the building with children’s social services creating a barrier.</p>	<p>A strength of the whole Family Hub network is that it draws on the links across the wider Early Help system, including our social services support to assist families where needed.</p>
<p>Concerns that there has been a distinct lack of communication on KCC’s part to fully investigate the impact of the changes and a more thorough options appraisal should have been carried out to seek options that do not create such huge disparity in the level of service being proposed to what is required</p>	<p>An options appraisal was carried out in advance of the consultation, and this was detailed within the information available for residents.</p> <p>Following the consultation response, an additional option has been considered which assesses the possibility of not renewing the commissioned contracts, but instead renting space within the centres for Kent County Council to deliver the Family Hub services.</p>
<p>Safeguarding and child protection issues will increase if the centres close – lives will be lost.</p>	<p>Our Family Hub service provides a wide range of services for all families across universal and targeted levels of need (as the term ‘need’ relates to the Kent County Council children’s services offer). The universal and targeted levels of need sit under the threshold for statutory Children Services intervention who assess and support children in need, children who suffer or are at risk of suffering significant harm and children in care.</p>



	<p>The duty to provide statutory services under Children Act 1989 or 2004 is not part of the current contract in place for the two children's centres and it is not a function that Local Authorities can commission out to voluntary, community and social enterprise sector (VCSEs).</p> <p>Families that have a higher level of need and where children are in need or are at risk of or suffer significant harm receive support from Children Social Work Teams and intensive Early Help. The statutory duties provided by Kent County Council in regards service delivery under the various Children Act provisions remains unchanged as a result of this proposal. These services are still available through existing channels and partnerships across the wider Early Years network.</p>
<p>The community pantry and clothes bank are vital for the community and should not be lost.</p>	<p>These services are not part of the commissioned Family Hub contract and therefore fall outside of this proposal.</p>
<p>If contracts not renewed, community midwifery will be displaced alongside other services</p>	<p>The community midwifery service sits outside of the commissioned Family Hub services at Millmead and Seashells and therefore the service delivery is not within the scope of the current contract.</p> <p>Despite this, in Margate all three Family Hub locations already include clinical space for use by community midwifery. The Sheppey Gateway can be adapted to include clinical space for community midwifery if required.</p>
<p>Impact on single dads and their mental health will be impacted.</p>	<p>Our Family Hub network across the county is a welcoming and supportive place for all parents and carers. Through our Start for Life insights work we have developed z-cards and one-minute interaction guidance for all Family Hub staff to help boost engagement with dads.</p> <p>Our continued work with Dadspace is developing our offer to fathers, with a focus on their mental health and the relationship with their children. If needed this is something that can be broadened to deliver specific sessions for dads in these areas.</p>

<p>There will be a large impact on schools having to take in children that have not had the early intervention that Millmead and Seashells Family Hubs offer.</p>	<p>The Family Hub service will still be available to local people online (for example the free Easy Peasy app) and at the alternative sites proposed.</p> <p>Any families in Margate and on the Island of Sheppey have several opportunities to engage with the Family Hubs services should they choose to do so.</p>
<p>Both of these locations were pilot Family Hub sites, how can they now be closed?</p>	<p>Both Millmead and Seashells have played an important role in the transformation of the Family Hub model in Kent.</p> <p>However, the financial challenges that the Council face are significant and all options for easing the pressure on the budget are being explored.</p> <p>The contracts for these two centres have always been time limited and they end in March 2025. It is therefore timely and appropriate to consider whether the services can be delivered to families locally in a way that meets their needs while helping to address the Council's financial challenges.</p>

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**From:** Rory Love – Cabinet Member for Education and Skills

Sarah Hammond, Corporate Director of Children, Young People and Education

Christine McInnes, Director of Education and SEN

**To:** Children, Young People and Education Cabinet Committee

**Subject:** Special School Review

**Decision no:** 24-00097

**Key Decision :** Key Decision

- Multi-division impact
- Significant service review / development

**Classification:** Unrestricted

**Past Pathway of report:** Children’s Young People and Education Cabinet Committee – 16<sup>th</sup> May 2024

**Future Pathway of report:** Cabinet Member Decision

**Electoral Division:** All electoral divisions

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**Is the decision eligible for call-in?** Yes

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**Summary:** The aim of this report is to set out the proposed next steps in KCC’s strategic planning for state-funded special school provision in Kent for children and young people with special educational needs. It follows a public consultation on proposals related to:

- Changes to the designation and accompanying admissions guidance for some special schools in Kent. 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.
- Introduction of a School-to-School model of support - 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.

The report will summarise the key findings from the special school review and the subsequent consultation. It will then outline how amended proposals would be introduced, alongside a future proposed phasing of the special school review which will address new areas identified during the consultation.

**Recommendation(s):**

That the Children, Young People and Education Cabinet Committee is asked to consider and either ENDORSE or MAKE RECOMMENDATIONS to the Cabinet Member on the proposed decision as set out in this report and the Proposed Record of Decision (Appendix 5)

**1. Introduction**

- 1.1 Following two critical SEND Area Inspection reports in 2019 and 2022, Kent County Council (“**KCC**”) has been working to reform the education system in Kent to improve the educational provision and opportunities for children and young people across the county. This reset has been fully co-constructed with the full spectrum of stakeholders in the sector, and it will enable KCC to fulfil its statutory duty to commission good quality school places matched to pupil need. This work has been reported on previously and includes:
  - 1.1.1 A review and action plan for Early Years.
  - 1.1.2 Investment over four years in training and development of mainstream school staff and governors, to make mainstream schools more inclusive (this is ongoing and increasingly practitioner led).
  - 1.1.3 A review of Specialist Resource Provision (“**SRP**”) in mainstream schools resulting in a new, consistent Service Level Agreement, providing transparency about the offer pupils can access and greater clarity on the value this provision adds.
  - 1.1.4 A review and action plan for post-16 provision, known as the Pathways for All programme.
  - 1.1.5 The KCC Commissioning Plan for School Places and the SEND Sufficiency Plan and;
  - 1.1.6 The draft Education Accessibility Strategy for 2024-27 and Schools Access Initiative Policy and Procedure.
  
- 1.2 Work is also on-going to improve KCC’s commissioning of school places from the private sector.
  
- 1.3 To develop a cohesive continuum of education provision for children and young people with additional and Special Educational Needs, it is therefore essential to also consider the role of the state funded special school sector so that all children with special educational needs and disabilities (“**SEND**”) in its area have access to suitable education, within their local communities. The aim is that this provision will prepare them for adulthood and will be an efficient use of resources, through KCC fulfilling its statutory duties by commissioning places that the data shows are needed.

- 1.4 On 16th May 2024, Local Authority Officers presented papers related to Kent County Council's system wide transformation projects to the Children, Young People and Education ("CYPE") Cabinet Committee. These reports encompassed the Special School Review, the Locality Model for Special Educational Needs Inclusion (now termed Communities of Schools) and the Specialist Resource Provision Review. The content detailed the coordinated work undertaken since November 2022 to review historic and current issues and gaps in state-funded education for children with SEND. This included special school provision and a proposed plan to implement cohesive system-wide change within the Kent SEND education system. These changes aim to address the related issues raised in the 2019 OFSTED inspection and the subsequent re-inspection of 2022.
- 1.5 In relation to the Special School Review, the Committee endorsed public consultation, following the extensive preparatory work outlined above, to obtain feedback on proposals to change the SEN designations (i.e. the type of SEN provided) for some special schools in Kent, and changes to admissions guidance for certain schools. The consultation also sought feedback on proposals to adopt a new school-to-school support model (the "**Consultation**"). The Consultation was the first step in KCC's decision-making process. Any changes to the type of SEN provision made at maintained schools can only be implemented by following statutory procedures, and no final decision will be taken until those procedures are completed.
- 1.6 The aim of the proposals is that KCC will plan special school places for children and young people who have severe and complex special educational needs, so that such children and young people can access suitable special school places in or near to their local community to support them in preparation for independence in adulthood.
- 1.7 The proposals under consideration at this stage are to:
- Propose changes to the designations and accompanying admissions guidance for some special schools in Kent. 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.
  - The introduction of a new School-to-School model of support - 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.
- 1.8 The changes proposed are consistent with KCC's statutory duties, including its duty to plan sufficient school places for all children with SEND. As part of its programme to transform SEND provision across the county, KCC has planned special education provision for children across mainstream schools, Specialist Resource Provisions ("**SRP**") in mainstream schools, and special schools. The aim of planning special school places for children and young people who have severe and complex special educational needs must be viewed alongside the ongoing work to improve educational provision for all

children and young people with SEND, including in mainstream and SRP settings.

- 1.9 This is being addressed in mainstream schools through the Countywide Approach to Inclusion Education, previously endorsed by CYPE Cabinet Committee and by having defined clear expectations for supporting children with SEND through KCC's Mainstream Core Standards. The proposed new school-to-school support model is also intended to improve the SEN provision for children attending mainstream schools. In SRPs, places have been planned for children with SEND who have an Education, Health and Care Plan ("EHCP"), who can potentially follow a mainstream curriculum with reasonable adjustments, specialist input and/or adaptations, and would be able to engage in some learning and or socialisation in a mainstream environment during their school career.
- 1.10 The initial recommendations presented to CYPE Cabinet Committee in May 2024 have been further developed following an analysis of the public consultation feedback, and data and evidence that has been collected by KCC. This paper presents the proposed next step in considering changes to be made to Kent's special school sector.
- 1.11 It should be noted that any of the changes to the special school provision in Kent that are detailed in this paper would apply to admissions from September 2026, with incremental change taking place year on year. Children who already have placements in special schools in Kent would remain in their current placements, with their needs continuing to be reviewed in accordance with the usual EHCP annual review process as happens now.
- 1.12 It is also essential to view these proposals within the broader context of KCC's SEND transformation programme, which will continue with the implementation of the Communities of Schools (previously termed the Locality Model for Special Educational Needs Inclusion) in September 2025. The Communities of Schools model focuses on KCC and mainstream schools working together to make mainstream schools more inclusive, and for them to provide suitable education for children and young people with SEND. It is focused on developing greater collective responsibility for children and young people with SEND in a local area co-terminus with health boundaries wherever possible and improving financial control of the High Needs Funding Budget.
- 1.13 The earlier planned implementation of the Communities of Schools model would mean that those changes have one year to embed before any gradual adjustments to the designation of special schools in Kent would be made. In conjunction with the above proposals, it is intended that SRP provision will also grow across Kent to address gaps identified through the SRP review. These changes will work jointly to create clear curriculum pathways focused on meeting the needs of all children and young people with SEND and preparing all children and young people with SEND for independence in adulthood.

## 2. Context

### Safety Valve Agreement with DfE

- 2.1 KCC entered into a Safety Valve agreement with the DfE in May 2023. The DfE Safety Valve Programme is designed to eliminate KCC's deficit in its Dedicated Schools Grant by the end of 2027-2028. By this agreement with the DfE, KCC has agreed to implement a DSG management plan. This includes action to implement the Countywide Approach to Inclusion Education, by improving the SEN offer in mainstream provision (which is also the subject of a separate consultation) and by ensuring there is sufficient and consistent capacity across the county to support children with severe and complex needs in their local area where possible.
- 2.2 Part of this programme includes KCC reviewing the specialist education continuum to ensure only the most severe and complex needs are supported in special schools. The Safety Valve agreement allows Kent to return to a position that fulfils its statutory duty to provide SEN support within the financial envelope provided to KCC in a sustainable and measured manner.

### Current special school provision

- 2.3 Kent's current pattern of special school provision originated from a reorganisation that took place 20 years ago. That reorganisation marked a change from special schools catering for pupils with moderate learning difficulties and those with speech and language or specific learning difficulties. At the time, there was an anticipated reduction in demand for such provisions. Special schools for pupils with severe, profound, and multiple learning difficulties were expected to accommodate a small number of pupils with borderline moderate learning difficulties or severe learning difficulty. A summary of the historic decisions made in the previous special school reorganisation can be found in appendix A. This summary highlights what can be achieved when KCC and special schools work collectively to address the pressures present in a system where collective pupil need is no longer being met with existing provision.
- 2.4 The landscape for SEN provision in Kent has changed considerably since the previous reorganisation. The demand for specialist provision has risen significantly, placing substantial pressure on the system. The number of pupils in private and non-maintained special school placements has grown from 240 in 2006 to over 1,700, with associated costs now over £75 million (23% of the annual High Needs Funding allocation for Kent children with SEND in 2024-25). Similarly, the number of pupils in PSCN (profound, severe and complex needs) schools has far exceeded the original provision plan, now averaging 350 pupils per school and substantially more attending Five Acre Wood in Maidstone. Additionally, three new special free schools have been approved to open in the upcoming years, two of which are designated as PSCN schools:

- 2.4.1 Swanley Free Special School: Designated for pupils with PSCN, providing 250 places. Initial proposed opening of September 2026 (delay expected; awaiting an updated opening date).
- 2.4.2 Whitstable Free Special School: Designated for pupils with PSCN, providing 120 places. Initial proposed opening of September 2026 (delay expected; awaiting an updated opening date).
- 2.4.3 Estuary (formerly Nore) Academy: Designated for pupils with SEMH needs, providing 120 places (opening in January 2025).
- 2.5 Schools that we previously identified as “behaviour and learning” have evolved over time into SEMH schools, with Goldwyn and Portal House now accommodating children with a wider range of learning levels. Pupil numbers in these provisions have also surpassed initial planned numbers (Goldwyn originally designated for 60 places is now 195 and Portal House originally designated for 60 places is now 80). There has also been a significant increase in numbers of pupils with an autism diagnosis, with an associated growth in demand for specialist places.
- 2.6 Prior to 2018, KCC’s data was broadly in line with national data, but by the time of the 2019 inspection, KCC’s data showed rapidly increasing placements in special schools and an associated deviation from national data both in relation to the percentage of the child population for whom an EHCP is maintained and, the percentage of children placed in special schools, a trajectory of increases which has continued. This would strongly suggest management of the system in Kent is a critical factor in this variation, rather than a change in pupil needs.
- 2.7 KCC has historically planned some special school places whose curriculum pathway is aligned with children in a mainstream school. These are children who, in other Local Authority areas, have their needs met in mainstream schools. The hypothesis that Kent has placed children with more modest learning difficulties in special schools has been supported by some special school headteachers who have themselves identified pupils who could be successfully educated in mainstream schools. Kent now has the highest percentage of pupils aged 2-18 in special schools among all shire counties. Both the number of placements and the associated expenditure have increased significantly over the last five years, with spending on these provisions nearly doubling since 2018/19. Currently the average cost of educating a pupil with an EHCP in a mainstream school is £8,600, in a state funded special school £23,600 and in a private sector independent school £46,900. Published attainment data<sup>1</sup> shows during this time there has been no improvement in pupil outcomes, with the gap between all Kent pupils and those with SEND continuing to be in line with the national data. Following changes in service leadership, the poor attendance of pupils with EHCPs is now improving.

## Key Principles of the Special School Review

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<sup>1</sup> <https://explore-education-statistics.service.gov.uk/data-catalogue/data-set/44e1c9ad-3426-42ae-befe-a9378999e928>



2.8 The carrying out of the Special School Review was informed by the lessons learnt from the outcome of the previous one, alongside the extensive information gathered through the pre-consultation review process. The revised special school model addresses financial constraints and proposes strategic changes to ensure a financially sustainable approach, whilst applying a strong values-based approach to the changes proposed.

2.9 The key values underpinning the proposed changes presented in this report are:

2.9.1 Meeting needs locally: Education should be provided as close to home as possible, ideally within local mainstream schools, to enable pupils to remain part of their local community as they prepare for their place in the community in adulthood.

2.9.2 Equity of access: Access to support and provision for children and young people with SEND should not be determined by their place of residence. This calls for an equitable distribution of special school places across the county, ensuring that the provision aligns with varying levels of need in different areas accounting for population and socio-economic factors.

2.9.3 Pupil Outcomes: Kent plans special school placements for children and young people with severe and complex needs, so that those young people are supported in achieving outcomes of independence in adulthood through the provision of an adapted curriculum, as far as is possible.

### Shared Vision and Outcomes

2.10 The proposed changes, if adopted in due course, would align with both internal KCC strategies as well as those developed by our health sector partners, Integrated Care System (“**ICS**”) and NHS Kent and Medway. This collaborative approach focuses on improving services for children and young people with SEND, ensuring that efforts across education and health sectors are cohesive and work towards shared strategic goals.

2.11 These proposals should be considered alongside KCC’s Countywide Approach to Inclusive Education (“**CATIE**”)<sup>2</sup>, the SEND Strategy<sup>3</sup>, which has recently been subject to consultation, the Accessibility Strategy and the Education Strategy which is in development stage and follows the same principles that inform those two complementary papers. All have been created in collaboration with partners across health, social care and education sectors, as well as including input from parents, carers, children and young people.

2.12 The CATIE focuses on how children and young people with SEND are supported in mainstream education in Kent. It outlines that working together in a collaborative, sustainable system, will ensure equity of education. Key outcomes of the commitment to a Countywide Approach to Inclusive Education include the sense of belonging that children and young people with SEND

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<sup>2</sup> [A Countywide Approach to Inclusive Education \(kelsi.org.uk\)](https://www.kelsi.org.uk)

<sup>3</sup> [Documents | Kent SEND Strategy 2025-2028 | Let's talk Kent](#)

experience and the genuine respect and value promoted among all school children enabling them to achieve their best. The proposed changes are aligned with the move towards mainstream education becoming increasingly inclusive and supports the priorities detailed in the CATIE.

- 2.13 The Education Strategy emphasises the importance of ensuring all children and young people including those with SEND, are supported in their pursuit of ambition, curiosity, and resilience. This focus aligns with the strategic aims of both the special school review and the SEND strategy, including KCC's objective of ensuring that special school placements are planned so that children and young people with severe and complex SEN are able to access special school placements in their local areas.
- 2.14 The SEND strategy outlines KCC's vision for an inclusive, supportive and ambitious education system for all children and young people. The aim is to remove barriers to learning and participation in mainstream education, enabling children to grow and thrive within their local communities. Both the proposed special school changes and the SEND Strategy share a common belief that, with high aspirations, equitable access to educational opportunities, and appropriate support, children and young people with SEND can achieve successful long-term outcomes.
- 2.15 Research<sup>4</sup> demonstrates that with the appropriate attitudes, skills, and resources, most pupils' needs can be effectively met in mainstream settings, yielding both academic and social benefits for these pupils and their peers. The changes proposed are to ensure that mainstream schools are able to meet the needs of children and young people with SEN where it is suitable and appropriate to do so, and that SRPs and special school placements are available for children and young people with severe and complex SEN where their needs cannot be met in mainstream settings.
- 2.16 If mainstream education is not suitable, for example because of the extent to which curriculum needs to be adapted in order to provide suitable education, then children with SEN should attend a specialist provision, such as a special school or an SRP, within their local area. KCC's SEN provision should be capable of serving the vast majority of pupils without the need for out-of-Kent placements.
- 2.17 Parents of children with an EHCP can express a preference for a school placement for their child, and KCC will continue to comply with its statutory duties in individual cases, to accept those preferences, unless to do so would be incompatible with the provision of suitable education, the efficient education of others or the efficient use of resources
- 2.18 The ICS Strategy<sup>5</sup> is focused on supporting access and equity of provision and ultimately life chances for approximately 17,500 of our most complex and vulnerable children and young people. Key alignments between the special school review recommendations and the ICS Strategy include;

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<sup>5</sup> [Kent and Medway Integrated Care Strategy :: Kent & Medway ICS \(kmhealthandcare.uk\)](https://www.kent.gov.uk/media/1000000/kent-and-medway-integrated-care-strategy-2021-2026)

- 2.18.1 Improving outcomes for children and young people: Both emphasise improving health, education, and long-term prospects for children, especially those who are vulnerable or have specific needs.
- 2.18.2 Addressing health inequalities: There is a shared focus on reducing disparities in health and care access, ensuring that services are equitable and responsive to local needs.
- 2.18.3 Early intervention and targeted support: Both prioritise early and targeted interventions for vulnerable children, aiming to improve their independence over the long term.
- 2.18.4 Localised and specialised care: A shared aim to improve access to high-quality, specialised care and education services, particularly for children with severe and complex needs, so that they can receive the right support close to home.

### Supporting Data

2.19 Following the CYPE Cabinet Committee in May 2024 where the proposal for the consultation was discussed, further work continued on the rationale for the proposed changes informed by themes raised by Members and participants in the consultation. This section will review supplementary data that has been gathered since presenting to CYPE Cabinet Committee on 16<sup>th</sup> May 2024, which can be found in appendix 1. This analysis highlights the many ways that KCC’s practice and planning for special school placements has deviated from national and statistical neighbour norms in recent years.

2.20 Appendix 1, item 1 “Special School Rate, Kent at National Average”, concentrates on the percentage of pupils living within a district or area who are placed in a special school (state funded and private/independent) taking into account the deprivation level (using the Income Deprivation Affecting Children Index (IDACI)). Nationally, deprivation has been linked to the prevalence of SEND and is used as a key measure in the distribution of High Needs Funding between Local Authorities. Chart 1 shows that Kent overall and in each of its districts has a higher percentage of pupils in a special school in comparison to the national average. Overall, Kent recorded 2.3% of the population in special schools, while the percentage for England was 1.6%. The percentage for Kent’s nearest Local Authority neighbours is shown below in table 1 which also clearly shows Kent as an outlier.

Table 1. The percentage for other Local Authorities.

<b>Local Authority</b>	<b>Special School Rate Population</b>
<b>Kent</b>	<b>2.3%</b>
Nottinghamshire	1.0%
West Northamptonshire	1.5%
Essex	1.4%
Suffolk	1.3%
Lancashire	1.7%
East Sussex	1.8%
Swindon	1.8%

Staffordshire	2.0%
Warwickshire	1.7%
Worcestershire	1.9%

2.21 Item 1, chart 2 shows the percentage of pupils in a special school taking into account the deprivation level (using the Income Deprivation Affecting Children Index (IDACI)) at an area level. This illustrates that East and South have the highest percentage of children who live in that area placed in a special school out of the four areas, which may be expected due to their higher IDACI rating. North and West can be seen to have a lower percentage of population in a special school however as West has the lowest IDACI score out of all the areas of Kent this would be expected to result in the area having the lowest percentage of the population in a special school, which is not the case.

2.22 Appendix 1, Item 2, displays the current special school rate by both district in chart 1, and at an area level in chart 2. Both charts and table 1 in item 2, show the necessary adjustment required for these districts and areas to reach in order to come in line with the national average of pupils in a special school. These charts take into account the local variability observed across the county's districts based on deprivation levels. This data is using the percentage of the child population who are resident in that area, have an EHCP and are placed in a special school (not necessarily in that area or state funded). Table 1, column 3 titled "Adjusted for Kent to be at National Average" shows if KCC are planning for local provision for local children and are planning for the percentage of children that you would expect to provide for nationally, then the percentage of the child population once adjusted according to the demographic profile of that area would be as set out. This shows that East and West are the areas which are most out of kilter according to the national average.

2.23 KCC's use of special school placements as shown in appendix 1 item 3 "2024 EHCP England vs. Kent" shows that when comparing the distribution of EHCP placements, KCC places proportionally more children and young people in special schools and fewer in mainstream settings, compared with national averages. Specifically, 41% of Kent's pupils with EHCPs are placed in a special school (either state-funded or private), compared to 32% nationally. In contrast, 35% of KCC's pupils with EHCPs are placed in mainstream schools, which is lower than the national average of 43%.

2.24 In further support of this proposed change there has been an update to the data available for the High Needs Funding budget since the last report was presented on 16th May 2024, which can be viewed in appendix 1, items 4 and 5. It highlights the disparity in the allocation of High Needs Funding relative to the number of pupils with EHCPs across different types of educational settings.

2.25 State funded special schools, for example, receive 45% of the High Needs Funding budget ("**HNFB**") while they account for 32% of the EHCP pupil population. Private independent settings receive 23% of the HNFB and account for 9%. Mainstream schools, which support a similar number of EHCP pupils at 32% receive 14% of the HNFB. If special schools are catering for pupils with more or the most complex needs, then it is reasonable that the costs will be higher, however the current position in Kent is that a disproportionately high

level of the resources are distributed to the specialist sector. This inequity in funding distribution highlights the need for a reassessment to ensure a more balanced and equitable allocation of resources across educational settings.

- 2.26 Appendix 1 item 6 “Kent Special School Pupils”, is an overview of the Kent special school landscape, showing which districts, special school pupils are attending based on their primary need. This reflects where the special schools are and their designation. It highlights the inequity of provision across the county and shows where several districts have gaps in provision.
- 2.27 Appendix 1, item 7 “2024 EHCP England vs Kent vs District” shows that a particularly high percentage of children and young people with EHCPs are placed in special and private schools across all Kent districts. The average percentage of these placements in Kent is 40.5%, significantly higher than the national average of 32.1%. Maidstone records the highest proportion, with 50% of its EHCP pupils in special schools, while Dover, at 34%, reports the lowest rate, still above the national average. These figures illustrate a broader challenge in Kent, where there is a greater reliance on special and private schools to meet the needs of children and young people with EHCPs, further straining financial constraints.
- 2.28 This disparity between districts highlights the impact of differences in management, administration and culture which have created inequities for children and families within Kent’s special school system as well as adding challenge to KCC’s role as commissioner of school places. There are clearly districts with disproportionately high special school usage, and more inclusive education districts which would be well placed to take more of a leadership role, through the sharing of existing effective practice, to ensure more equitable distribution of placements and resources across Kent.
- 2.29 When considering the distribution of EHCPs by need type as shown in appendix 1 item 8 “2024 SEND Pupils England vs Kent”, Kent has proportionally more pupils with an EHCP for Autism Spectrum Disorder (“**ASD**”). In 2024, 46% of Kent’s pupils with EHCPs were diagnosed with ASD, compared to the national average of 33%.

#### Analysis of Other Local Authorities

- 2.30 The designation of special schools is not prescribed, although the SEND Code of Practice identifies four broad areas of need and support, namely: (i) communication and interaction; (ii) cognition and learning; (iii) SEMH; and (iv) sensory and/or physical needs. There is variation across Local Authorities in England in how their special schools provision is organised. Outside of Kent, special schools are often designated for the following type of SEND provision: (i) severe/profound learning disabilities (SLD/PMLD); (ii) for SEMH needs; and (iii) for ‘complex’ needs, which are typically schools that used to be for pupils with moderate learning difficulties (“**MLD**”) and have widened their range. The changes to particular school designations being considered by KCC are intended to ensure that special schools in Kent are organised in a way which is appropriate to meet the needs of children and young people with SEN in our area.

2.31 In some Local Authorities, there is a further degree of specialism, particularly for pupils with autism. This is a more recent development with Local Authorities keen to strengthen their local options as an alternative to higher cost placements in the private non-maintained sector. However, with increasing levels of diagnosis, there is recognition that all types of provision, including mainstream schools need to be able to provide suitable education for children who are neurodiverse and may have a diagnosis of autism. The trend in state-funded special schools has been towards more generic local provision, reducing the distances that pupils have to travel and avoiding unnecessary residential costs. Special schools for pupils with physical disabilities or sensory impairments (visual and hearing) are now relatively rare. This is connected to shifting attitudes and legislation regarding the rights of disabled people. As a result, education for children and young people with disabilities must be developed with accessibility and reasonable adjustments planned across the education sector. The curriculum available to children and young people with disabilities must be as comprehensive as that provided to their peers without disabilities. This offer also needs to be consistent for all pupils with disabilities, rather than limited to a small number of settings. In other Local Authorities, this has led to parents and carers expressing a preference for their child or young person to attend a mainstream school, with the same as opportunities to access the breadth of curriculum and activities as all children and young people within a local area.

### Engagement Events

2.32 Throughout the consultation period, KCC Officers actively engaged with the full spectrum of stakeholders to discuss and gather feedback on the proposed changes. This involved attendance at several professional and public events. Two face-to-face events were held specifically for special school Headteachers and Chairs of Governors, with some Headteachers attending both sessions. Additionally, four online events were conducted for mainstream Headteachers. Parent and carer engagement was also a priority, with five online events held, attracting over 200 participants in total, which were promoted through the Kent PACT networks. Three focus groups were organised with students from special schools as part of the Kent Young People's Voice Project. These groups were facilitated by Assistant Educational Psychologists ("AEPs") and involved students from schools representing different quadrants of Kent, particularly those with proposed changes to their designation or admission guidance. A cross section of seven specialist schools were also invited to participate in the Kent Young People's Voice Project. One online event was held for other Local Authorities, to identify further opportunities to strengthen proposals.

## **3. Public Consultation Overview**

3.1 The public Consultation was conducted from 19 June to 14 August 2024 and included a two-week extension due to a change in the recorded designation for Valence School.

3.2 The evidence detailed above and in Appendix 1 shows we are not achieving our duties in relation to the planning of special school placements as effectively as we could be. The results of the Consultation are being used to inform the investment of resources, for example in greater parental engagement, to address issues and misunderstandings, as well as to build confidence in KCC's commissioning intentions going forward.

3.3 The Consultation received 1,351 responses, which is considered a high response rate reflecting the role that special schools play within the SEND sector. The majority of respondents, 86%, identified as parents or carers of children in education. Just over two thirds of respondents, 68% had a child with SEND and an EHCP who are educated in Kent, while 18% had a child with SEND but who do not have an EHCP. Responses on behalf of special schools accounted for 10%, while responses on behalf of mainstream schools accounted for 4%.

3.4 The strong response from the special school community highlights the high level of interest in the consultation, which is to be expected as special school Headteachers have been a key stakeholder throughout the review. The active involvement of special school staff in raising awareness within their school communities supported the significant efforts undertaken in the Consultation to reach as broad an audience as possible.

### Consultation Questionnaire and Summary of main responses

3.5 The consultation questionnaire invited respondents' views across four topics:

- (i) a special school expectation statement for KCC;
- (ii) proposed changes to the designation and accompanying admission guidance of particular special schools in Kent;
- (iii) the proposed implementation of any such changes; and
- (iv) a proposed new school-to-school support model.

Appendix 2 contains a summary and analysis of feedback to the Consultation, which has been collated by an independent third-party company commissioned by KCC for that purpose.

3.6 Table 3 below shows the net agree and net disagree analysis of each proposal within the consultation.

Table 3. Public consultation results: net agree and net disagree.

Proposal	Net Agree	Net Disagree
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A proposed special school expectation statement for KCC.		50%	44%
Proposed changes to the designation (i.e. the type of SEN provision made at the school) and accompanying admission guidance for particular special schools in Kent.		18%	70%
Proposed implementation timescales of any such changes.		24%	61%
Proposed school-to-school support model.	Special schools supporting transition for children or young people (re)integrating into mainstream settings.	49%	40%
	Special schools designating specific days when mainstream colleagues are invited to visit, shadow special school staff and observe their practices.	62%	27%
	Mainstream settings being able to request a one-to-one consultation with lead teachers from special schools on specific aspects of education.	63%	26%
	Special schools proactively working with local FE colleges and other providers to improve adapted curriculum and access to specialist teaching facilities in the Post-16 sector.	68%	20%

3.7 A summary of the main response themes from each key stakeholder group consulted is also set out below.

3.8 Special school Headteachers expressed concerns during the consultation period:

- A primary issue was the suitability of buildings proposed for designation changes. Headteachers noted that, without necessary adaptations, these buildings were not fit for providing appropriate education to the children the Local Authority planned to place there. In some cases, there were concerns that even with adaptations, limitations such as planning restrictions could prevent the environment from becoming suitable for the intended pupils.
- Another concern raised was about the potential impact of admitting children with learning difficulties into C&I (Communication and Interaction) special schools. Headteachers argued that this would negatively affect the current cohort of children with complex needs, potentially leading to an



increase in demand for private school placements. This criticism was particularly focused on the proposal to introduce a new designation of "Neurodivergent with Learning Difficulties" for Kent special schools.

- Headteachers highlighted the need for clarity regarding the funding of a proposed "school-to-school" support model. Without a clear understanding of the financial framework, they found it challenging to engage in discussions about the potential role of special schools in supporting pupils with SEND in mainstream settings. KCC does not agree that additional funding is required for this support model. Some special schools are already supporting their local mainstream schools with the activities outlined in the consultation within their existing resources.

### 3.9 The parent and carer consultation sessions revealed:

- A general lack of confidence in mainstream schools' ability to meet the needs of children and young people with SEND.
- Concerns about the proposed removal of the designations for C&I needs and physical disabilities and complex medical needs, fearing that this could result in some children falling through the gaps in service provision.
- Parents and carers shared personal stories of their children's needs not being met and having placements in PSCN schools which had not been successful prior to being placed in the C&I special school Stone Bay.
- There was a widespread misconception around the possibility that children currently enrolled in special schools might be removed if proposed changes to the designation of particular special schools were implemented. In each session, Local Authority Officers reassured attendees that no child currently in a special school would lose their placement as a result of the proposals.
- Parent's and carers were keen to have a continued open dialogue with Local Authority Officers in relationship to the special school sector going forward.

### 3.10 Officers also engaged with students:

- Some students who participated in Kent Young People's Voice Project felt that those with severe and complex needs should be prioritised for specialist provision. Others recognised the importance of considering individual needs and abilities in deciding whether a mainstream setting might be appropriate.
- Students responded positively to the proposed "school-to-school" support model, welcoming the idea of improving mainstream schools' understanding of special school practices as a way to bridge the gap between the two.
- They also appreciated the opportunity to share their views directly with KCC and expressed a desire for this to continue.
- Students implied the need for greater information on their futures from KCC but also from individual colleges and settings. The implication being that both the student as well as their families 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.

Responses to these concerns are addressed below and in greater detail in KCC's Formal Response to the Public Consultation. This follows a "you said, we did" style query and response format which details how each feedback point informed the development of proposals on their path to this paper. This document is included as appendix 3.

#### **4. KCC response to the Public Consultation**

- 4.1 KCC's formal response to the consultation which can be viewed in appendix 3.
- 4.2 A predominant concern raised in relation to the planning of special school places being focussed on children and young people with severe and complex needs was the fear that the strategy proposed fails to take into account children and young people with lower-level needs. Respondents emphasised the importance of ensuring that all children and young people receive a suitable education and expressed doubts about the capacity of mainstream schools to adequately support children with special educational needs and disabilities.
- 4.3 There is clear evidence that many mainstream schools in Kent are already successful in achieving this outcome. Further, in response to this concern, KCC is working to ensure that all children and young people with SEND, across all levels of need, are being carefully planned for supported by practitioners who are sharing information on existing effective practice between schools, an approach which will be further strengthened by the Communities of Schools Model.
- 4.4 A key focus of the Special School Review is to ensure KCC plans special school places for children and young people with severe and complex needs, which cannot be met in mainstream provision, for them to have access to suitable education as close to their community as possible. This aligns with the Government's direction of travel<sup>6</sup> which aims to take a community-wide approach, improving inclusivity and expertise in mainstream schools, as well as ensuring special schools cater to those with the most complex needs. This KCC review has considered strategic guidance set out in the SEND Code of Practice<sup>7</sup> which cites commitments around inclusive education and the removal of barriers preventing children and young people with SEND from learning and participation in mainstream education.
- 4.5 In addition, KCC is strategically planning for the continuum of special educational needs by setting out the provision expected across all school

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<sup>6</sup> SEND and Alternative Provision Improvement Plan [SEND and alternative provision improvement plan - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/611111/SEND_and_alternative_provision_improvement_plan_-_GOV.UK.pdf)

<sup>7</sup> [SEND Code of Practice January 2015.pdf \(publishing.service.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/611111/SEND_and_alternative_provision_improvement_plan_-_GOV.UK.pdf)

sectors to ensure children and young people have access to suitable education in or near their local community, building on the existing good practice in schools. This is part of the broader SEND system transformation programme and KCC is working with stakeholders across the Kent education sector to identify a shared understanding regarding the levels of need and corresponding expectations across all educational settings whilst being mindful of the resources available.

### Special School Designations and Admissions Guidance

- 4.6 Feedback received in relation to the designation, admission guidance and implementation proposals set out in the Consultation understandably reflected strong feelings and emotion among the parent and carer community. The consultation feedback highlighted concerns that the proposed changes could adversely affect children and young people with SEND and changes might cause distress. It should be noted that some feedback was based on misconceptions, such as fears that pupils currently in special school placements would be moved to mainstream schools. To clarify, KCC has not proposed relocating children or young people currently placed in special schools as part of any proposed changes. If the proposed changes to the designation and accompanying admission guidance for particular special schools are adopted in due course, they would apply to children and young people entering a special school placement from September 2026 onwards. The changes would be introduced incrementally, year on year. Children already enrolled in special schools will continue to attend their current schools, with the process for their continued attendance remaining unchanged. Their needs and the suitability of their school placement will continue to be reviewed and considered through the annual review of their EHCP, as it does now.
- 4.7 KCC and NHS England have recognised the necessity for a new approach to early intervention for children and young people who are neurodivergent in mainstream schools. KCC, NHS England and Kent Pact are all part of the national DfE funded programme, Partnerships for Inclusion of Neurodiversity in Schools (“PINS”). Learning will be taken from that programme and will be applied more widely across Kent’s education sector in the future. KCC recognises that many respondents to the Consultation lack confidence that children and young people with neurodiverse needs can thrive or have their needs met in a mainstream school. To address this, we are working with NHS England, Headteachers and Kent PACT to shape the future provisions for these children and young people in mainstream schools. These changes would be put in place at least a year before any changes were to be made to the type of SEN provided at any special school.
- 4.8 Feedback to the Consultation regarding the proposed change from KCC having five designations of special schools to three revealed a lack of confidence in the ability of mainstream schools to adequately support children and young people with SEND. A key theme emerged around fear, anxiety, and mistrust in mainstream schools' capacity to meet the needs of SEND students. KCC recognises that this is an emotive issue, and responses have been influenced by individual, personal experiences. Alongside this there is a widespread misconception that mainstream schools are unable to effectively support children with SEND which has led to diminished confidence in the

mainstream school sector. KCC acknowledges that there is currently variability in the offer at mainstream schools and the capacity of schools to provide for children and young people with SEN. This has led to geographical variations and inconsistent pathways for children and young people with SEN. However, it is important to note that many mainstream schools in Kent are successfully supporting SEN students. Kent's proposed continuum of need and communities of schools initiatives will ensure that this best practice is shared and a more consistent mainstream offer will be made available, building on the existing Mainstream Core Standards. Additionally, other Local Authorities have effectively included children and young people with a wider range of SEND in mainstream schools, with these children being considered part of the local community. With the right support, mainstream schools can and do meet the needs of SEND pupils effectively. Work on developing Kent's mainstream school capacity in SEND inclusion has been proactively taking place since 2020 and it is continuing.

- 4.9 Proposed changes to particular special schools' designation and accompanying admission guidance are intended to improve accessibility to support for children and young people across the county. This will be achieved by planning special school places for children and young people within or as near to their local communities as possible, enabling them equitable access to resources, the breadth of mainstream curriculum, and facilities. It also fosters local friendships with peers which supports their independence in adulthood. Local placements in special schools reduce significant travel time minimising the amount of time that children and young people with SEND spend travelling to and from school.

*Proposed designation change from 'physical disabilities and/or complex medical needs' to PSCN*

- 4.10 While children and young people across the county have physical disabilities and complex medical needs, there is currently only one special school in Kent, Valence School, catering to children and young people with those needs. This limits access to specialist support for many preventing a significant number of children and young people from attending the school. At the same time, other schools refuse to accept children or young people for whom KCC considers they could adequately provide an education, citing the availability of Valence School as a specialist school for physical disabilities and complex medical needs. Children and young people that have been precluded from accessing this one school have instead had their needs met in PSCN schools closer to where they live. Across the county there are children and young people with physical disabilities and complex medical needs in all PSCN schools. KCC considers that children and young people with disabilities and complex medical needs should be able to go to their local school and that school should have the skills and expertise needed to meet their needs.
- 4.11 Current data indicates that no students with physical disabilities from Canterbury, Thanet, Dover, Folkestone or Hythe districts attend Valence School. Instead, their needs are being met in local mainstream schools, SRPs, or other local special schools, a trend that has persisted for some time. Additionally, very few local authorities now operate their own special schools for physical disabilities as needs can be met in either mainstream provision,

SRPs, or local PSCN special schools. This inconsistent offer across Kent highlights that the current model neither works effectively, nor supports the need for specialist PSCN provision.

4.12 In collaboration with NHS Kent and Medway, KCC has reviewed special school nursing service data. Currently, the nursing service is commissioned exclusively for schools catering to pupils with PSCN. However, some special schools in Kent independently purchase this service, while others have their own bespoke arrangements. Due to this, some schools' data is not yet accessible to KCC. KCC's Officers are actively working to obtain this information, but the data available, as shown in Appendix 1, item 9 provides a partial view of the situation. Despite these limitations, the data indicates that children and young people with complex health needs are successfully having their needs met in various PSCN special schools across Kent. It further demonstrates that these schools are equipped to provide suitable education for pupils with similar health needs.

4.13 KCC has invested in supporting children and young people with physical disabilities across all schools through their Specialist Teaching and Learning Service for sensory and physical disabilities. KCC is consulting on the future of school-commissioned Specialist Teaching Learning Service, and the physical disabilities, Visual Impairment and Hearing Impairment Teams are now managed by KCC. There is expertise across the entire special school system in relation to physical disabilities and complex medical needs. We are working with NHS Commissioners to ensure future commissioning ensures equity of access for children and young people with disabilities wherever they live in Kent. The intention of broadening this designation is that all children and young people with severe and complex special educational needs will be able to attend a school that is local or as near as possible to their local community.

4.14 Additionally, KCC is developing an Accessibility Strategy and School Access Initiative which has recently been subject to consultation<sup>8</sup>. The Accessibility Strategy sets out how KCC and its maintained schools currently ensure education is accessible for pupils with SEND. It also sets out the steps KCC plans to take to increase access to the school curriculum, how it will improve the physical environment so that accessibility is not a barrier to disabled pupils or those with SEND, and how it will improve the delivery of information to disabled pupils which is readily available to those who are not disabled. The School Access Initiative is a capital funding stream which will enable KCC to improve the physical accessibility of those maintained mainstream schools for which it has capital responsibility (community, foundation and voluntary controlled schools).

4.15 Concerns raised in response to the Consultation that the proposed changes to schools' SEND designations would result in specialisms being diluted does not acknowledge that teaching staff at special schools have valuable expertise in curriculum adaptation and monitoring the progress of children and young people with SEND. Their key areas of expertise include how to adapt the curriculum, assess individual needs, and monitor progress. KCC proposals expect special schools to work together, to develop their

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<sup>8</sup> [Education Accessibility Strategy | Let's talk Kent](#)

knowledge and skills on specific interventions they may or may not have experience of previously. By doing this, they can gain knowledge about specific interventions, as their skills in curriculum adaptation are generally transferable to different groups of children and young people. A team of experienced educationalists has been put in place as a resource for Special School leaders to access for support as needed through the change process.

#### Proposed designation changes for C&I schools

- 4.16 The current admission guidance for C&I schools excludes those who are not attaining within two years of their chronological age. This has resulted in cases whereby some children or young people are placed in special schools and attaining within their expected age range, when KCC considers they could receive suitable education alongside their peers in mainstream schools (adapted as necessary). Meanwhile, other children and young people with severe and complex special educational needs who require an adapted curriculum beyond which can be provided at a mainstream school are unable to access a state funded special school placement if those schools are full. As a result, they have been placed in a mainstream school or a non-maintained private special school, contributing to the increasing use of this provision. These pupils must be considered when weighing the impact of the proposed designations changes, as they being failed by the current system and will directly benefit from the recalibration how existing provision is used.
- 4.17 One Academy Trust suggested that KCC's proposed changes to the designation and accompanying admissions guidance for some special schools may be discriminating against young people with SEND who are studying for GCSEs. KCC does not consider that our proposals discriminate against children and young people with SEN who are studying for GCSEs, as young people with an EHCP will be able to appropriately do so in suitable mainstream and SRP settings, with specialist support and adaptations as necessary. This will allow planning for special school placements for children and young people with severe and complex needs, who are not able to follow a mainstream curriculum. Findings from the Special School Review indicate that historical planning has resulted in inconsistencies in eligibility for a special school place influenced by a child or young person's home location and the availability of access to schools with particular designations. This disparity particularly affects children and young people placed in C&I special schools where admission guidance specifically requires that children are achieving within the range expected for their age or within two years of their chronological age. The education and curriculum on offer at these schools is aligned with a mainstream curriculum offer, delivered by subject teachers whose experience is mainstream subject teaching. KCC considers that, with the right support and/or adaptations in a mainstream setting or an SRP, this cohort of children and young people with SEN could have their special educational needs suitably met outside of a special school setting.
- 4.18 KCC acknowledges that due to historic established custom and practices, the proposed changes in KCC's planning for mainstream schools, SRPs, and special school provision may feel significant, particularly where there has been an expectation and desire for special schools to support students with lower levels of SEN, including what has been described as 'high

functioning autism'. In some cases, the experience that parents and children have had in the past of education in mainstream schools has been variable. KCC acknowledges that attitudes and approaches to inclusion of children and young people with SEND in mainstream schools has been inconsistent.

- 4.19 Accordingly, during the academic year 2023/24 Headteachers of mainstream schools were invited to sessions led by a mainstream senior school leader, working in partnership with KCC, to establish the range of needs for which mainstream schools currently provide education. This learning will inform the development of a different approach to meeting children's needs through a continuum of provision and a commitment to local collective responsibility for children with SEND, within the financial resources available. As part of this ongoing process, scheduled to conclude in spring 2025, KCC has so far identified considerable variation in how schools interpret and define levels of SEND. Most schools involved in the review had differing perspectives on what constitutes a severe or complex special educational need. Therefore, KCC, in collaboration with schools across mainstream, SRP, and special school sectors, has shifted its focus to curriculum adaptation levels at each provision type, assessing whether each provision type can efficiently support an adapted curriculum.
- 4.20 It became apparent during the meetings between Local Authority officers and schools that all mainstream schools are providing education for children with autism. Many mainstream schools are providing education for children whose learning is significantly more delayed than the two-year gap currently specified for the admission of children to some special schools. These mainstream schools are providing suitable education effectively, making an efficient use of the resources available, and enabling students to make progress towards adulthood with peers in their local community.
- 4.21 For most children and young people studying for GCSEs who may experience high levels of anxiety or need an adapted curriculum, KCC expects that these needs should be met within mainstream schools or SRPs, where they can be. KCC acknowledges that this has not consistently been the case, and the recent SRP review has highlighted gaps in this area, including a lack of secondary SRP pathways in at least three Kent districts for students with autism. To address this, KCC plans to establish improved SRP primary to secondary pathways, in addition to changes to ensure that mainstream settings are more inclusive, that would be operational before any proposed changes to designations of special schools in Kent are made.
- 4.22 In particular, concerns raised regarding the provision for children and young people that are neurodivergent and/or autistic highlights the need for a cohesive strategy that integrates KCC's initiatives with existing NHS provisions. In response to feedback from the Consultation, KCC has initiated this work and is committed to developing a clear, consistent neurodevelopmental pathway. This will ensure that families understand the resources and support available. KCC recognises the importance of formalising its approach to providing a continuum of provision, and how children will be supported in gaining independence in adulthood. This will build on the work of the Autism Education Trust. KCC is now working in partnership with our health colleagues to collaboratively create a strategy.

4.23 The consultation also highlighted a lack of confidence among parents and carers of children and young people with autism regarding the SEND system. In response, KCC recognises the importance of establishing a consistent framework for engaging with this group of parents and carers. KCC will involve them in our proposed developments and demonstrate how their feedback is incorporated into KCC's planning. This will be achieved by working with Kent PACT and special schools to establish a Special School Parent Advisory Group which will consist of parent/carer members from each special school. It is proposed that the group will meet by area in person, with KCC Officers. This will ensure there is direct, open and transparent communication between parents and carers at special schools and KCC in relation to the strategic development and planning of special school places. Work is already underway to set up this group, with the first meeting being planned for early 2025. In addition to this an established and regular Special School Young Person Focus Group is being developed by KCC's Assistant Educational Psychologist Team to build on focus groups held for young people at Kent's special schools as part of the review. This is in response to their desire to continue and embed this open dialogue with KCC. This will allow them to have direct feedback and share their views on the special school sector.

#### *Proposed School-to-School Support Model*

4.24 The main concern raised in relation to the proposed school-to-school model was in relation to a lack of school staff resources and current funding acting as a barrier to support being provided across the settings. The Consultation outlined approaches currently being used in several Kent special schools to support their local mainstream schools through effective knowledge sharing and support strategies. These regular practices have been proactively integrated into their work and are delivered within their current budget constraints. The response from both the special and mainstream schools participating in this has been positive. This indicates that a similar model will work at scale across Kent, without generating a significant resource or funding challenge.

## **5. Proposed Next Steps**

5.1 Following analysis of the feedback to the Consultation, it is recommended that KCC proceed with the proposals and move to the next stage of the decision-making process for changes to the SEND designation and accompanying admissions guidance for particular special schools in Kent.

5.2 In doing so, KCC considers that the proposed changes and identified additional areas of work effectively address the challenges raised by consultees. An options analysis below indicates that no preferable alternatives have been identified during the extensive engagement process undertaken in the development of proposals prior to, or during, the Consultation period.



5.3 It is proposed that a phased approach be taken to KCC’s decision-making in relation to proposed changes to the SEND designation and accompanying admissions guidance of particular special schools in Kent. This paper outlines the proposed changes as part of phase 1.

5.4 As we have outlined throughout, KCC’s overarching proposal is to move to three special school designations (as shown below in Table 4) rather than the current five special school designations. However, KCC considers that it cannot take a final decision on the list of designations prior to further public engagement being completed as part of the statutory procedure for changing the type of SEN provision made at particular maintained schools.

Table 4. Special school designation and accompanying admission guidance

<b>Complex Learning Needs: Profound, Severe, Complex Needs</b>	<b>Social, Emotional, Mental Health Needs</b>	<b>Neurodivergent with Learning Difficulties</b>
Learners have a range of needs including profound, multiple learning difficulties, severe learning difficulties, and may have autism spectrum condition, communication disorders and associated dysregulated behaviours	Pupils have social, emotional and mental health difficulties with associated challenging behaviour, many have had adverse childhood experiences and/or have additional needs, which may include autistic spectrum condition, speech, language and communication difficulties, ADHD and other related conditions	Pupils have complex special educational needs, they are neurodivergent and may have a diagnosis of autism, ADHD or other conditions. The pupils have severe social communication difficulties, learning difficulties and may have social, emotional mental health needs associated with neurodiversity, including severe social anxiety. And/or dysregulated behaviours

Phase one

*Proposed designation change*

5.5 Using the three designations above would require changes to be made to the current designation of 5 maintained special schools, and 2 special Academies, in Kent.

5.6 Before final decisions can be made whether or not to change the designations (i.e. the type of SEN provision) of maintained special schools, KCC will need to publish proposals in a statutory notice, and follow the steps required by the statutory prescribed alteration procedure. These public notices will specify the alterations proposed for individual schools through the authority delegated to the Director of Education and SEND.

5.7 In relation to special school Academies, KCC does not have any power to make changes to the type of SEN provision provided. For these schools to undergo a change in designation (i.e. a change in the type of SEN provision made at the Academy), the relevant Academy Trust would need to apply to the Secretary of State to approve the proposed changes under the 'significant change' mechanism which applies to academies. The initial step required by phase one will be for KCC to request that the relevant Academy Trust make such an application to the Secretary of State and support them to do so.

5.8 The five maintained special schools affected by the prescribed alteration process are; Broomhill Bank; Grange Park School; Laleham Gap School; Stone Bay School; and Valence School. The changes proposed to these schools are shown below in table 5.

Table 5. Change proposed for maintained special schools

School Name	Current Designation	Proposed Designation
Broomhill Bank School	Communication and Interaction	Neurodivergent and Learning Difficulties
Grange Park School	Communication and Interaction	Neurodivergent and Learning Difficulties
Laleham Gap School	Communication and Interaction	Neurodivergent and Learning Difficulties
The current designation of Communication and Interaction no longer adequately meets the needs of children and young people across the county. For families whose children need a specialist education beyond that which a mainstream school and/or SRP can reasonably provide, the existing designation and admission guidance can result in inequitable access. The proposed designation change aligns with ongoing collaboration between KCC and health partners to address diagnostic delays, which have prevented those children and young people who are awaiting a diagnosis of autism to access a placement.		
Stone Bay School	Communication and Interaction with Severe Learning Difficulties	Profound, Severe and Complex Needs
There is a singular special school with this designation and the location acts as a barrier for some children and young people accessing a placement. The children who are placed at this school have similar needs to those at other PSCN schools, and the proposed change would bring the school in line with the same designation and admissions guidance as those schools, supporting greater consistency in designations across the county.		
Valence School	Physical Disabilities and Complex Medical Needs	Profound, Severe and Complex Needs
There is a singular special school with this designation, and the location acts as a barrier for some children and young people accessing a placement. Pupils who have been unable to access this school have had their needs met at PSCN		

schools in their local areas. KCC aims to enable children with physical disabilities and complex needs to attend local schools with appropriate support.

5.9 A part of the prescribed alteration process, a formal consultation and representation period will run for 4 weeks following publication of the statutory notice. Any representations and/or objections received will be considered by KCC before a final decision is taken on whether to proceed with the changes in the type of special educational needs for which the school is organised to make provision. If the changes are adopted, then the accompanying admissions guidance for the schools will also be amended to reflect the change.

5.10 In relation to special Academies, the affected schools are Snowfields Academy (Leigh Academies Trust) and Aspire (Bourne Alliance Multi Academy Trust). Table 6 below indicates the change in the designation (i.e. type of SEN provision made at the special Academy) of these special schools which KCC proposes to request be made by an Academy Trust (via an application to the Secretary of State).

Table 6. Changes KCC proposes requesting that Academy Trust' s make

School Name	Current Designation	Proposed Designation
Aspire	Communication and Interaction	Neurodivergent and Learning Difficulties
Snowfields Academy	Communication and Interaction	Neurodivergent and Learning Difficulties
This current designation no longer adequately meets the needs of children and young people across the county. For families whose children need a specialist education beyond that which a mainstream school and/or SRP can reasonably provide, the existing designation and admission guidance can result in inequitable access. The proposed designation change aligns with ongoing collaboration between KCC and health partners to address diagnostic delays, which have prevented some children and young people awaiting a diagnosis of autism to access a placement.		

5.11 KCC will support any such application made by the applicable Academy Trust. If the Academy Trusts agree, the steps in the applicable significant change process for academies will be followed, and a decision will be taken by the Secretary of State for Education. If the change is approved, KCC will also request that the Academy Trusts amend their accompanying admission guidance for these special Academies to reflect the change in type of SEN designation.

5.12 It is important to note that if decisions are made to proceed with the prescribed alterations for the maintained special schools and/or if the Secretary of State approves the changes in designation to special Academies, KCC (and/or Academy Trusts) would amend the applicable admission guidance to align with those decisions at a later stage. This progression towards updating the admission guidance for the seven special schools proposed to undergo a designation change is dependent on the outcomes of these initial decisions.

### *Proposed school-to-school model of support*

- 5.13 KCC will introduce a school-to-school model of support between special and mainstream schools in their local communities. This model will align with the national school-to-school framework and the localities model which will enable mainstream schools to support more children and young people with special educational needs in their localities.
- 5.14 It is important to recognise that this practice is already occurring in Kent in some special schools within their current resources, which have been proactive in supporting their mainstream colleagues. This recommendation aims to build on these existing practices, ensuring that all mainstream schools have access to the specialist knowledge and skills of their special school counterparts, improving support for SEND children and young people across the continuum of provision.
- 5.15 Special schools will play a pivotal role in fostering collective responsibility for children and young people with SEND in their communities of schools. Schools will collaborate within local communities to address local support needs in a responsive manner. Existing working relationships will be strengthened and expanded through the establishment of community groups of schools.
- 5.16 The support model is expected to bring several key benefits that align with the national direction of collaborative education practices. Teachers in special and mainstream schools will regularly exchange knowledge and expertise, improving their understanding of resources, teaching methodologies, pastoral care, and behaviour management. This collaborative approach will foster a culture of mutual learning, enhancing the quality of education in both settings.
- 5.17 The support model's implementation will align with the national emphasis on school-to-school collaboration, demonstrating significant potential for improving practices and outcomes across both special and mainstream schools. It will include a consistent and integrated outreach offer, aligning with the whole system change led by the local Authority and NHS. For example, supporting Autism Education Trust standards and competency framework as the evidence informed approach to good autism practice in schools, drawing on the LA's published Local Offer

### Phase two

- 5.18 Phase two of the proposed changes is contingent on the approval of phase one, and decisions being taken in due course to make changes to the designation and accompanying admissions guidance of special schools in Kent.
- 5.19 When considering whether to make those changes at phase two of its decision-making process, KCC will also consider the further proposals which are set out below. These relate to:

- 5.19.1 The existing admissions guidance for special schools in Kent for which their SEND designation would remain at present, namely Goldwyn and Portal House (which are both SEMH schools that currently have different admissions guidance to other SEMH schools in Kent); and
- 5.19.2 The review of KCC's special school capital programme.

## **6. Other options considered**

### Alternative option: Retain the current special school model.

7.1 This was discounted as it would risk perpetuating inequalities in access to state-funded special school placements, continue barriers for some children and young people with SEND in accessing appropriate support, and ongoing financial challenges due to reliance on costly-out of county and private school placements. The status quo would continue to prevent some children with the most severe and complex state-funded special educational needs, including those with dysregulated behaviours, in accessing special school places. It would also hinder progress toward Kent's strategic goals of inclusion and improved outcomes for children and young people.

7.2 Further, there appears to be little challenge to the principle that KCC cannot continue to deliver SEN support in the same manner that it has in recent years. There also appears to be broad agreement that KCC's historic decision-making around issuing EHCPs and usage of maintained special school and private special school provision is at odds with national norms.

7.3 The consequence of a further delay in taking action to address the above would be to postpone the plans for a fully functioning continuum of educational provision so that types of schools have complementary admissions criteria. This in turn would negatively impact learning and development opportunities for children to be suitably educated alongside their peers, creating future challenges and potentially limiting life choices as they transition into everyday life at the end of their education.

7.4 The Special School Review forms one part of a suite of changes to support the delivery of reducing our spending on High Needs to bring us in line with the funding provided by Government to pay for these services. This is mainly expected to be achieved through reducing our reliance on private and non-maintained special school places. Any delay therefore also increases the risk of KCC not staying on target with reducing High Needs spend and this places the remaining c£60m of Safety Valve funding in serious jeopardy.

## **7. Financial Implications**

8.1 The Council is responsible for both the setting and payment of the Special Schools budgets. Funding for special schools is provided by the Department of Education through the High Needs Block of Dedicated Schools Grant. In 2023- 24, Kent spent approximately £152m on special school places. This is the largest expense in the High Needs block, accounting for just over 40% of total spend. This includes approximately £9m on exceptional pupil need (additional funding requests outside the standard funding rates).

8.2 The decisions at this stage of the review, relating to proposed changes in the designation of special schools are not expected to have a significant revenue cost of implementation for the Council. Costs are expected to be limited to professional expertise in supporting any implementation process, with additional School Improvement expertise commissioned to work with schools to deliver any changes required. Whilst designation changes would be introduced in line with the statutory process, they will only apply to new students being admitted to the school, in line the new intake of students each year, therefore enabling affected schools time to identify and plan for sufficient resources, staff & training, including sharing of knowledge with other similar special schools where applicable. This would minimise additional costs and enable changes to be embedded gradually. If it is identified, specific additional revenue costs would be incurred to deliver the changes required, above that would normally be expected to be met from their school budget, these costs would need to be met from within the overall High Needs Budget. An initial one-off budget of £0.5m will be set aside to support associated implementation costs.

8.3 The capital costs and phasing associated with making the physical changes in our special schools to successfully implement the proposals are being established. These will be identified prior to issuing public notices to ensure these statutory consultations are adequately informed and that the funding source for these is identified. This work includes specifying the alterations or additions required to the schools, and determining what consents may be required to implement these.

8.4 The proposed new funding model for special schools is outside the scope of this paper, however the proposed tariff model is intended to support schools by ensuring funding rates are graduated to take account of the extent to which the curriculum is adapted for children and young people with special educational needs. This will cover both day and residential placements. 7.5 Whilst the initial assessment of the revenue costs of implementing proposed designation changes is expected to be relatively low (see paragraph 5.2), the resulting financial impact of ensuring our special schools are equipped to support children with the most complex needs, through the delivery of more local school places, is expected to have significant financial benefit on both the Dedicated Schools Grant High Needs Block and the Council's General Fund, along with improving outcomes for children more widely. These proposals will underpin the wider ambition to enable more children to be supported in their mainstream school by aligning the admission guidance for Special Schools with the aims of the wider SEN strategy, and therefore, enabling Kent to return to the national average number of special school places with the majority of the children supported in a state-funded school, with only the most specialist placements to be commissioned in the private sector.

## **8. Legal implications**

### *(1) Sufficiency Duties*

KCC is under a statutory duty to contribute towards the spiritual, moral, mental and physical development of the community by securing that efficient primary education and secondary education are available to meet the needs of the population of their

area: section 13 of the Education Act 1996 (“the 1996 Act”). KCC must ensure that its education functions are exercised by the authority with a view to promoting high standards, ensuring fair access to opportunity for education and training, and promoting the fulfilment of learning potential by every person under the age of 20 and those over the age of 20 and for whom an EHC Plan is maintained: section 13A. By section 14, KCC must secure that sufficient schools for providing primary and secondary education are available for their area, defined as being sufficient in number, character and equipment to provide for all pupils the opportunity of appropriate education.

Under section 27 of the Children and Families Act 2014 (“the 2014 Act”), KCC is under a duty to keep under review the educational provision, training provision and social care provision made in its area (and outside it) for children and young people who have special educational needs or a disability. KCC must consider the extent to which its provision is sufficient to meet the educational needs, training needs and social care needs of the children and young people concerned.

### *(2) Part 3 of the Children and Families Act 2014*

If an EHC needs assessment identifies that is necessary for SEN provision to be made for a child or young person, KCC is required to secure an EHCP for the child or young person and maintain that plan. An EHCP must, amongst other things, specify the child’s or young person’s special educational needs, the outcomes sought for him or her, and the special education required by him or her. A parent or young person has the right to request the authority to secure that a particular school or other institution is named in the Plan.

Section 42 of the 2014 Act requires KCC to secure the SEN provision specified in an EHCP. Under section 43 of the 2014 Act, a school or other institution named in an EHCP is under a duty to admit the child or young person concerned.

When deciding which school or institution to name in an EHCP, the parent of a child with an EHCP has a right to request that a particular school or institution be specified in the EHCP. If no particular school or institution is requested by the parent of the child concerned, KCC must secure that the plan names a school or institution, or the type of school or institution, which it considers would be appropriate for the child concerned. KCC must secure that the EHCP provides for the child or young person to be educated in a mainstream setting unless that is incompatible with (a) the wishes of the child’s parent or the young person, or (b) the provision of efficient education for others.

However, if a particular school or institution is requested then KCC is required, under section 39, CFA 2014, to secure that the school or institution requested is named in the EHCP unless either of the factors in section 39(4), CFA 2014 applies, namely:

1. The school or institution requested is unsuitable for the age, ability, aptitude or special educational needs of the child or young person concerned; or
2. The attendance of the child or young person concerned at the requested school or institution would be incompatible with:
  - a. The provision of efficient education for others; or

- b. The efficient use of resources.

KCC must also have regard to the general principle in section 9 of the Education Act 1996, namely that pupils are to be educated in accordance with the wishes of their parents, so far as that is compatible with the provision of efficient instruction and training and the avoidance of unreasonable public expenditure.

A parent of a child with an EHCP may appeal to the First-tier Tribunal against matters including:

- a. The school or institution, or type of school or institution, named in an EHCP; and
- b. If no school or institution is named in an EHCP plan, that fact.

Upon a successful appeal, the First-tier Tribunal may direct changes to be made to an EHCP as necessary, including naming a different school in Section I of the Plan.

The changes which KCC is proposing to the designation of special schools are concerned with KCC's strategic placement planning duties. These proposals do not displace the statutory duties under the CFA 2014. KCC is still required to identify a child/young person's special educational needs, identify the SEN provision required, and secure that provision. Where a parent requests a particular school, KCC will be under a duty to give effect to that parental preference unless one of the exceptions in section 39(4) is made out.

Every child will continue to have their needs met if the recommendations are adopted. The purpose of the recommendations is to ensure that children with more severe and complex SEN are placed in special schools, and that children with less severe and complex SEN have their needs met in more inclusive mainstream schools.

### *(3) Changes in the type of SEN provision in a special school/Academy*

Changes to the type of SEN provision made at a local authority maintained school must be made via the statutory 'Prescribed Alterations process', set out in sections 18-24 of the Education and Inspections Act 2006 (the "**2006 Act**"), the School Organisation (Prescribed Alterations to Maintained Schools) (England) Regulations 2013 (the "**Prescribed Alterations Regulations**"), and the "Making significant changes ('prescribed alterations') to maintained schools statutory guidance (the "**Guidance**"). If KCC is content to proceed with these proposals at this stage, the next step is to publish a statutory notice setting out the prescribed alteration proposed for each of the affected special schools that are maintained by KCC. Following a 4 week period for objections or representations to be submitted, KCC is required to consider any representations or objections received and decide whether to proceed with the proposed changes.

KCC does not have the power to change the type of SEN provision made at a special Academy which is part of an Academy Trust. This is because KCC does not have the power to alter how an academy is set up or operated. Any change to the designation of a special academy can only be made through a separate Academy Trust process for making significant changes to an academy. If an Academy Trust agree to



changes which are requested by KCC, the Academy Trust can apply to the Secretary of State through a separate significant changes mechanism, The Secretary of State will be the ultimate decision-maker as to whether changes to the designation and type of SEN provision that is made at special Academies should proceed. If members wish to proceed, KCC would ask the relevant Academy Trust to submit such an application, and KCC will confirm its support of the application to the Secretary of State.

Article 7 and 24 of the UN Convention of the Rights of Persons with Disabilities: The UK Government is committed to inclusive education of disabled children and young people and the progressive removal of barriers to learning and participation in mainstream education.

## **9. Equalities implications**

9.1 An Equalities Impact Assessment (EQIA) that has been updated in September 2024 can be found in appendix 4.

## **10. Risk and other factors**

10.1 As noted above, KCC entered into a Safety Valve agreement with the DfE in May 2023. Without the protection afforded by the Safety Valve, KCC would be required to make much more wide-ranging changes in an accelerated timeframe, potentially even being required to review historic placement decisions that did not align with national norms.

10.2 The Special Schools Review is supportive of the strategic objectives of Framing Kent's Future<sup>9</sup>, specifically Priority 4 New Models of Care and Support. The Special Schools Review aims to enable children and young people with SEND to access an education in a setting that is appropriate for their needs. This includes bringing together mainstream and special schools to support and learn from one another and to enhance inclusion across the county. This will enable, where appropriate, more mainstream schools to meet the needs of children and young people with SEND, increasing the choice and proximity of school places, as well as ensuring that special school places can be accessed, as locally as possible, to children and young people with the most severe and complex needs.

10.3 Securing Kent's Future<sup>10</sup> prioritises objective 4 within Framing Kent's Future, New Models of Care and Support (see point 6.3). The Special Schools Review will also enable the Local Authority to ensure that the Best Value duty is being applied and Kent is able to secure value for money in relation to the educational provision that children and young people with an EHCP access. As a Local Authority, under the 2014 Act, must comply with the parent/carer or young person's request unless attendance at the preferred school would not meet their special educational needs, or would be incompatible with the efficient education of others or the efficient use of resources. The efficient use of resources that is referenced under the 2014 Act regarding placement of children and young people with an EHCP ensures that as a Local Authority the

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<sup>9</sup> [Framing Kent's Future - Our Council Strategy 2022-2026](#)

<sup>10</sup> [Appendix 1 - Securing Kents Future - Cabinet report.pdf](#)

Best Value duty can be applied while ensuring a suitable education is provided to children and young people with an EHCP.

10.4 It is recognised that there is significant change taking place across the SEND service which carries a risk that the various initiatives being progressed could have a detrimental impact leading to confusion in the system. However, urgency for improvement dictates the need for all initiatives to progress. During the Special School Review work has been ongoing to ensure these interdependencies were individually recognised and aligned. By progressing the recommendations proposed KCC can cohesively support all change proposed across the education sector.

## **11. Future Consideration**

11.1 The next steps will depend on the outcomes of the work undertaken.

### **Governance**

11.2 The coordination and implementation of a cohesive system-wide change within the Kent SEND education system will be an iterative process. The decision at this stage sets out an updated policy position and confirms the direction of travel toward putting the required arrangements in place to facilitate a whole SEND education model shift towards the principles set out in KCC's Countywide Approach to Inclusive Education and allows for the commencement of relevant legal processes necessary to move toward implementation.

11.3 The decision will grant authority to commence the statutory prescribed alterations process – this involves publishing notices of the proposed changes to the affected school. However, further review and feasibility work will be undertaken prior to the notice being issued. Authority to approve the final notices, taking account of the further work is delegated to the Director of Education and SEND. Final decisions on the implementation of the proposed changes, following the public notice stage, will be subject to relevant Key Decisions.

11.4 The above process and governance arrangements apply to both the maintained school next steps and the Academy Trust position – as above, final decisions on the implementation of key changes will be progressed following the relevant notice periods and consideration of feedback and updated information.

11.5 In addition to the prescribed changes elements, the decision also include the establishment of a School-to-School Support Model. The principles of this model are set out in the decision, including updates in response to the consultation. The detailed design and operations of the model will be managed in partnership with the schools and approved via delegated authority to the Director of Education and SEND.

11.6 The potential changes and further activity described as 'Phase two' within the report, represent areas where additional work is required before KCC is in a position to make any final decisions – these are therefore not within the

scope of choices and decisions being made by the Council at this point in time. Key elements to highlight here, that are not being determined via the decision but are relevant to the wider Strategic approach KCC is exploring, include:

- 11.6.1 Special school capital programme; This programme is one of the means by which KCC aims to ensure that safe and suitable facilities are available to meet the local demand for special school placements, with a transparent approach to prioritising schools' capital spend. This will enable special school Headteachers, Governors and Local Authority Officers to plan accordingly.
- 11.6.2 Revenue school funding; The principles of a future funding model for state-funded special schools have been broadly accepted with a proposed tariff model that is graduated to take account of the extent to which the curriculum is adapted for children and young people with SEND. This is in line with the DfE's direction of travel and would complement the proposed changes to the designation and accompanying admission guidance for special schools outlined in this report. The future funding model for state-funded special schools will be consulted on separately with schools.
- 11.6.3 Post 16 provision and pathway; The curriculum should be planned to support young people's transition from school to FE college or other educational settings and ultimately to independence in adulthood. This planning should ensure continuity and progression from Year 11 (or up to year 13 in school) to year 14 (including college, SPI, supported internships and/or apprenticeships). This ongoing work is aligned with other ongoing projects within KCC that involve stakeholders from the post-16 sector.
- 11.6.4 Special school satellite provision; A satellite provision is a specialised provision within a mainstream primary or secondary school, managed by staff from a special school. While these children remain on roll at the special school, the satellite provision offers a personalised plan within the mainstream school. KCC has identified through the Special School Review that satellites have evolved in an ad hoc manner in response to the increased demand of special school places. Additionally, the SRP Review has identified that the SRP provision has also developed without appropriate strategic planning for SRP continuum of provision across educational phases. Therefore, there is a need to review the relative roles of satellite provision and SRPs in phase two of the special school review.

11.7 They are presented to provide context and information, as well as give relevant assurances that the progression or otherwise of these potential changes will be subject to all normal governance processes, including Key Decisions where appropriate under the Constitutional requirements of the Council.

11.8 The Director of Education and SEND will, as per standard Executive Decision arrangements, receive normal delegated authority to take the required actions to implement the decision.

## 12. Conclusions

12.2 In conclusion, the proposals outlined in this report are designed to enable KCC to proceed with the next phase of its decision-making in respect of the Special School Review, to drive systemic transformation for children and young people with SEND across the educational sector. By strategically planning special school placements within local communities, of which ensuring special schools have the appropriate SEND designations is a part, KCC aims to better support children and young people in preparing for adulthood.

12.3 Ultimately, the proposals considered in this report will lay the foundation for the next stage of the Kent special school sector, enabling a responsive and flexible approach that instils confidence in children, young people and their families in their pathway to adulthood.

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### Recommendation(s):

That the Children, Young People and Education Cabinet Committee is asked to consider and either ENDORSE or MAKE RECOMMENDATIONS to the Cabinet Member on the proposed decision as set out in this report and the Proposed Record of Decision (Appendix 5)

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## 13. Background Documents

UN Convention of the Rights of Persons with Disabilities [enable convention cover \(un.org\)](https://www.un.org/)

SEND Code of Practice - <https://www.gov.uk/government/publications/send-code-of-practice-0-to-25>

SEND and AP Improvement Plan - <https://www.gov.uk/government/publications/send-and-alternative-provision-improvement-plan>

DfE and Kent Safety Valve Agreement - [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1143013/Kent\\_Safety\\_Valve\\_Agreement\\_2022\\_2023.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1143013/Kent_Safety_Valve_Agreement_2022_2023.pdf)

SEND Ofsted and CQC inspection information - <https://www.kent.gov.uk/education-and-children/special-educational-needs/listening-to-your-voice-and-taking-action/ofsted-and-cqc>

Framing Kent' Future - <https://www.kent.gov.uk/about-the-council/strategies-and-policies/framing-kents-future>

Securing Kent's Future – [Appendix 1 - Securing Kents Future - Cabinet report.pdf](#)

Children and Families Act (2014) - <https://www.legislation.gov.uk/ukpga/2014/6>

## 14. Appendices

Appendix 1: Supporting Analytics  
Appendix 2: Consultation Analysis Report  
Appendix 3: Consultation Formal Response  
Appendix 4: Equalities Impact Assessment (EQIA)  
Appendix 5: Proposed Record of Decision

## 15. Contact details

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# Appendix 1

## Special School Review – Supporting Analytics

# Item 1: Special School Rate, Kent at National Average

## 2024 Percentage of Pupils in a Special School

England: 1.6%

Kent: 2.3%

Chart 1

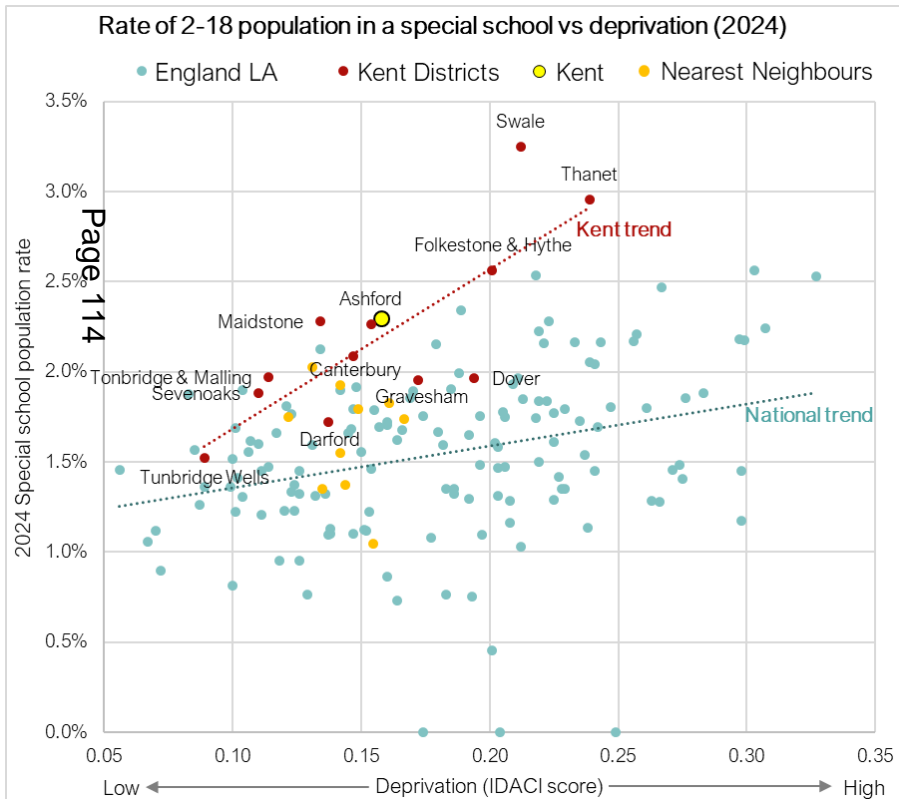
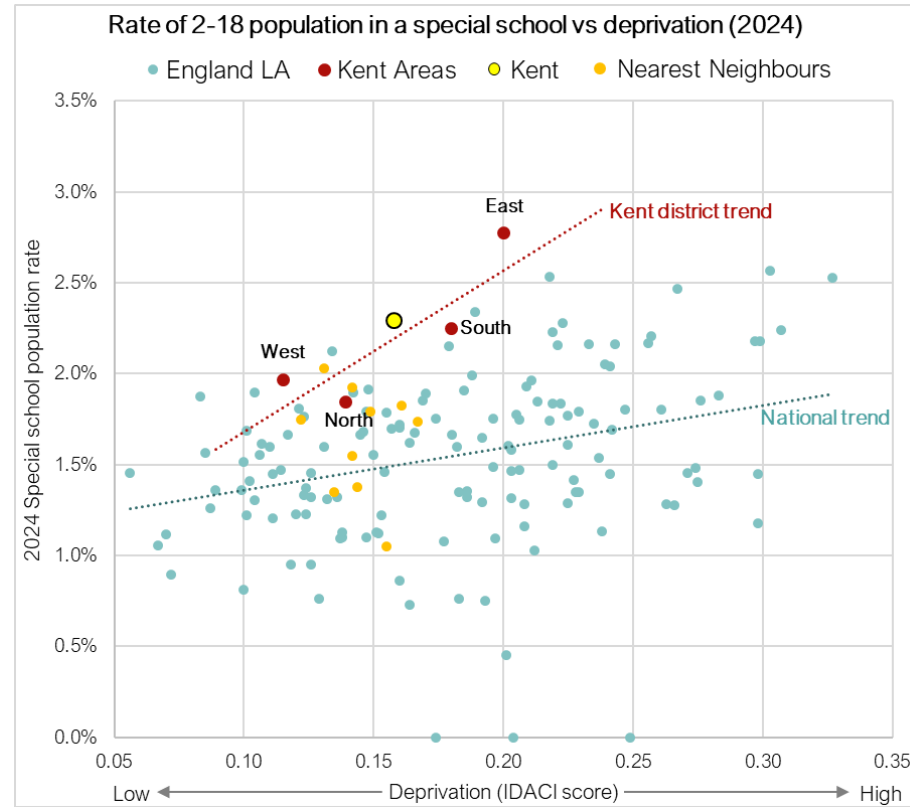


Chart 2



The charts show the percentage of the population in special schools (including INMSS) for all local authorities (LAs) in England in relation to the deprivation level (IDACI Income Deprivation Affecting Children Index). Chart 1 includes the special school rate for each District in Kent and Chart 2 shows the rate by area.

They indicate that both Kent and its districts have a higher percentage compared to the national trend. Kent recorded 2.3% of the population in special schools, while the percentage for England was 1.6%.



# Item 2: Special School Rate, Kent at National Average

## 2024 Percentage of Pupils in a Special School

England: 1.6%

Kent: 2.3%

Chart 1 shows the current special school pupil rate (including INMSS) by district and the necessary adjustment, in each district, required (blue arrows) for Kent to reach the national average of 1.6% overall. Whereas Chart 2 shows the adjustments required at the area level. This adjustment takes into account the local variability observed across the county's districts based on deprivation levels.

Table 1 details the change in the rate of the population in a special school that is required in each area for Kent to achieve the national average. It also includes the proposed special school places in each area as a rate of the 2024 population.

Chart 1

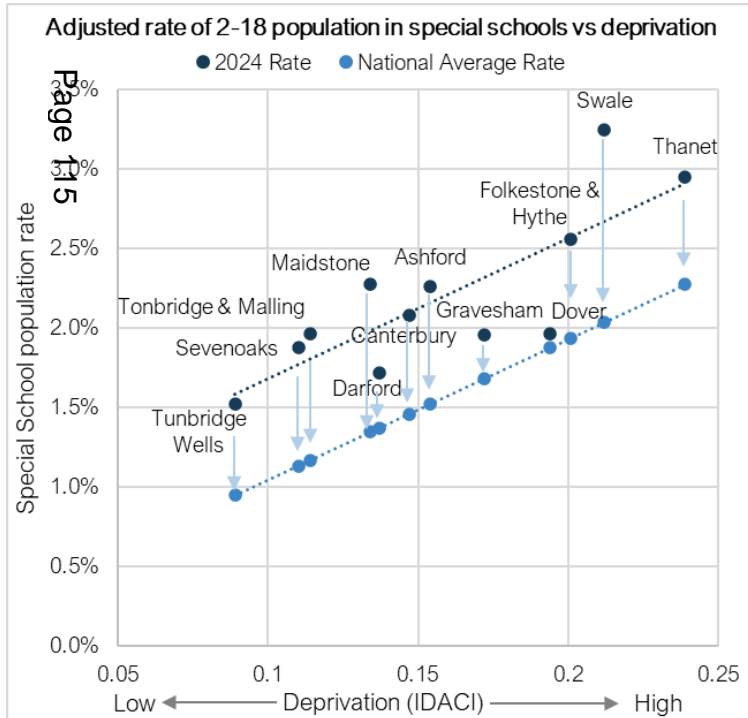


Chart 2

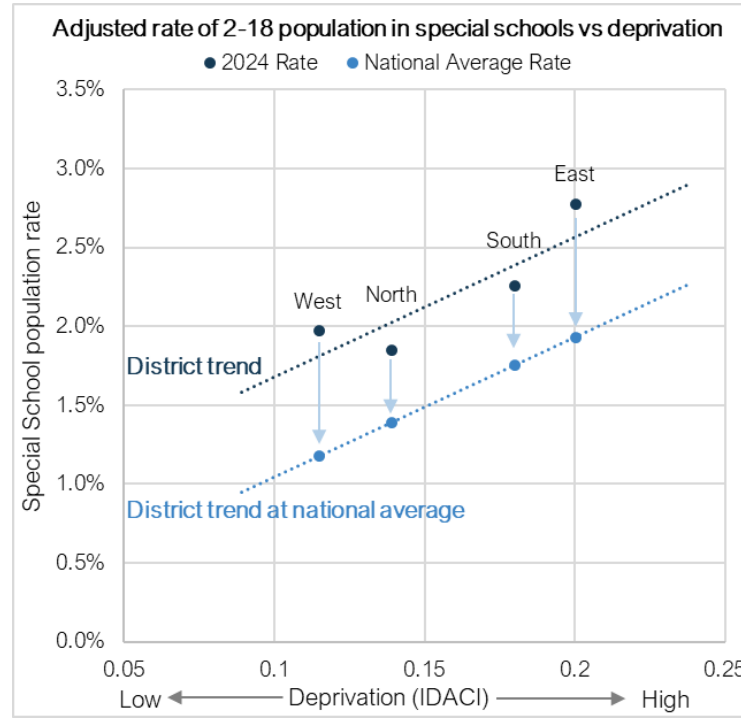


Table 1: Rate of population in special schools & proposed placements

Area	Current Pupils (2024)	Adjusted for Kent to be at National Average
North	1.8%	1.4%
South	2.3%	1.8%
East	2.8%	1.9%
West	2.0%	1.2%
<b>Kent</b>	<b>2.3%</b>	<b>1.6%</b>

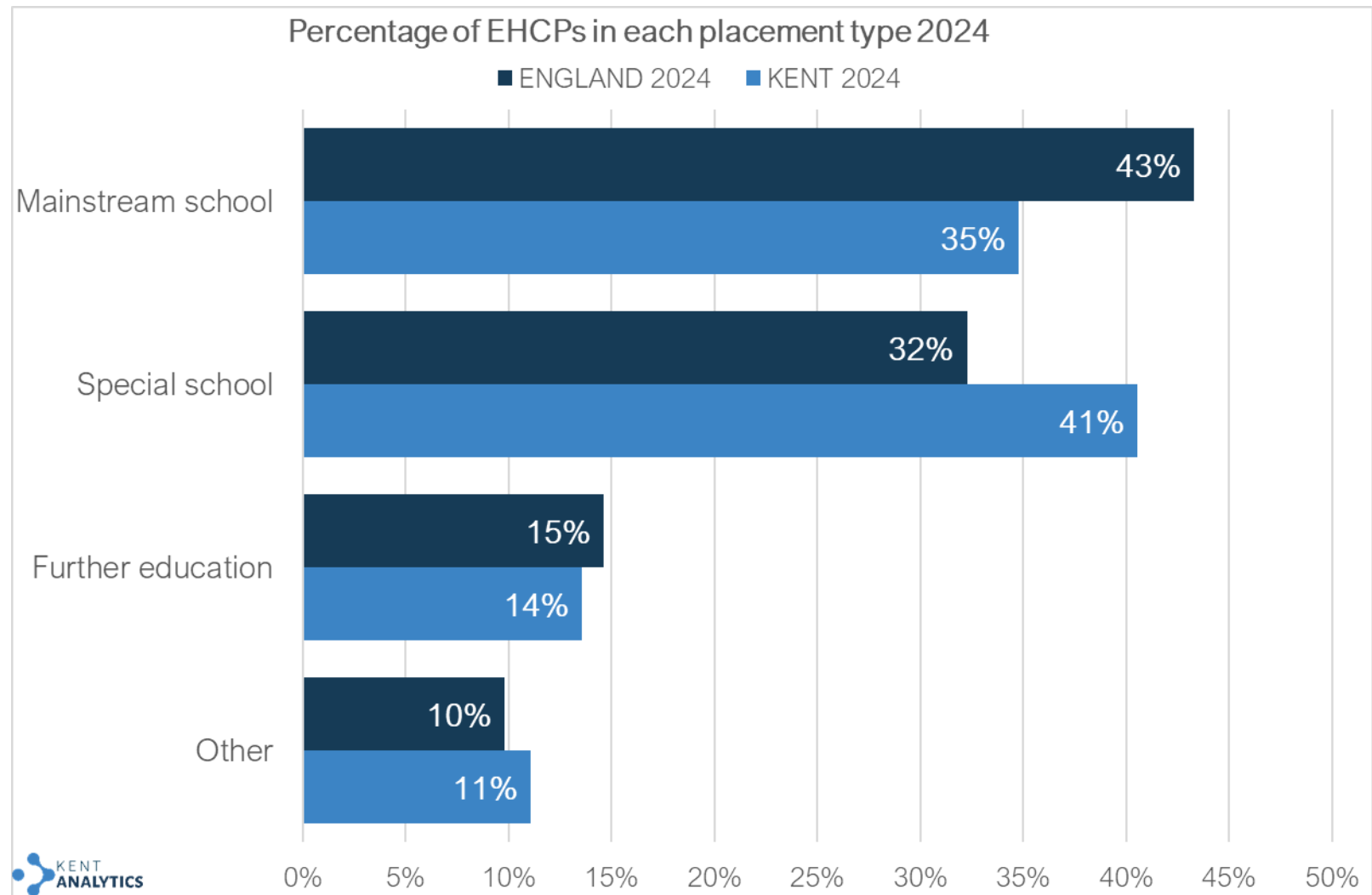
[Education, health and care plans, Reporting year 2024 – Explore education statistics – GOV.UK \(explore-education-statistics.service.gov.uk\)](https://www.explore-education-statistics.service.gov.uk)

District/Area Source: Finance 23-24 INMSS & Special School spend by district

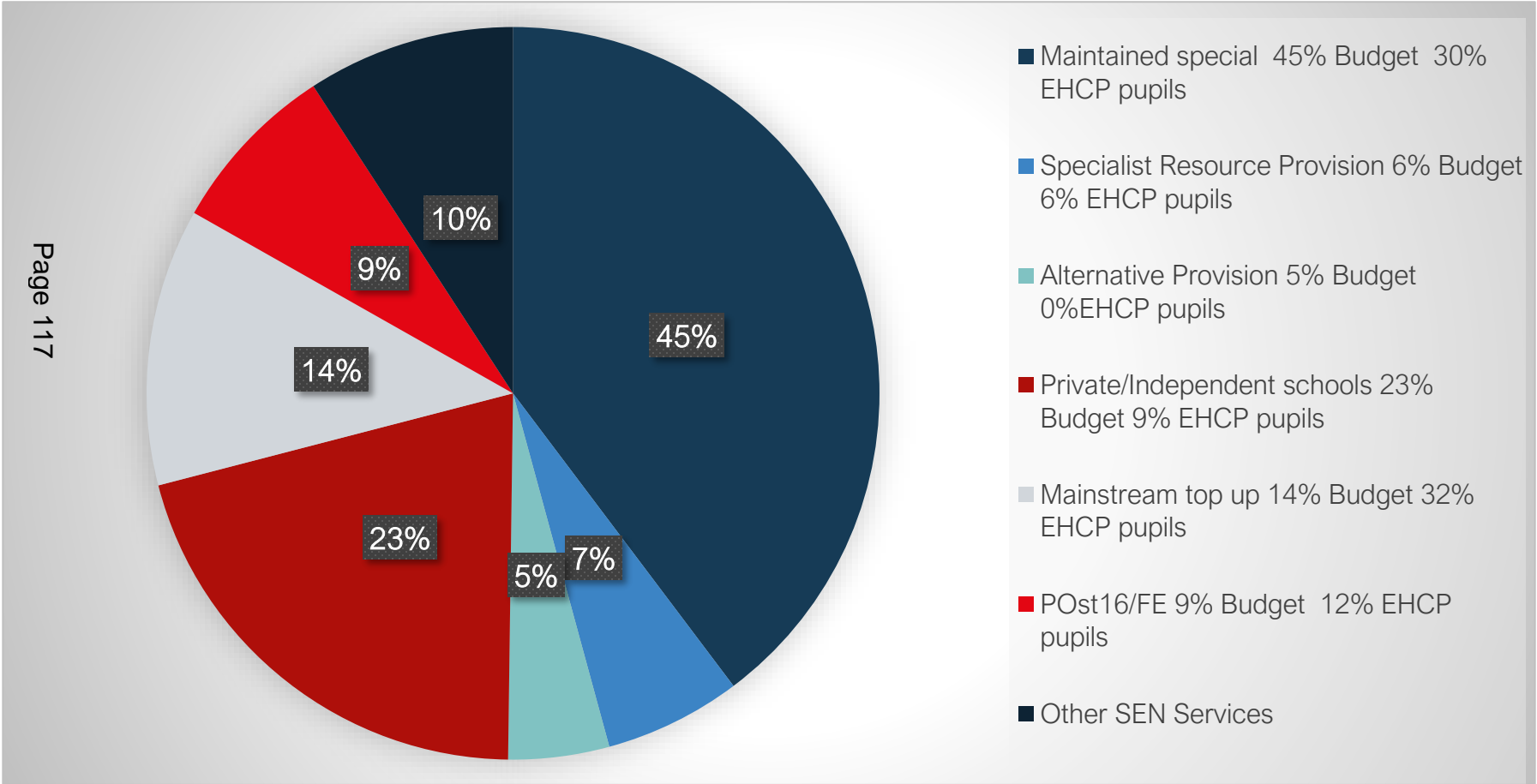
# Item 3: 2024 EHCP: England vs Kent (SEN2) Placement Type

When analysing the distribution of EHCPs by placement type in 2024, Kent has proportionally more CYP with an EHCP in special schools and fewer in mainstream schools, when compared to England.

Page 118  
Compared to 2023, these rates have not significantly changed in England. However, Kent significantly decreased from 18% to 14% in further education and increased from 8% to 11% in other placements.



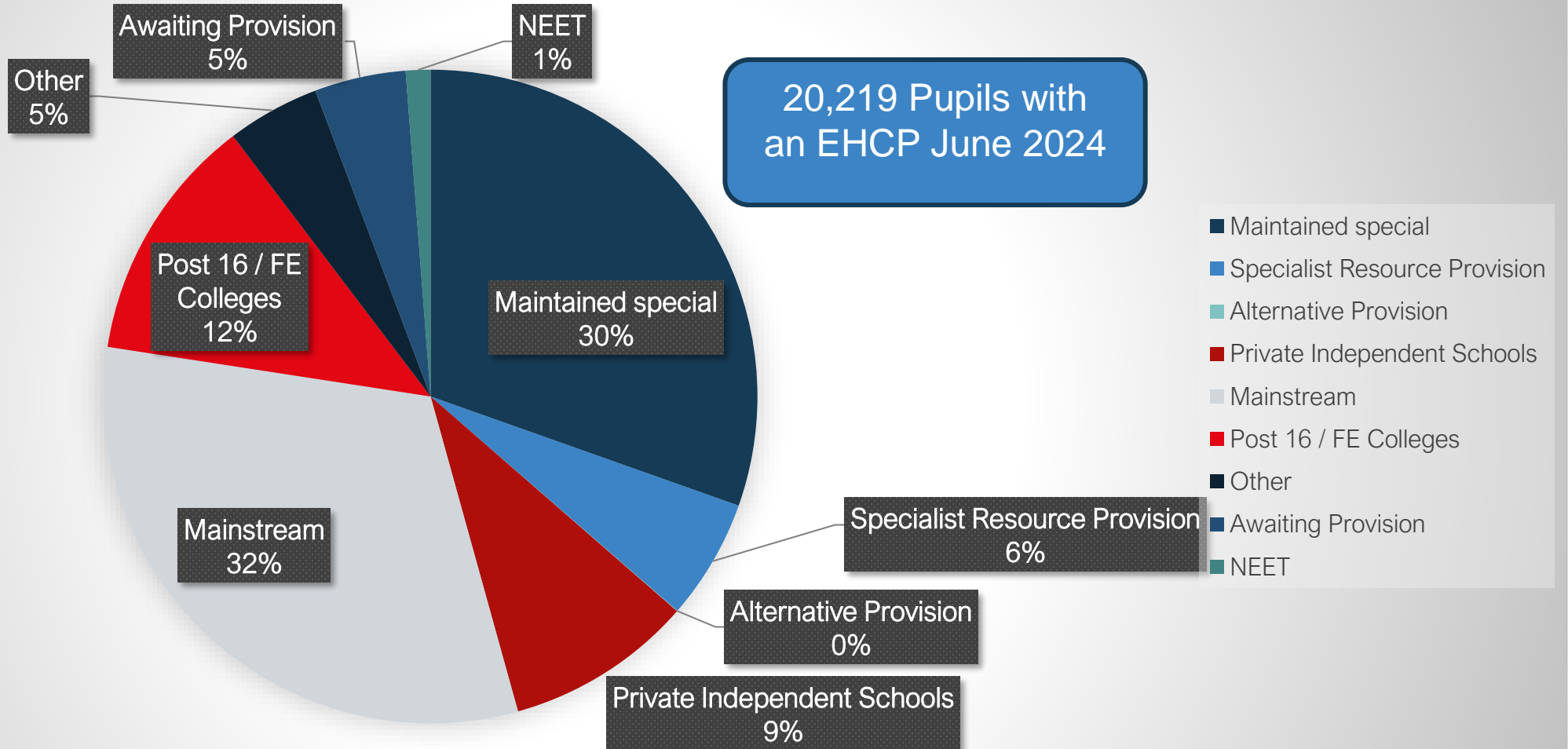
# Item 4: High Needs Funding Budget Spend 2023-24



- Total spend £371.2m
- Total income £328.9m
- 113% of the income - Percentage calculated against income

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# Item 5: Distribution of Pupils (excluding EY)



# Item 6: Kent Special School Pupils

The following table shows which districts special school pupils are attending based on their primary needs. For example: 37.1% of pupils with MLD attend school in Maidstone.

		School District											
		ASH	CAN	DAR	DOV	F&H	GRA	MAI	SEV	SWA	THA	T&M	TW
Primary Need	ASD	8.4%	5.2%	2.2%	1.5%	6.2%	4.5%	19.0%	6.5%	10.4%	14.3%	9.7%	12.0%
	HI		14.3%			7.1%		28.6%			42.9%		7.1%
	MLD	5.2%	9.5%	1.0%	0.5%	12.4%	2.4%	37.1%	1.0%	0.5%	2.4%	7.1%	21.0%
	MSI		20.0%			20.0%		20.0%			20.0%		20.0%
	OTH	10.0%	8.3%			6.7%		15.0%	3.3%	1.7%	30.0%	6.7%	18.3%
	PD	5.7%	8.3%			4.8%	2.2%	12.2%	54.6%	4.4%	2.6%	3.1%	2.2%
	PMLD	8.1%	5.6%			11.1%	7.0%	14.4%	21.9%	11.5%	12.6%	7.4%	0.4%
	SEMH	15.9%	8.4%	10.3%	21.8%	0.6%	0.7%	26.1%	0.7%	1.0%	8.9%	2.5%	3.1%
	SLCN	3.6%	15.5%	1.4%	0.6%	10.4%	7.8%	25.4%	4.3%	8.4%	8.7%	4.0%	9.9%
	SLD	13.8%	8.8%			7.1%	5.7%	21.1%	8.8%	16.9%	5.5%	7.3%	5.0%
	SPLD	3.2%	8.1%	14.5%		21.0%		17.7%		11.3%	4.8%	14.5%	4.8%
VI	16.7%	11.1%			22.2%	16.7%	16.7%	11.1%	5.6%				
Grand Total		8.9%	7.6%	2.7%	3.3%	6.8%	4.5%	21.0%	8.0%	9.1%	11.3%	7.5%	9.4%

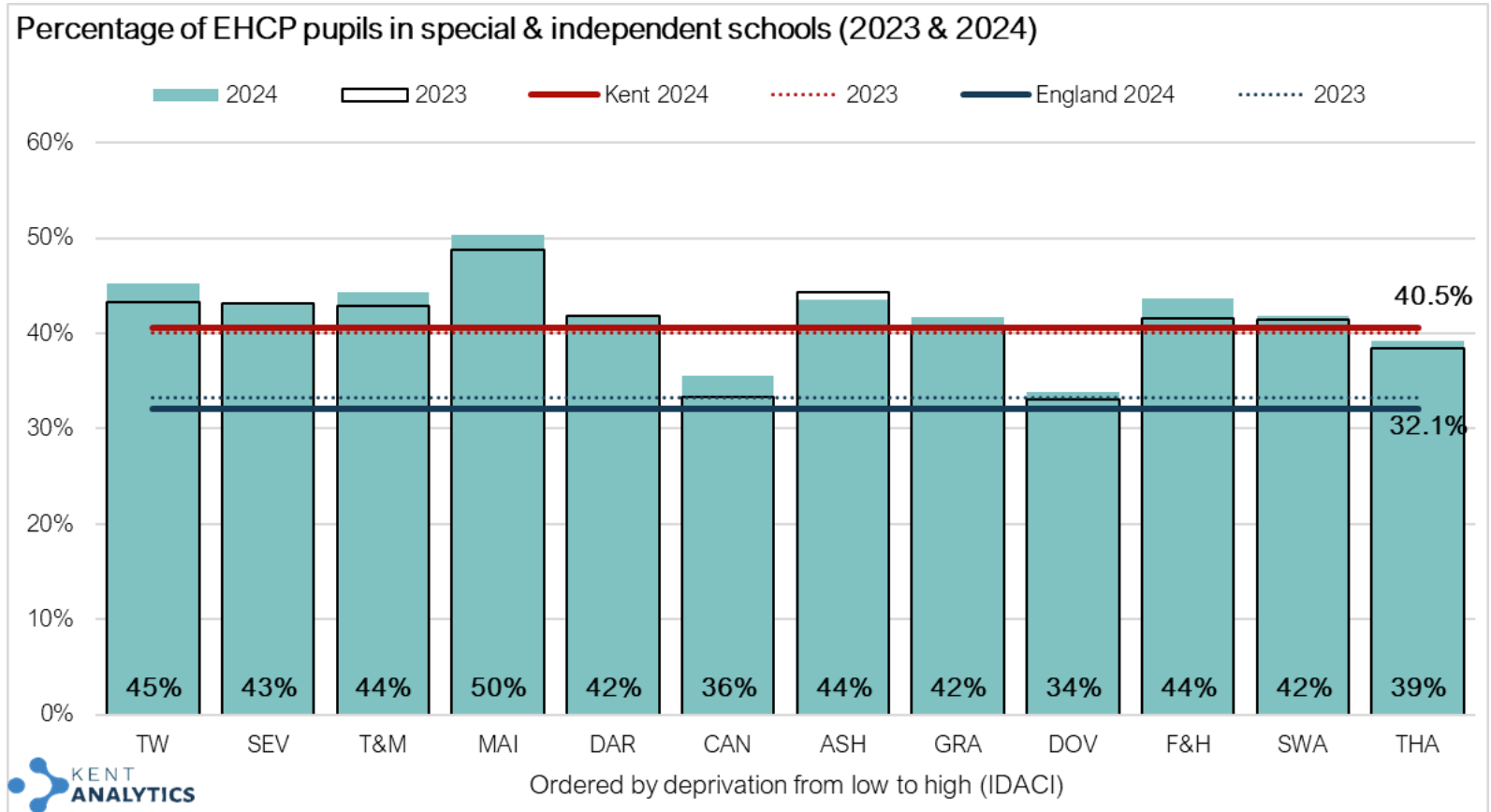
It is important to note:

- Dover pupils with PSCN needs are placed in Whitfield Aspen 1 (primary) & 2 (secondary) Special Resource Provision (mainstream) rather than special school.
- Milestone school is in the north of Sevenoaks on the boundary with Dartford district.
- Dartford doesn't have a PSCN school. Dartford children and young people are placed at Milestone.

# Item 7: 2024 EHCP England vs Kent vs District (SEN2) Special School Rate

The percentage of EHCP pupils in special and independent schools is much higher in all districts compared to England, except for Dover. The largest proportion is in Maidstone.

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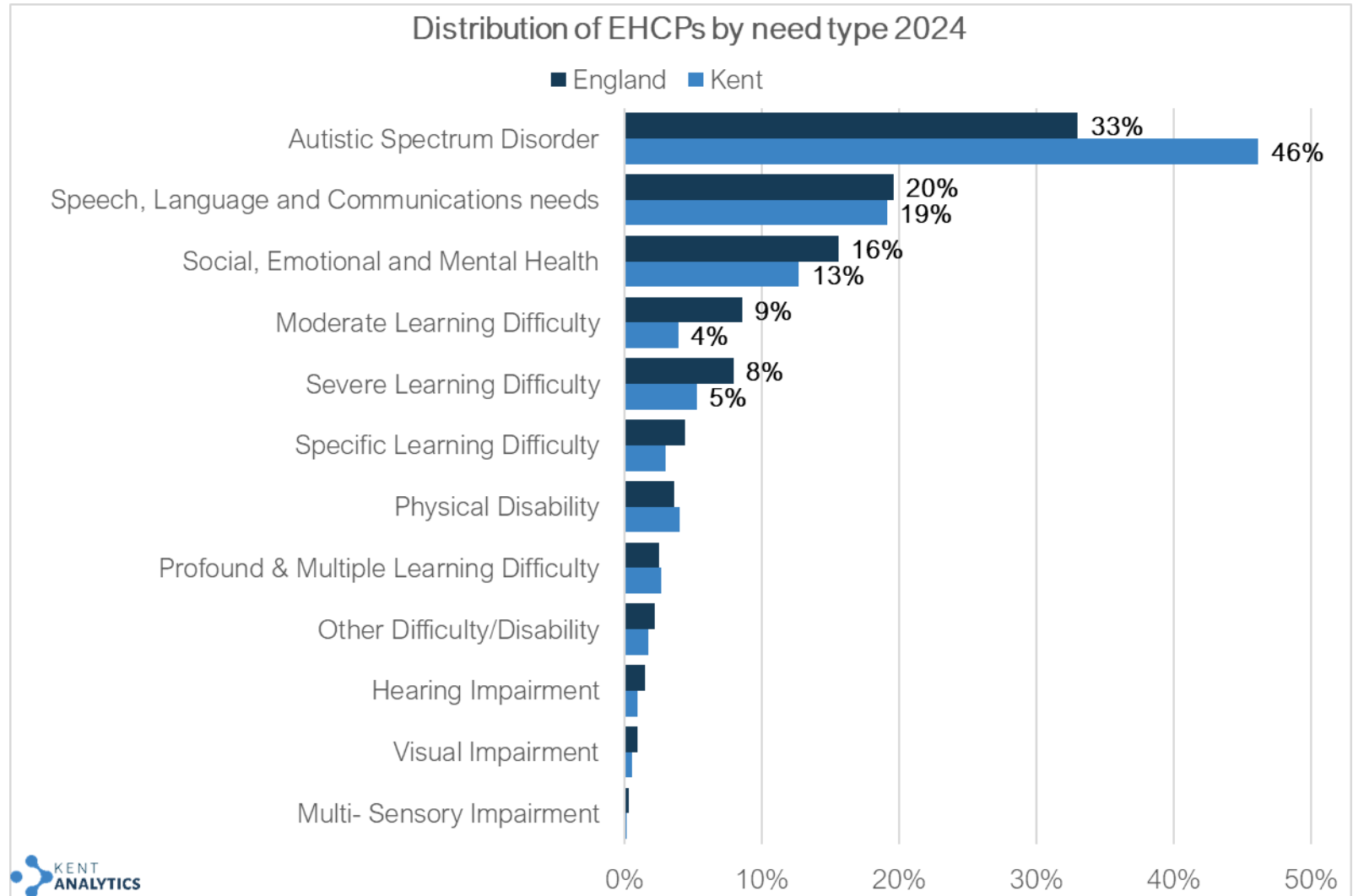
Source: Residential district, January 2024 SEN2. It includes maintained special and independent special and non-special schools.

[Education, health and care plans, Reporting year 2024 – Explore education statistics – GOV.UK \(explore-education-statistics.service.gov.uk\)](https://explore-education-statistics.service.gov.uk)

# Item 8: 2024 SEND Pupils: England vs Kent (School Census) EHCP Need Type

When analysing the distribution of pupils with an EHCP by need type in 2024, Kent has proportionally more pupils with an EHCP for autism spectrum disorder and proportionally fewer with moderate learning difficulties, when compared to England.

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# Summary of previous special school reorganisation

During the reorganisation, moderate learning difficulties special schools were repurposed into schools for 'behaviour and learning', while some schools retained their specialisms, such as physical disabilities and complex medical needs at Valence and social, emotional, and mental health ("**SEMH**") with average or above-average attainment at Goldwyn and Portal House. Schools that had previously specialised in meeting speech and language or specific learning difficulties, such as Laleham Gap and Grange Park, were designated as communication and interaction ("**C&I**") schools. This shift reflected the increasing demand for children with autism spectrum disorder provision, as well as KCC's aim to reduce reliance on high-cost placements in private and non-maintained special schools.

As part of the changes, Broomhill Bank, which had previously been a day and residential school for girls with moderate learning difficulties, transitioned to a communication and interaction special school. More recently, Snowfields, a new special school near Maidstone, was opened to serve secondary pupils with C&I needs, and Aspire, a new primary-age special free school was established in Sittingbourne for pupils with C&I. Stone Bay was maintained as a day and residential school for pupils with C&I and more significant learning disabilities.

The reorganisation was successful in reducing reliance on private and non-maintained special school placements in the short term, with numbers decreasing from 450 in 2002 to just under 240 in 2006. The objective was also to ensure more localised provision so that families with a child or children with profound, severe, and complex SEND ("**PSCN**") would have access to a local special school within the district where they lived. These schools would provide special education for between 120 and 200 children and young people aged 2-19 within their local area. The new behaviour and learning schools were for children and young people with challenging behaviour. These special schools were to provide special school placements for families across two districts and planned to provide for, approximately 60 secondary pupils and between 12 and 36 primary pupils. Schools with a more specialist function were intended to serve a broader geographical area.



## Further Information

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# KENT COUNTY COUNCIL SPECIAL SCHOOLS REVIEW CONSULTATION REPORT

PREPARED BY LAKE MARKET RESEARCH



# CONTENTS

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## 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 agree<sup>1</sup>). 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 agree<sup>2</sup>). 61% disagree with the proposed approach and the strength of disagreement is quite high (8% tend to disagree, 53% strongly disagree).

---

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

<sup>2</sup> 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](http://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.

<b>Document name</b>	<b>Downloads / views</b>
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/carer 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/carer 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.

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

<b>AGE (RESIDENT CONSULTEES ONLY)</b>	<b>Number of responses</b>	<b>Percentage</b>
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%

<b>DISABILITY (RESIDENT CONSULTEES ONLY)</b>	<b>Number of responses</b>	<b>Percentage</b>
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%

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

<b>ETHNICITY (RESIDENT CONSULTEES ONLY)</b>	<b>Number of responses</b>	<b>Percentage</b>
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%

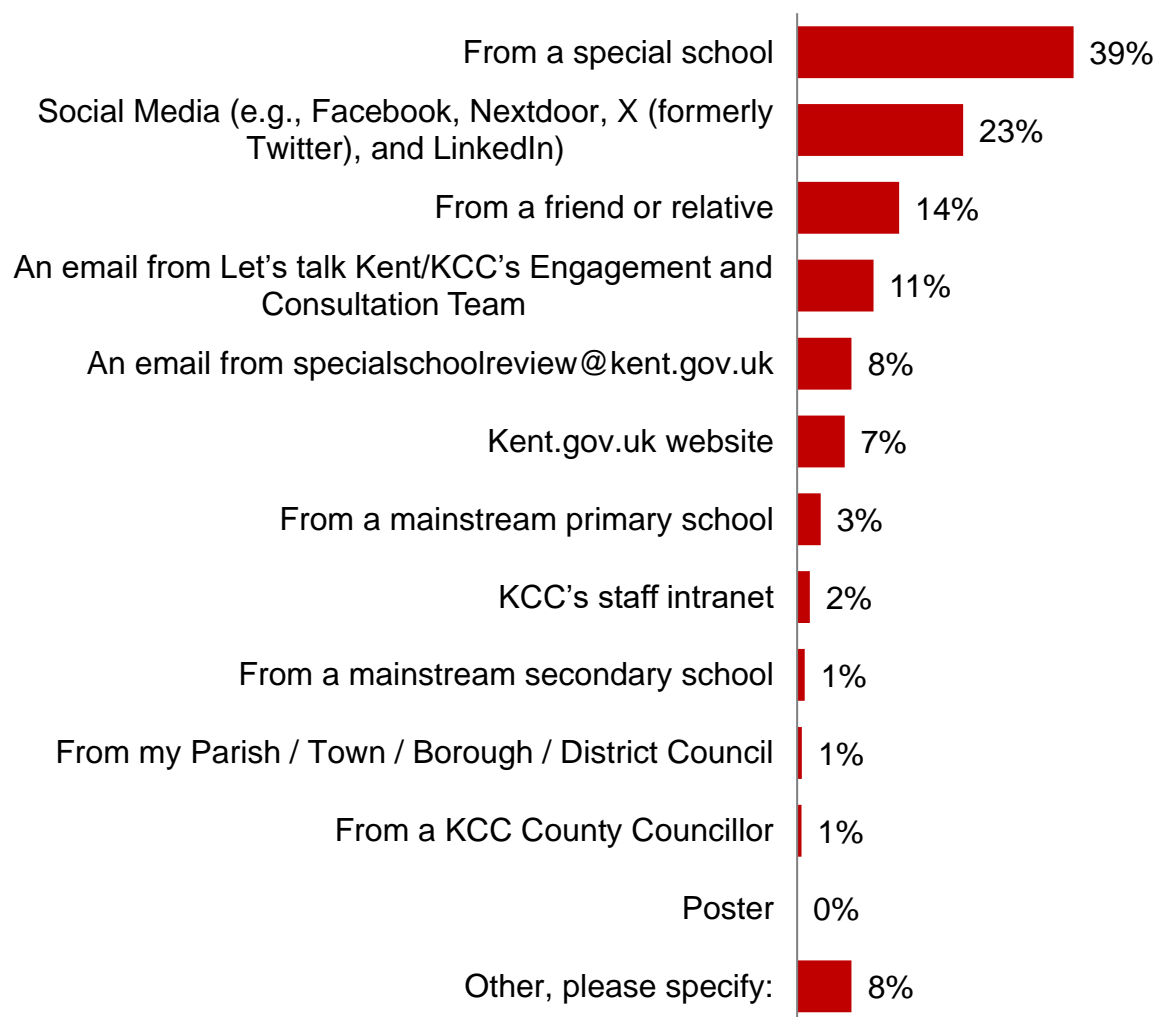
<b>RELIGION (RESIDENT CONSULTEES ONLY)</b>	<b>Number of responses</b>	<b>Percentage</b>
Yes	200	23%
- Christian	182	21%
- Buddhist	1	0.1%
- Hindu	1	0.1%
- Sikh	2	0.2%
- Other	10	1%
No	508	60%
Prefer not to say / blank	145	17%

## 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	Page 138	14	1%



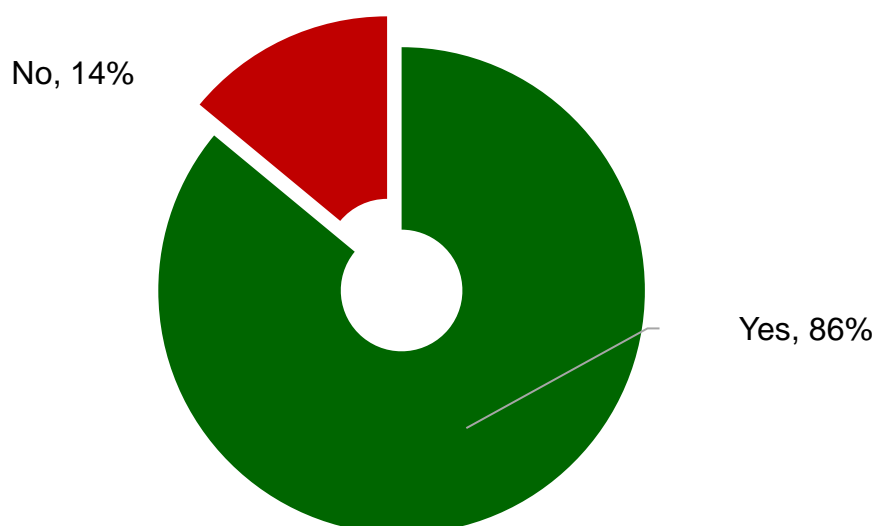
<b>SUPPORTING DATA TABLE</b>	<b>Number of responses</b>	<b>Percentage</b>
From my Parish / Town / Borough / District Council	9	1%
From a KCC County Councillor	8	1%
Poster	0	0%
Other (e.g. IASK, word of mouth, online articles)	102	8%

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

## Proportion of consultees with child in education

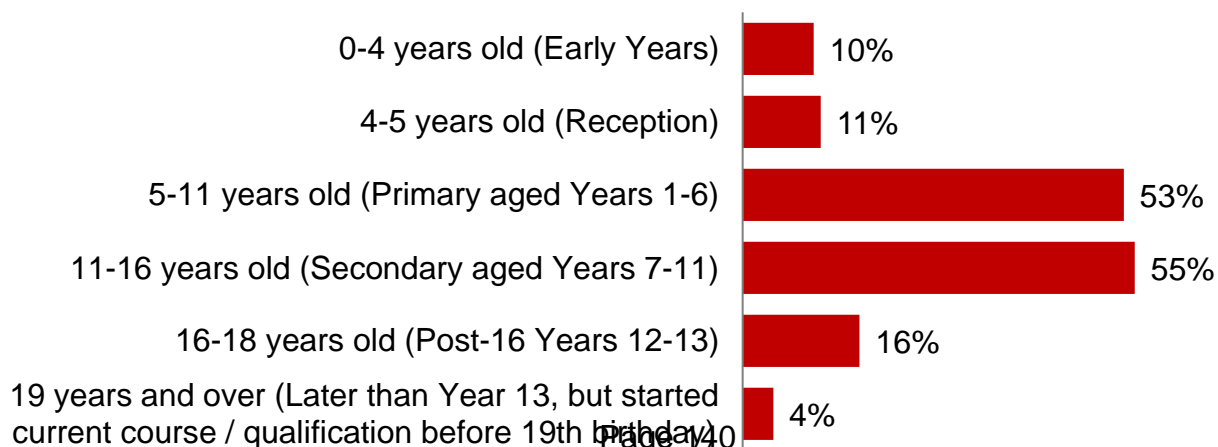
The majority of residents / individuals answering the consultation indicated they are a parent / carer of a child / children in education (86%). 53% of these residents / individuals have at least one primary aged child (aged 5-11 years old). 55% of these residents / individuals have at least one secondary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



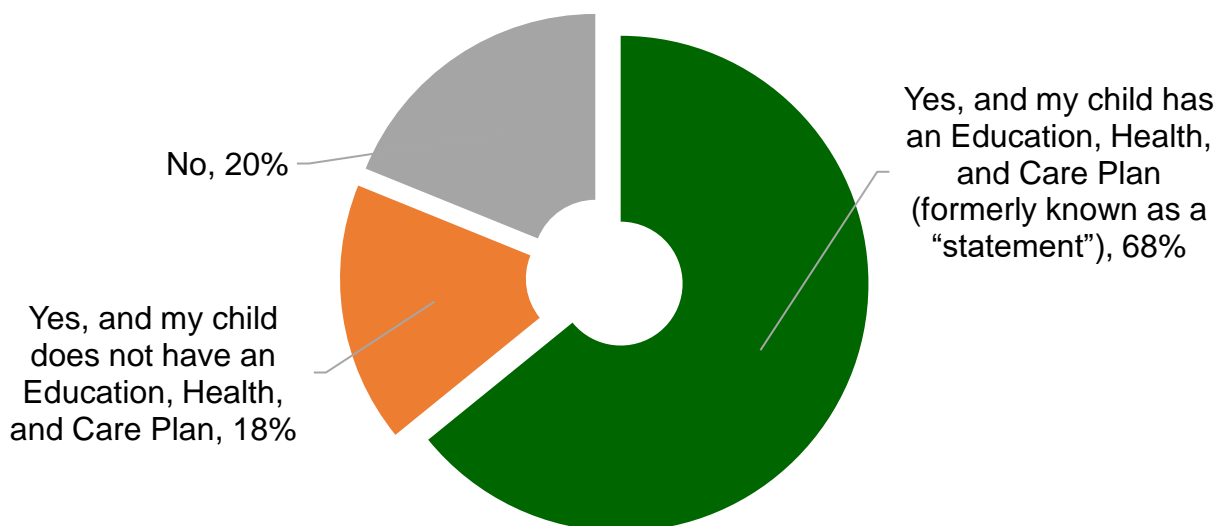
SUPPORTING DATA TABLE	Number of responses	Percentage
0-4 years old (Early Years)	79	10%
4-5 years old (Reception)	87	11%
5-11 years old (Primary aged Years 1-6)	424	53%
11-16 years old (Secondary aged Years 7-11)	436	55%
16-18 years old (Post-16 Years 12-13)	130	16%
19 years and over (Later than Year 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?

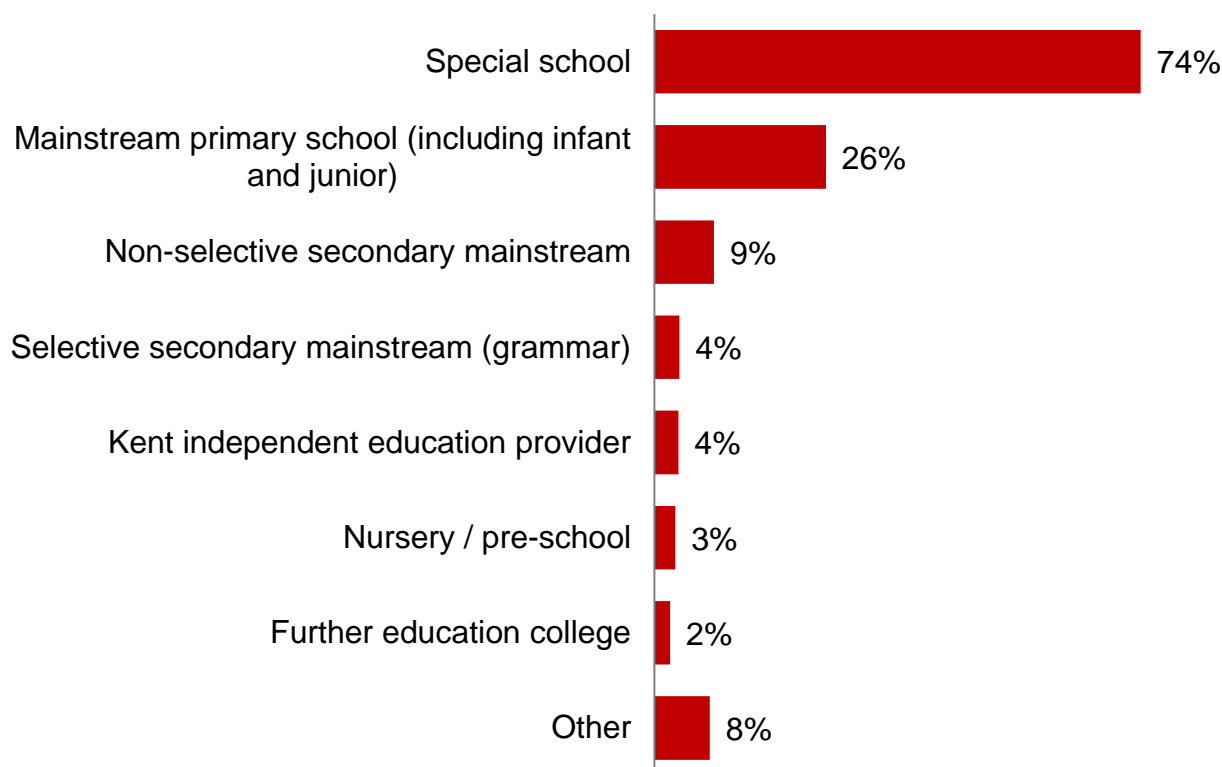
Base: all non-organisations / not answering questionnaire in professional capacity (930), the sum of individual percentages may not sum to 100% due to rounding.



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)



<b>SUPPORTING DATA TABLE</b>	<b>Number of responses</b>	<b>Percentage</b>
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

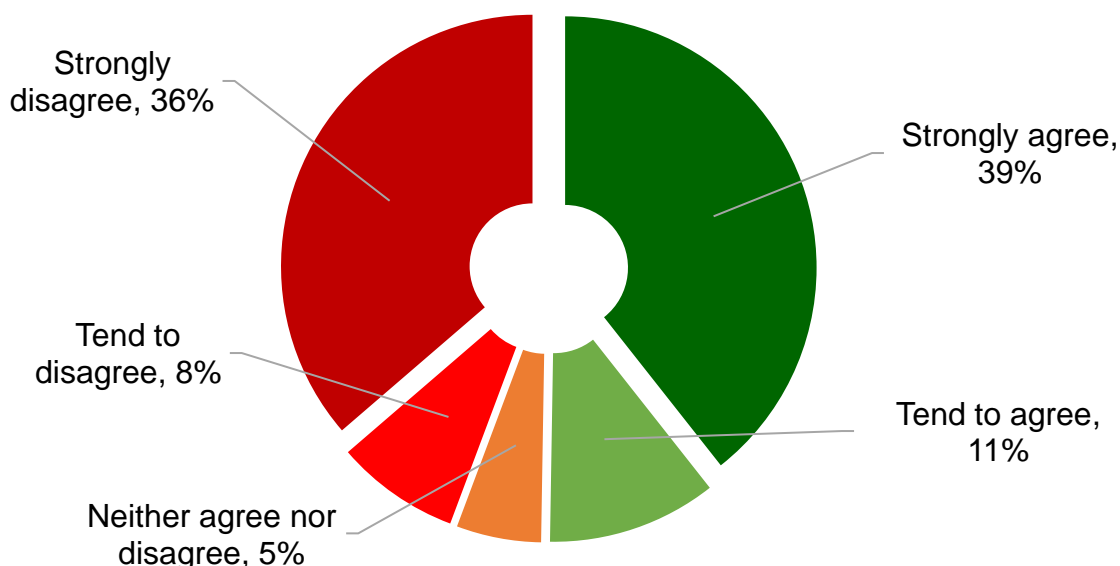
This section of the report details response to the proposals put forward in the consultation.

## 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

<b>% THEME</b>	<b>Number of responses</b>	<b>Percentage</b>
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%

<b>% THEME</b>	<b>Number of responses</b>	<b>Percentage</b>
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. Mainstreams 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.”**

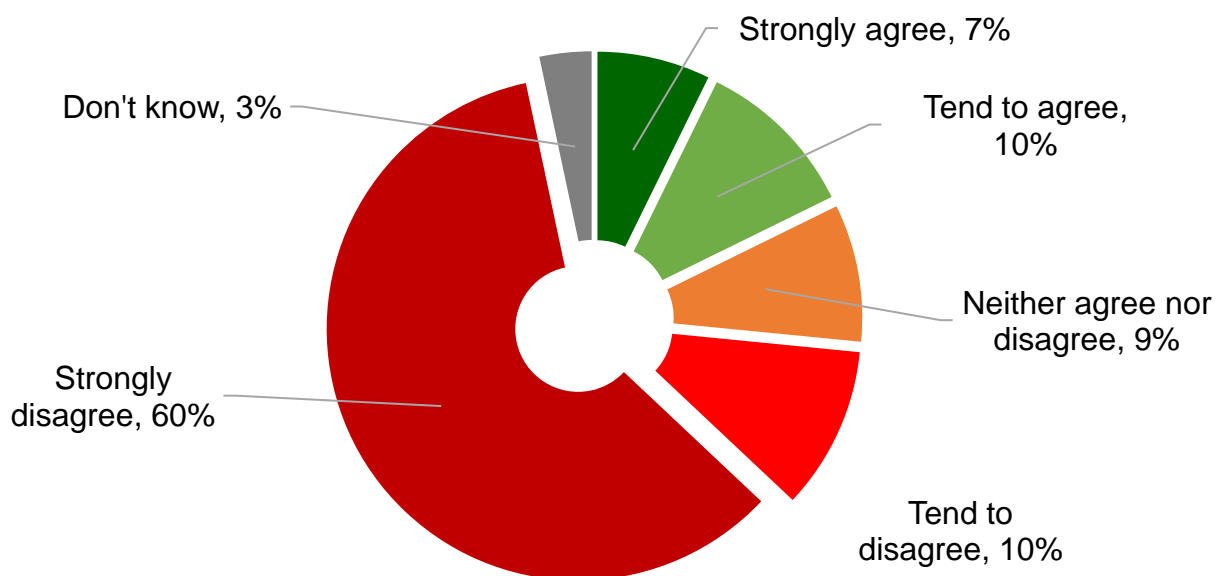
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## Proposed designation and admission guidance

### 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 agree<sup>3</sup>). 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%

<sup>3</sup> 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%

<b>% THEME</b>	<b>Number of responses</b>	<b>Percentage</b>
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%

<b>% THEME</b>	<b>Number of responses</b>	<b>Percentage</b>
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 or 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.”**

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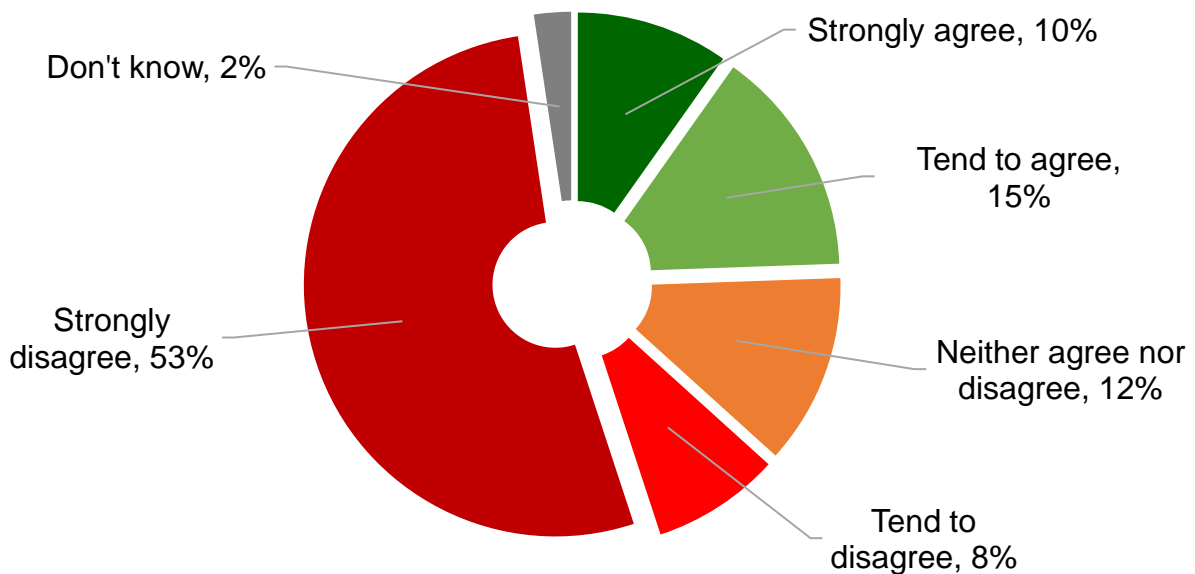
## Proposed implementation

### 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 agree<sup>4</sup>). 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%

<sup>4</sup> 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

<b>% THEME</b>	<b>Number of responses</b>	<b>Percentage</b>
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%



<b>% THEME</b>	<b>Number of responses</b>	<b>Percentage</b>
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.”**

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## Proposed school-to-school model of support

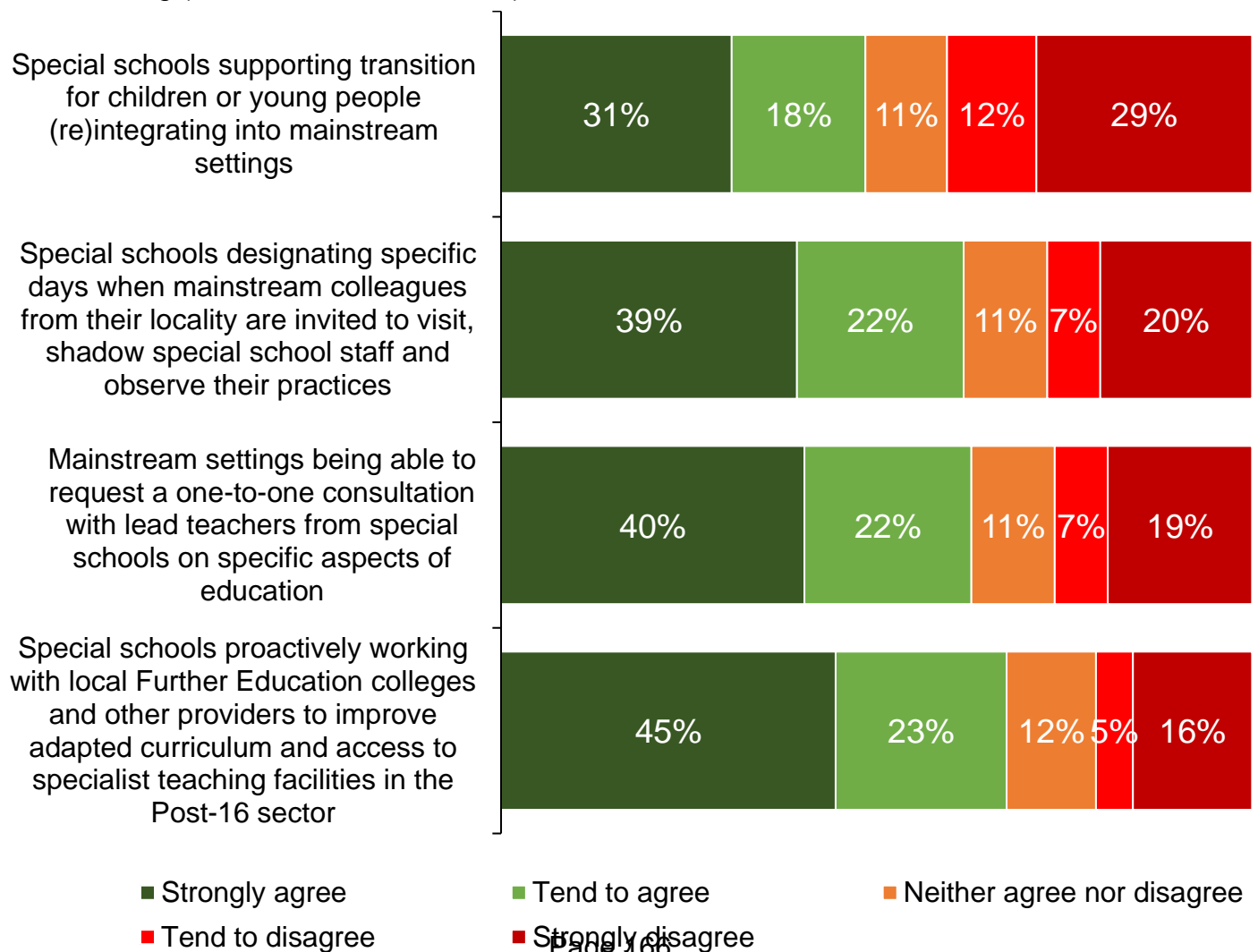
### Agreement with prompted actions being part of the model

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**

<b>SUPPORTING DATA TABLE</b>	<b>Number of responses</b>	<b>Percentage</b>
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**

<b>SUPPORTING DATA TABLE</b>	<b>Number of responses</b>	<b>Percentage</b>
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**

<b>SUPPORTING DATA TABLE</b>	<b>Number of responses</b>	<b>Percentage</b>
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**

<b>SUPPORTING DATA TABLE</b>	<b>Number of responses</b>	<b>Percentage</b>
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.

<b>Special schools supporting transition for children or young people (re)integrating into mainstream settings</b>	<b>Agree %</b>	<b>Disagree %</b>
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%

<b>Special schools designating specific days when mainstream colleagues from their locality are invited to visit, shadow special school staff and observe their practices</b>	<b>Agree %</b>	<b>Disagree %</b>
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%

<b>Mainstream settings being able to request a one-to-one consultation with lead teachers from special schools on specific aspects of education</b>	<b>Agree %</b>	<b>Disagree %</b>
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%

<b>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</b>	<b>Agree %</b>	<b>Disagree %</b>
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.

<b>Special schools supporting transition for children or young people (re)integrating into mainstream settings</b>	<b>Agree %</b>	<b>Disagree %</b>
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%

<b>Special schools designating specific days when mainstream colleagues from their locality are invited to visit, shadow special school staff and observe their practices</b>	<b>Agree %</b>	<b>Disagree %</b>
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%

<b>Mainstream settings being able to request a one-to-one consultation with lead teachers from special schools on specific aspects of education</b>	<b>Agree %</b>	<b>Disagree %</b>
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%

<b>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</b>	<b>Agree %</b>	<b>Disagree %</b>
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

<b>% THEME</b>	<b>Number of responses</b>	<b>Percentage</b>
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.....”**

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## **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

<b>% THEME</b>	<b>Number of responses</b>	<b>Percentage</b>
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%

<b>% THEME</b>	<b>Number of responses</b>	<b>Percentage</b>
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%

<b>% THEME</b>	<b>Number of responses</b>	<b>Percentage</b>
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

<b>% THEME</b>	<b>Number of responses</b>	<b>Percentage</b>
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%

<b>% THEME</b>	<b>Number of responses</b>	<b>Percentage</b>
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.”**

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## 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)

<b>% THEME</b>	<b>Number of responses</b>	<b>Percentage</b>
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%



<b>% THEME</b>	<b>Number of responses</b>	<b>Percentage</b>
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](http://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.

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

	<b>Proposed action</b>	<b>Strongly agree</b>	<b>Tend to agree</b>	<b>Neither agree nor disagree</b>	<b>Tend to disagree</b>	<b>Strongly disagree</b>
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](http://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              |

<input type="checkbox"/>	Asian or Asian British Bangladeshi
<input type="checkbox"/>	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



## Kent County Council response to the public consultation on proposed changes the designation and admission guidance for Kent’s special schools and a school-to-school support model.

The public consultation ran from 19 June 2024 to 14 August 2024. 1,351 responses were received to the consultation and this document provides KCC’s response to the feedback we received. The consultation report, which presents the analysis of the consultation responses, is available to read on the consultation webpage: [Special Schools Review: proposed changes to designations and admissions guidance | Let’s talk Kent](#).

The purpose of the consultation was to gain further feedback on a range of proposals in relation to the revised special school model, with a focus on ensuring the efficient use of resources for children and young people with Education, Health and Care Plans (“**EHCPs**”). The continued aim of the review is that KCC plans for and provides school places for children and young people with severe and complex special educational needs that is suitable and accessible, in or near to their local community to support them in preparation for independence in adulthood.

This is consistent with KCC’s statutory duties, including its duty to plan sufficient school places for all children with special educational needs and disabilities (“**SEND**”). As part of its programme to transform SEND provision across the county, KCC has planned special education provision for children across mainstream schools, specialist resource provision in mainstream schools (“**SRPs**”), and special schools.

The aim of planning special school places for children and young people with severe and complex special educational needs must be viewed alongside the ongoing work to improve educational provision for all children and young people with SEND.

In mainstream schools this is being addressed through the Countywide Approach to Inclusion, and by having clear and defined expectations for supporting children with SEND through KCC’s Mainstream Core Standards. A proposed new school-to-school support model is also intended to improve the SEN provision for children attending mainstream schools. In SRPs, places have been planned for children with special educational needs who have an Education, Health and Care Plan (“**EHCP**”), can potentially follow a mainstream curriculum with reasonable adjustments and/or adaptations and would be able to engage in some learning and or socialisation in a mainstream environment during their school career.

The initial recommendations presented to CYPE Cabinet Committee have been further developed following an analysis of the public consultation feedback

The table below shows the most frequently mentioned comments or concerns, with details of how KCC intends to take the comments on board and respond to any concerns. There are three main approaches (\*shown in column four) to be taken to the majority of comments raised:

1. Addressing misunderstandings: We've responded directly to any concerns based on misconceptions or misunderstandings.
2. Refining proposals: We have used your comments on the proposed changes to further refine and develop current and future proposals as part of the whole special school review.
3. Identifying gaps: Where comments or concerns have been given on areas which have already been identified as being a gap in provision by KCC and work is already underway with continued input from stakeholders.

<b>Section 1: Special school expectation statement</b>			
<b>Category of comment / concern</b>	<b>% of consultees answering</b>	<b>KCC Response</b>	<b>Approach*</b>
1.1 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%	<p>This is recognised. KCC is ensuring that all children and young people with SEND, across all levels of need, are being carefully planned for. A key focus of the Special School Review is to ensure KCC plans special school places for local children and young people with severe and complex needs, for them to have access to suitable education as close to their community as possible.</p> <p>In addition to this, KCC has identified a need to plan for the continuum of needs and provision to ensure all children and young people have access</p>	1 & 3

		to suitable education. This is part of the broader SEND system transformation programme, in which KCC is working with mainstream schools to develop local collective responsibility for children with SEND, to improve inclusive education in all mainstream schools. KCC has also reviewed the SRPs that are provided across some mainstream schools and has identified gaps, which it has a plan to address.	
1.2 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%	<p>While there are many examples of mainstream schools across Kent that have successfully made the necessary adaptations to ensure children and young people with SEND make good progress and achieve positive outcomes, KCC recognises that this level of support is not consistent throughout the county, which can lead to inequities in provision and a lack of parental confidence.</p> <p>As part of our ongoing work, KCC is working with mainstream schools to develop a shared understanding of the continuum of needs of children and young people with special educational needs and the expectations of provisions. These efforts are focused on strengthening local provision and ensuring that mainstream schools work in partnership to meet a wide range of needs.</p>	1&3

<p>1.3 Children's needs do not need to be severe / complex to be unable to cope in mainstream schools (e.g. sensory overload, MLD, those that mask / autistic / ADHD).</p>	<p>21%</p>	<p>This is recognised. Mainstream schools can be adapted to provide education for children and young people with a wide range of needs, but we know the current provision across Kent is inconsistent. Given the growing prevalence of children and young people who are neurodivergent, including those who may have autism and ADHD, KCC believes that all mainstream schools should be able to provide education for these children and young people where it is suitable. Work in this area is ongoing with the continued aim to improve the consistency of provision across all mainstream schools in the County. KCC want to shine a spotlight on the mainstream schools which are effectively meeting the needs for their pupils in this area and share their successful practices and strategies with other mainstream schools. The proposed new school-to-school-model of support will also help share the strategies and experience held in special schools across the wider education sector.</p> <p>We have identified that there are gaps in the SRPs which provide the opportunity to access specialist education in a mainstream environment. Plans are in place to address these gaps, particularly in secondary schools and specific</p>	<p>3</p>
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		<p>districts; these developments will be taken forward from 2026.</p> <p>It is KCC's view that we need to be ambitious for children and young people with SEND, providing pathways for them in mainstream schools that helps them develop skills and strategies for independence in adulthood, whilst planning special school places for children and young people with severe and complex special educational needs. This approach allows children to grow alongside their peers in their local communities.</p>	
<p>1.4 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.</p>	<p>19%</p>	<p>KCC agree that children and young people with severe and complex needs benefit from special school places where they can receive tailored support and resources that are not available in mainstream schools. KCC's approach is to ensure that these placements are made where they are suitable and most appropriate for the child or young person's individual needs, whilst also maintaining a focus on the overall equity of the educational system in Kent.</p> <p>KCC's work extends beyond special schools, aiming to improve the inclusion of children and young people with SEND in mainstream schools. KCC must also ensure that mainstream schools are supporting children and young people with varying levels of SEND. KCC is addressing this</p>	<p>1&amp;3</p>

		through several key projects including the Continuum of Needs and Provision, the Communities of Schools and the SRP Review.	
1.5 Mainstream schoolteachers / teaching assistants are not trained or experienced to support or cope with children with special needs.	18%	<p>The recommendation for a school-to-school support model will be built on the specialist expertise held by special school staff, enabling the sharing of knowledge and best practice with their mainstream colleagues. This aligns with the national direction of travel. While many mainstream school staff are already trained and experienced in supporting children and young people with SEND, KCC agrees that further work is required in this area to build on the substantial amount of training already provided for mainstream school staff which includes Autism Education Trust training, Inclusive Leaders of Education, Attention Autism and Nurture UK.</p> <p>As part of the Communities of Schools, KCC is developing a detailed implementation plan in collaboration with schools. This plan will outline the necessary training needed to further the skills and knowledge of staff, ensuring they are fully equipped to meet the diverse needs of children and young people with SEND. Communities of Schools will be implemented from September 2025.</p>	1&3
1.6 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	15%	The Special School Review is a key element of the broader SEND transformation programme. This on-going work includes exploring options for improving SRPs across the county as part of the	3

<p>forgotten / will exclude certain cohorts, including those with physical disabilities.</p>		<p>SRP Review and further work reviewing the pathway between alternative provision and mainstream schools. As part of the Communities of Schools, schools will work together to ensure that the needs of children and young people in their area are effectively addressed.</p> <p>Additionally, KCC has prepared an Accessibility Strategy which sets out how the local authority and its maintained schools currently ensure education is accessible for pupils with SEND. It sets out the steps we plan to take to increase access to the school curriculum, how we will improve the physical environment so that accessibility is not a barrier to disabled pupils or those with SEND, and how we will improve the delivery of information to disabled pupils which is readily available to those who are not disabled.</p>	
<b>Section 2: Proposed designation and admission guidance</b>			
<b>Category of comment / concern</b>	<b>% of consultees answering</b>	<b>KCC Response</b>	<b>Approach*</b>
<p>2.1 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.</p>	<p>34%</p>	<p>All placements for children and young people are made on an individual, case by case basis, to make the provision necessary to meet the child's needs. KCC is required to secure placements that are suitable for children, including complying with</p>	<p>1&amp;3</p>

		<p>parental preferences for school placements unless a statutory exception applies.</p> <p>KCC and NHS England have recognised the necessity for a new approach to early intervention for children and young people who are neurodivergent in mainstream schools. KCC and NHS England are part of the national programme, Partnerships for Inclusion of Neurodiversity in Schools (PINS). Learning will be taken from that programme and will be applied more widely across Kent in the future.</p> <p>KCC recognise that many respondents to the special school review public consultation lack confidence that children and young people with neurodiverse needs can thrive or have their needs met in a mainstream school. To address this, we are working with Kent PACT to shape the future provisions for these children and young people in mainstream schools. These changes would be put in place at least a year before any changes were to be made to the type of SEN provided for at any special school.</p>	
2.2 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	27%	As answered in section 1.1	1 & 3



children / including those with less complex needs / those with challenging needs.			
2.3 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%	If the proposed changes from this consultation are agreed, they would apply to admissions from September 2026 and would apply only to children and young people entering a special school placement from that date onward. The changes would be introduced gradually, year on year. Children already enrolled in special schools will continue to attend their current schools, with the process for their continued attendance remaining unchanged. Their needs and the suitability of their school placement will continue to be reviewed and considered through the annual review of their EHCP, as it does now.	1
2.4 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%	The proposed change to designations and admission guidance across the special schools is intended to improve the accessibility of support across the county. This is by providing local special school access for children and young people in their local communities, reducing the need of significant travel. Following the consultation there has been development on the proposed admission guidance for the proposed designation of Neurodivergent and Learning Difficulties.  Currently there is only one school catering to children with physical disabilities and complex medical needs; there are children and young	1,2 &3

		<p>people across the county with those needs which limits access for many children and young people unless they live nearby or can attend as residential students. This precludes a significant number of children and young people from attending the school. The children and young people that have been precluded from accessing this one school have had their needs met in Profound, Severe, Complex Need (PSCN) schools closer to where they live. The intention of broadening this designation is that all children and young people with severe and complex special educational needs can attend a school that is local or as near as possible to their local community.</p> <p>With regards to children and young people currently admitted to Communication and Interaction (C&amp;I) schools, current admissions guidance used by these schools excludes those who are not attaining within two years of their chronological age. This has resulted in situations where KCC is providing an education for a child or young person in a special school who is attaining within the expected age range and KCC considers could suitably be educated alongside peers in mainstream schools. Meanwhile other children and young people with severe and complex special educational needs who require an adapted</p>	
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		<p>curriculum beyond which can be provided at a mainstream school are unable to access a special school placement or have been placed in a mainstream school.</p> <p>KCC is undertaking an extensive program to establish a common understanding of the continuum of needs and provision for children with SEND across all schools in the county. KCC will make suitable provision for all children and young people with SEN, including by planning special school placements for children and young people with severe and complex needs in special schools, and ensuring that those who are attaining within the range expected for their age can receive suitable and appropriate education in mainstream settings and/or SRPs, adapted where necessary.</p>	
<p>2.5 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.</p>	12%	<p>There is a need for greater equity across the education system.</p> <p>KCC has invested in supporting children and young people with physical disabilities across all schools through their specialist teaching and learning service for physical disabilities.</p> <p>There is expertise across the entire special school system in relation to physical disabilities and complex medical needs. Across the county there are children and young people with physical</p>	1 & 3

		<p>disabilities and complex medical needs in all of the PSCN schools. Children and young people should be able to go to their local school and that school should have the skills and expertise needed to meet their needs.</p> <p>Teaching staff at special schools have valuable expertise in curriculum adaptation and monitoring the progress of children and young people with SEND. If special schools work together, they can gain knowledge about specific interventions, though their skills in curriculum adaptation are generally transferable to different groups of children and young people. The key areas of expertise involve how to adapt the curriculum, assess individual needs and monitor progress.</p> <p>KCC expects special schools to work together, to develop their knowledge and skills on specific interventions they may or may not have experience of previously. This aligns with the broader approach of partnership working between schools. This model is intended to enable staff in both special and mainstream schools to develop the skills and expertise that is right for their school.</p>	
2.6 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	12%	KCC follows the guidance of the Code of Practice. Each child or young person's unique needs are carefully considered through the Education Health and Care needs assessment process and when	1&3

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).		determining the placement to name in Section I of an EHCP. We are committed to our continued development of the Continuum of Needs and Provision to improve clarity and ensure a shared understanding between parent/carers, schools, and Local Authority staff. We recognise that further engagement is needed to clearly communicate the specific support available to children and young people with SEND. A collaborative approach will continue to take place with this work with key stakeholders.	
<b>3. Proposed Implementation</b>			
<b>Category of comment / concern</b>	<b>% of consultees answering</b>	<b>KCC Response</b>	<b>Approach*</b>
3.1 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%	As answered in section 2.3	1
3.2 Citing the changes must not go ahead / do not agree to any of this.	22%	KCC acknowledges that the special school sector underwent significant changes in 2001 as a result of the previous Special School Review. Although the changes implemented following the previous review were suitable for that time, there is now a need to review and plan for the future. Since the previous review there have been a number of ad hoc changes to special schools which have led to inequity and variability in the access that parents and children and young people have to specialist places across the county. KCC need to plan for	1,2 & 3

		<p>there to be equitable access to specialist education taking account of population changes and the change in pattern of children and young people's special educational needs. Establishing a foundational system capable of adapting to these challenges is essential to consistently meet the diverse needs of children and young people in Kent.</p> <p>KCC will continue to collaborate with parent and carer groups, as well as special school communities, to provide timely information and improve communication. Feedback throughout the consultation period has highlighted the need for more open and direct dialogue between KCC and our special school communities, and KCC is now developing a more regular and formal engagement process to address this need.</p>	
3.3 Belief there is not enough time to get everything in place / huge changes to settings / infrastructure / resources / recruitment / training	13%	KCC acknowledges that there is change being proposed across the SEND educational sector. However, these changes across the transformational projects and reviews outlined are being planned in a coordinated manner with projects aligned to implement the necessary adjustments at the appropriate time. This strategic system wide approach ensures that the transition is managed effectively and that improvements are made in a timely organised way. If KCC's	1,2&3

		proposals are approved in due course, an implementation plan for any changes arising from the special school review will be developed further in partnership with schools. KCC is keen to work with parents of children and young people in special schools and special school leaders.	
3.4 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%	As answered in section 2.3	1
<b>4. Proposed school-to-school model of support</b>			
<b>Category of comment / concern</b>	<b>% of consultees answering</b>	<b>KCC Response</b>	<b>Approach*</b>
4.1 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%	<p>Some special schools in Kent are already effectively collaborating with their mainstream school colleagues to share knowledge and expertise. KCC aims to build on this successful practice by expanding this framework to include all special and mainstream schools.</p> <p>The proposed model of school-to-school support compliments and will build on the local communities of schools and professional resources associated with these communities as these develop and evolve from September 2025 as part of the Communities of Schools Model (previously termed the Locality Model for Special Educational Needs Inclusion).</p>	1,2& 3

4.2 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%	<p>A need for additional special school places to address population growth in specific areas of Kent was identified leading to successful bids to the Department for Education (DfE) under the Safety Valve agreement. As a result, the following new special schools are due to open:</p> <ul style="list-style-type: none"> <li>• Swanley Free Special School: Designated for pupils with PSCN, providing 250 places. Initial proposed opening: September 2026, but confirmation of opening date is awaited.</li> <li>• Whitstable Free Special School: Designated for pupils with PSCN, providing 120 places. Initial proposed opening: September 2026, but confirmation of opening date is awaited.</li> <li>• Estuary (formerly Nore) Academy: Designated for pupils with Social, Emotional, and Mental Health (SEMH) needs, providing 120 places. Proposed opening: January 2025.</li> </ul> <p>This alone is not sufficient to address the issues and challenges detailed in the consultation. KCC has developed the proposed changes to work alongside the additional special school places.</p>	1&2
4.3 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%	As answered in section 1.5	1&3
4.4 Funding: where is the funding for this? This will need funding / investment.	19%	KCC recognises that some special schools are already providing support to their mainstream peers within their current budgets. The feedback from mainstream schools who have received this	1&2



		support has been positive. It is KCC's intention to build on this approach and develop it further working in collaboration with schools across the mainstream and special sector.	
<b>5. Any comments about suggested designations for specific special schools</b>			
<b>Category of comment / concern</b>	<b>% of consultees answering</b>	<b>KCC Response</b>	<b>Approach*</b>
5.1 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%	As answered in section 2.5	1&3
5.2 Disagree with the changes to designations / deeply concerned about these changes.	17%	As answered in section 3.2	1,2 & 3
5.3 Lack of consultation / co-design with schools, parents, children, teachers, experts / listen/ lack of detail and evidence.	17%	Since the inception of the special school review in November 2022, a variety of methods have been used to collect views and feedback on key issues and potential solutions from key stakeholders including special and mainstream schools, parent/carers and children and young people with SEND. This process has enabled us to better understand the current situation of the special school sector and the needs of children and young people requiring special school support in Kent. A range of local and national data sources have been used to inform the proposed changes are based on evidence and input from stakeholders. KCC is continuing to engage with stakeholders to inform future developments and will continue to do so over the period of implementation.	1

		This consultation is a key step in our ongoing journey to gather and review feedback from key stakeholders and this has been used to develop the proposed changes and implementation plan to the special school model	
5.4 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%	As answered in section 1.1	1&3
5.5 How will this be funded? Special schools have received no info on how they'll be funded. This will need huge funding.	15%	<p>Special school funding was last reviewed in 2010. KCC acknowledged the model needed updating and the special school review has taken the feedback from stakeholders to inform a set of principles.</p> <p>The work carried out with schools across the sector to develop the Continuum of Needs and Provision will inform a tariff model which will be consulted on through Schools Forum. This process will allow all schools to have the opportunity to give their views.</p>	1&3
<b>6. Any other comments about proposed changes</b>			
6.1 Proposed changes are not about the children / proposals are failing the children / cruel.	30%	All children and young people are at the heart of KCC's plans for both the special school review and wider elements of the SEND transformation programme. KCC aims to support them in achieving their potential while living healthy and safe lives ensuring they feel seen and included. A key focus is on preparing all children and young people for adulthood within or close to their communities.	1

6.2 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%	As answered in section 2.1	1&3
6.3 Children in specialist schools are there for a reason / they will not cope if moved to a mainstream school.	20%	As answered in section 2.3	1
6.4 This is about budget / funding cuts / safety-valve is a cost-cutting exercise.	17%	The special school review is an important part of KCC's efforts within the Safety Valve Programme to stabilise the Local Authorities financial situation. A key focus is reducing KCC's dependence on the independent private sector to generate the necessary savings. However, the special school review goes beyond this, it also seeks to address deeper structural issues in the planning and organisation of KCC's special education provision which hasn't been updated since 2001. Through the special school review KCC aims to ensure equitable access to SEND provision that meets the needs of all children and young people who need it, including by planning special school placements for children and young people with severe and complex SEND that is in or near to their local communities. This requires Kent's special school education system, and mainstream SEND provision, to evolve to meet the current and future needs of children and young people with SEND.	1
6.5 Placing SEND children in mainstream setting will affect their well-being / mental health / traumatise them.	17%	When a child has an EHCP each case is looked at on the basis of their individual needs and circumstances, and in accordance with the	1

		<p>statutory scheme. That will continue to be the case as KCC's special educational needs provision evolves.</p> <p>Not all children and young people with SEND need to attend special schools to access a suitable education. Children and young people with SEND are currently placed in mainstream schools in Kent, and these schools adapt their curriculum to support the inclusion of SEND students. KCC acknowledges that this has not always been the experience for all children and young people with SEND in the county. The changes proposed as part of the Special School Review, along with the Continuum of Need and Provision, the Communities of School Model (previously termed the Locality Model for Special Educational Needs Inclusion), the SRP Review, Kent Sufficiency Plan, and Accessibility Strategy, are aimed at improving the equity and quality of provision for all children and young people with SEND, including in mainstream schools.</p>	
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## Conclusion

### *Further information and next steps*

An issue has been raised by representatives of an Academy Trust that by proceeding with the proposed designations, Kent County Council may be discriminating against young people with special educational needs who are studying for GCSEs. KCC does not consider that our proposals discriminate against children and young people with SEN who are studying for GCSEs, as KCC believes young people with an EHCP will be able to appropriately do so in improved and suitable mainstream and SRP settings, with adaptations as necessary. This approach aligns with KCC's broader strategic aims and ensures adequate support is available

before the proposed changes to the special school sector would be implemented. This will allow planning for special school placements for children and young people with severe and complex needs.

During the academic year 2023/24 head teachers of mainstream schools were invited to sessions lead by a mainstream senior school leader working in partnership with KCC to establish the range of needs that mainstream schools currently provide education for to inform the development of a different approach to meeting children's needs through a continuum of provision and a commitment to local collective responsibility for children with SEND within the financial resources available.

As part of this ongoing process, scheduled to conclude in spring 2025, KCC discovered considerable variation in how schools interpret and define levels of special educational need. Most schools involved in the review had differing perspectives on what constitutes a severe or complex special educational need. Therefore, KCC, in collaboration with schools across mainstream, SRP, and special school sectors, shifted its focus to curriculum adaptation levels at each provision type, assessing whether each provision type can efficiently support an adapted curriculum.

What became apparent during the meetings between Local Authority officers and schools was that all mainstream schools are providing education for children with autism. Many mainstream schools are providing education for children whose learning is significantly more delayed than the two-year gap currently specified for the admission of children to some special schools and doing so effectively, making an efficient use of the resources available and enabling students to make progress towards adulthood with peers in

We note that the consultation highlighted a lack of confidence among parents and carers of children and young people with autism regarding the special educational needs system. To work towards resolving this we recognise the importance of increasing our engagement with this group of parents and carers. We will look to work with them in the future to clarify existing pathways, involve them in our proposed developments and demonstrate how their feedback is incorporated into KCC's planning. The concerns raised about provision available for children and young people that are Neurodivergent and/or Autistic highlights the need for a cohesive strategy that integrates our initiatives with existing provisions from NHS partners. KCC is committed to developing a clearer, more consistent neurodevelopmental pathway, ensuring families have a clear understanding of available resources and support in their local community.

Following full analysis of the consultation feedback, we propose to move to the next stage of KCC's decision-making process for changes to the SEND designation (i.e. the type of SEN provision made) and accompanying admissions guidance for particular special schools in Kent to be considered.

The full analysis, response and next steps are being taken to the Children, Young People, and Education Cabinet Committee in November 2024 for discussion and comment before a decision is taken by the Cabinet Member for Education and Skills in relation to the proposed changes.

## Appendix 4: Equality Impact Assessment



EQIA Submission Draft Working Template  
Information required for the EQIA Submissions App

### EQIA Submission Draft Working Template

If required, this template is for use prior to completing your EQIA Submission in the EQIA App.

You can use it to understand what information is needed beforehand to complete an EQIA submission online, and also as a way to collaborate with others who may be involved with the EQIA.

Note: You can upload this into the App when complete if it contains more detailed information than the App asks for, and you wish to retain this detail.

### Section A

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

The Special School Review

#### 2. Directorate

Children, Young People & Education (CYPE)

#### 3. Responsible Service/Division

Education and SEND

### Accountability and Responsibility

#### 4. Officer completing EQIA

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

Nareece Dearsley – Programme Officer

#### 5. Head of Service

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

Craig Chapman - Assistant Director Fair Access and (Interim) SEN Processes

#### 6. Director of Service

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

Christine McInnes – Director of Education and SEN, CYPE

### The type of Activity you are undertaking

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

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

Yes

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

Yes

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

<b>Yes</b>
<b>Commissioning/Procurement</b> – means commissioning activity which requires commercial judgement. Answer Yes/No
<b>No</b>
<b>Strategy /Policy</b> – includes review, refresh or creating a new document. Answer Yes/No
<b>Yes</b>
<b>Other</b> – Please add details of any other activity type here.
<b>8. Aims and Objectives and Equality Recommendations</b> – Note: You will be asked to give a brief description of the aims and objectives of your activity in this section of the App, along with the Equality recommendations. You may use this section to also add any context you feel may be required.
<p>In response to the outcome of the Ofsted Local Area SEND Inspection 2019 and the need to address identified weaknesses in SEND provision, KCC has planned whole system transformation for SEND children. KCC entered into a Safety Valve agreement with the DfE in May 2023. The DfE Safety Valve Programme is designed to eliminate KCC’s deficit in its Dedicated Schools Grant by the end of 2027-2028. By this agreement with the DfE, KCC has agreed to implement a DSG management plan. This includes action to implement a countywide approach to “Inclusion Education”, by improving the SEN offer in mainstream provision (which is also the subject of a separate consultation) and by ensuring there is sufficient and consistent capacity across the county to support children with severe and complex needs in their local area where possible. Part of this programme includes KCC reviewing the specialist education continuum to ensure it plans for children and young people with severe and complex special educational needs are supported in special schools. The Safety Vale agreement allows Kent to return to a position that fulfils its statutory duty to provide SEN support within the financial envelope provided to KCC in a sustainable and measured manner.</p> <p>To ensure the provision of state-funded special school places for children with severe and complex special educational needs and disabilities (SEND), a review of state-funded special school provision was conducted from November 2022 until present. This review, led by KCC officers, aimed to analyse and improve the strategic planning of state-funded special school places. The review assessed whether the current special school provision enabled KCC to consistently make placement decisions for all children with an EHCP ensuring the efficient use of resources, that met statutory duties and suitability of education with a focus on the duty to plan children’s special educational needs provision to support preparation for adulthood.</p> <p>The purpose of the review was:</p> <ul style="list-style-type: none"> <li>• To inform planning of special school places over the medium-long-term for children with Special Educational Needs and Disabilities (SEND) for whom KCC maintains an Education, Health and Care Plan (EHCP) and decides to place in a special school.</li> <li>• To inform the designation and admission guidance for special schools so that there is clarity about the special</li> </ul>



educational needs and disabilities (SEND) of children and young people for whom the Local Authority has planned special school provision and equity of access for children and young people with severe and complex SEND.

- To inform the principles of funding to ensure a financially sustainable approach to funding state-funded special schools, with funding matched to the level of adaptation and resources needed to provide suitable education for the children placed by KCC.
- Identify opportunities for strategic system change to improve SEND provision, enhance educational outcomes, and promote inclusivity for children and young people with severe and complex needs in their local communities.
- Propose options for the future that foster collaboration towards building a more equitable and effective educational landscape for all children in Kent.

Two Ofsted and Care Quality Commission (CQC) Local Area SEND Inspections in 2019 and 2022 identified significant weaknesses, with minimal progress noted during the revisit in 2022. These weaknesses were found to adversely affect parent and carer confidence in the Local Authority's capabilities leading to frustration, distrust and dissatisfaction with the support provided by Kent. Concurrently, there has been a substantial increase in spend of the High Needs Funding (HNF) block over the past five years, resulting in a projected cumulative deficit of £660 million by the financial year 2027/2028 if not addressed.

The Department for Education (DfE) has initiated the Safety Valve Programme, aimed at authorities with the highest dedicated schools grant funding deficits, including Kent. This programme provides funding to mitigate existing and forecasted overspends on HNF, contingent upon councils reviewing their high needs systems to ensure sustainability and alignment with pupil needs. Kent's participation in the Safety Valve Programme, formalised in March 2023, entails implementing various measures, including:

- Implement a countywide approach to 'Inclusive Education' to build capacity in mainstream schools to support children and young people with SEND, thus increasing the proportion of children and young people in mainstream education, improving outcomes for children with SEND educated in mainstream schools and reducing dependence on specialist provision.
- Introduce a robust SEN offer for early years following a review which explores alternatives to special school admission before Key Stage 2, SEN service Redesign and the implementation of Countywide Approaches to Inclusive Education (CATIE) to support a consistent mainstream offer which includes leadership development programmes, peer review and a core training offer focused on priority groups of children including those who are neurodivergent or have a diagnosis of autism.
- Review the system of EHC Plan assessments and annual reviews to ensure robustness, transparency and consistency, through the use of consistent guidance and practice frameworks.

- Implement models of reintegration of children and young people from special/independent schools to mainstream where needs have been met and the outcome of independence in adulthood can be better achieved through a mainstream education pathway.
- Develop a robust post-16 offer across the county with clear pathways to independence for children and young people with SEN, through increased post-16 opportunities for preparing for adulthood.
- Develop the Transition Charter to increase parental confidence in Kent's provision. This involves working with schools to enable them to articulate the provision pathways for parents clearly and provide support to both parent/carers and children/young people at key transition points (e.g. nursery to reception; primary to secondary and post 16 (Year 12) to FE College).
- Ensure there is sufficient and consistent capacity across the county to support children and young people with severe and complex needs in their local area where possible. This includes the recruitment of temporary posts to support sufficiency planning, reviewing the use of Specialist Resource Provision (SRP) and the specialist continuum to ensure only the most severe and complex needs are supported in special schools.
- Develop a school/area-led approach to commissioning of SEN support services (Locality Based Resources) to better respond to the needs of children and young people with SEND.
- Continue working closely with NHS Kent and Medway to ensure a common understanding of SEND needs, including the drivers behind increases in need, ensuring clarity of clinical assessment and subsequent funding associated.

Prior to 2018, KCC's data was broadly in line with national data, but by the time of the 2019 inspection, KCC's data showed rapidly increasing placements in special schools and an associated deviation from national data both in relation to the percentage of the child population for whom an EHCP is maintained and, the percentage of children placed in special schools, a trajectory of increases which has continued.

The review which focused on the 24 state-funded special schools in Kent, found that Kent has an over-reliance on placement of children with SEND in the special school sector according to national data (please visit section 11 to access data links). State-funded special schools are at capacity and consequently placements have been made in private schools. This is not an efficient use of resources, is not financially sustainable and prevents the Local Authority from planning effective and sustainable approach to funding and the provision of special educational needs teaching and learning for those with the most complex and severe SEND in state-funded special schools.

The review of special schools across Kent has identified the following areas of focus, where change will drive the improvements to state-funded special schools that are required to increase parental confidence in the educational provision for children and young people with SEND and improve outcomes for these children and young people. These are:

- Sufficiency of state-funded special school places

- Designation and admission guidelines
- Principles for the special school funding model
- The role of special schools supporting the inclusion of children and young people with SEND.

The special school review is looking to develop transparent and consistent designation and admission guidelines across the county that will support KCC in planning special school placements for children and young people with an EHCP who have severe and complex SEND as close to their local community as possible, to ensure their educational needs are met in schools that can provide suitable education in an efficient manner. KCC is working in conjunction and collaboration with special school headteachers, stakeholders, internal finance and SEN officers, and NHS health colleagues to create an effective framework that will align with regional and national changes.

The purpose of this Equality Impact Assessment is to assess the potential impact on persons with protected characteristics. In undertaking this assessment, the Local Authority has had due regard to the need to:

- a. Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- b. Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
- c. Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

KCC has considered the proposed changes alongside each of the three equality needs as outlined below.

#### *The need to eliminate discrimination*

By the proposals, KCC will improve its strategic planning of state funded special school places for children with severe and complex needs to better meet their needs in an efficient manner, whilst also making provision for those with less complex needs, including pupils who will follow a GCSE pathway, by improving SEND provision and making reasonable adjustments and adaptations in mainstream schools and SRPs. All children and young people will continue to have their special educational needs met, and KCC will continue to comply with Part 3 of the Children and Families Act 2014. No child will be treated less favourably because of their disability or for a reason related to their disability.

If the changes proposed would place some children at a particular disadvantage compared to others, KCC considers :

- (i) They are rationally connected to KCC's aim – the designation / admission guidance of particular schools will change so that places at special schools are planned for children with severe and complex needs in their local area.
- (ii) There are no less intrusive measures – to continue with current practice will lead to ever increasing financial deficit, and many children and young people with severe and complex SEN will

- (iii) continue to face long travel distances to get to an appropriate school outside their local area, or be outside school altogether
- (iii) There are proportionate – KCC believes that children with less severe or complex needs should be able to have their needs met in mainstream schools and /or SRPs, which are developing their SEND inclusive practice and implementing reasonable adjustments. If needs cannot be met, there is a legal route to appeal to the Tribunal for a placement in a special school.

KCC must take reasonable steps to avoid disadvantage. Work has been underway for several years preceding the special school review to strengthen SEND inclusion in mainstream schools and SRPs. When special school placements are planned for pupils with severe and complex needs, this will ensure every child and young person can have their educational needs met in a suitable and appropriate educational setting. If any parent considers that their LA offered school does not meet needs of their child, they can engage in mediation and where this does not result in agreement, appeal to the tribunal.

Kent already has more children and young people attending a special school than the national average. The only alternative methods of the LA exercising its commissioning function is to open additional special schools. There is no funding to take this action beyond those new schools already identified in the consultation and it will not be necessary do this if needs can be met in mainstream schools.

No potential areas of indirect discrimination for any particular group have been identified in the development of, or during the consultation. This area will continue to be actively monitored and the EqIA will be updated where necessary. SEN legislation provides opportunities for independent appeal for all Local Authority decisions, including placement, which allows for targeted mitigation for all individuals where disadvantage can be evidenced.

#### *The need to promote equality of opportunity*

The protected characteristic of disability is addressed below.

Race – Pupils in Kent with an EHCP are predominantly White British and so we would expect this to be the ethnic group most impacted. As the changes planned are for new children entering special schools from September 2026 and there will be appropriate provision for all children and young people with SEND to attend an education setting that is suitable for their needs, KCC does not believe the change will be detrimental to White British pupils, or particularly disadvantage pupils from any other group.

Sex – Pupils in Kent with an EHCP are approximately 2/3 male and 1/3 female so KCC anticipates boys may be most impacted by the proposed changes. As the changes planned are for new children entering special schools from September 2026 and there will be appropriate provision for all children and young people with SEND to attend an education setting that is suitable to their needs, we do not believe the change will be detrimental to male pupils.

The proposals will promote equality of opportunity by strategically planning places for children with severe and complex SEN at special schools. It is anticipated that children and young people with the most complex needs will have their needs met in special school, in their local area. Places will be available to those who need them most.

The consultation responses have identified a fear that the proposed changes will not advance equality of opportunity, because the needs of certain children would not be met in a mainstream school. However, KCC will comply at all times with its statutory duties under Part 3 of the Children and Families Act 2014. If a parent requests a particular special school placement, KCC will be under a duty to give effect to that parental preference unless the school is unsuitable for the needs of the child, it would be incompatible with the efficient education of others, or incompatible with the efficient use of resources. A child or young person would only be placed or remain in a mainstream school if KCC is satisfied that adequate and suitable provision can be provided to meet the child or young person's special educational needs. If there is any dispute about this issue, the parents (or young person) have a right of appeal to the First-tier Tribunal, which will determine the school to be named in Section I of the EHC Plan.

KCC is continuing work to make mainstream schools more inclusive, and better able to meet the needs of children with SEND as part of the communities of schools model (previously termed Localities Model). The proposed changes and development of a school-to-school support model will also assist in this objective by fostering shared expertise, resources and inclusive practices. This proposed collaboration aims to enable mainstream schools to better support diverse learning needs. It is proposed special schools contribute their specialised knowledge and strategies, which mainstream can then adapt to benefit their cohort of students creating a more inclusive environment across Kent.

### *Foster good relations*

The proposals will:

- foster good relations between disabled children and those who are not disabled, as more disabled children will be educated in mainstream schools if suitable SEN provision can be suitably provided there.
- support the intention to keep more children in maintained schools if suitable SEN provision can be provided. This advances objectives B and C as it avoids disparate or different services being provided for children with protected characteristics and without. It also promotes the integration of children with different characteristics.

KCC acknowledges that there may be a fear that the proposed changes would not advance equality of opportunity if there were concerns that children's needs would not be met in a mainstream school. As part of our ongoing work, KCC is working with mainstream schools to develop a shared understanding of the continuum of needs of children and young people with special educational needs and the expectations of provisions. These efforts are focused on strengthening local provision and ensuring that mainstream schools work in partnership to meet a wide range of needs.

Following the public consultation the equality impacts of the proposed changes have been assessed considering the views expressed by the respondents. KCC is taking a phased approach to its decision on whether or not to make changes to the designations (i.e. type of SEN provision) for special schools in Kent. The equality impacts of any proposed changes will continue to be considered and kept under review before a final decision is taken whether or not to make changes to the designations of particular special schools.

## Section B – Evidence

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

Yes, data can be accessed via the links below:

- [Academic Year 21/22 Special Educational Needs in England](#): This publication combines information from the school census (state-funded schools), school level annual school census (independent schools) and general hospital school census on pupils with special educational needs (SEN) for the academic year of 21/22.
- [Academic Year 22/23 Special Educational Needs in England](#): This publication combines information from the school census (state-funded schools), school level annual school census (independent schools) and general hospital school census on pupils with special educational needs (SEN) for the academic year of 22/23.
- [Education statistics: Education, health and care plans](#): This publication provides data on children and young people with an education, health and care (EHC) plan in England and, historically, for those with a statement of special educational needs (SEN). The publication is based on data collected in the SEN2 data collection. From the reporting year 2023 (as at January 2023, 2022 calendar year), the data collection changed from aggregated figures at local authority level, to a person level collection.

As KCC is not proposing to change historic placement decisions for children already attending Special schools, it has not identified whether current attendees would be offered a place under proposed future admissions guidance. These pupils will continue to be educated within existing settings until a normal transition point, at which time their needs will reviewed via the appropriate statutory mechanism. KCC will continue to place children in the most appropriate setting for their need, so trends in future placement will be monitored to ensure that proposed plans provide a suitable environment to meet this aim. The EQIA will be updated accordingly to reflect any developments in this area.

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

Yes

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

Yes, data can be accessed via the links below:

- [Academic Year 21/22 Special Educational Needs in England](#): This publication combines information from the school census (state-funded schools), school level annual school census (independent schools) and

general hospital school census on pupils with special educational needs (SEN) for the academic year of 21/22.

- [Academic Year 22/23 Special Educational Needs in England](#): This publication combines information from the school census (state-funded schools), school level annual school census (independent schools) and general hospital school census on pupils with special educational needs (SEN) for the academic year of 22/23.
- [Education statistics: Education, health and care plans](#): This publication provides data on children and young people with an education, health and care (EHC) plan in England and, historically, for those with a statement of special educational needs (SEN). The publication is based on data collected in the SEN2 data collection. From the reporting year 2023 (as at January 2023, 2022 calendar year), the data collection changed from aggregated figures at local authority level, to a person level collection.
- [DfE and Kent Safety Valve Agreement](#): This publication outlines the agreement between Department for Education and Kent County Council, and covers the financial years from 2022-23 to 2027-28.
- [SEND Ofsted and CQC inspection information](#) : This publication sets out Ofsted and the Care Quality Commission (CQC) joint inspection of KCC to judge the effectiveness of local areas in implementing the disability and special educational needs reforms as set out in the Children's and Families Act 2014.
- [SEND and AP Improvement Plan](#): This publication outlines KCC's improvement plan (called an Accelerated Progress Plan) shows the changes and improvements we will be making for each of the nine areas of weakness.

## 12. Have you consulted with Stakeholders?

Answer: Yes/No

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

Yes

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

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

KCC has engaged with stakeholders through newly established methods including stakeholder reference groups, task and finish groups, focus groups and workshops to support in creating the proposals, including:

- Headteachers and Business Managers from special schools (maintained, academies and private educational settings)
- Mainstream Headteachers and SENCOs
- Chairs of Governors
- NHS Kent and Medway
- Internal KCC staff
- Kent PACT (Parent and Carers Together) forum

- Parent and Carers
- Children and young people with SEND
- External advisors

Regular meetings between Local Authority officers and special school headteachers meetings were established during the review and scheduled three times a year to foster and maintain a close working relationship with this key stakeholder group. The meetings serve as a platform to share strategic priorities and plan together to ensure efficient processes and a shared understanding of issues. These meetings provide a forum for shared problem-solving and planned development and agenda items are informed by stakeholders. The meetings are important in facilitating the cultivation of a close and collaborative working relationship. Additionally, the Local Authority carried out a public consultation between June 19 and August 14 to gather feedback from the wider community on the proposed changes. If the proposals are agreed, ongoing engagement with key stakeholders, including special and mainstream schools, children and young people with SEND and their families to develop a transition and implementation plan.

**14. Has there been a previous equality analysis (EQIA) in the last 3 years?**

*Answer: Yes/No*

Yes – SEND Service wide which included the special school review. This is the first EqIA relating solely to the special school review.

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

*Answer: Yes/No*

Yes, we have data that shows commissioned special school places by area and in the future, this will be aligned with population projection and national data. In respect to this further work is planned to take place.

**Uploading Evidence/Data/related information into the App**

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

[Special educational needs in England, Academic year 2023/24 - Explore education statistics - GOV.UK](#)

This publication combines information from the school census (state-funded schools), school level annual school census (independent schools) and general hospital school census on pupils with special educational needs (SEN).

**Section C – Impact**

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

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

Yes

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

Yes

Staff/Volunteers - *Answer: Yes/No*

Yes



**17. Are there any positive impacts for all or any of the protected groups as a result of the activity that you are doing? Answer: Yes/No**

Yes

**18. Please give details of Positive Impacts**

1. Children and young people have their educational needs met within the most appropriate setting.
2. Children and young people with SEN achieve their potential academically, gaining skills, knowledge, and confidence to live independently within their local communities.
3. An increased number of children and young people with SEN have access to high-quality inclusive education within mainstream settings (where this is appropriate to their needs).
4. The increased availability of places at Kent's special schools, which KCC expects to be achieved by these proposed changes, will enable more pupils with severe and complex needs who require a special school placement to be accommodated, and these pupils will be more likely to attend a special school closer to their home thereby reducing travel times.
5. Local communities thrive due to the diverse presence of children and young people with special educational needs (SEN) and gain a deeper understanding of differences, fostering inclusivity and an appreciation for diversity.
6. Children and young people experience positive transitions between key stages of education facilitated by consistent support and opportunities within the educational settings within their local communities.
7. Parents and caregivers will gain a clearer understanding of the educational settings where their child is eligible to attend, facilitating informed decision-making regarding their child's education.
8. Parents and carers are assured that their child or young person's educational setting has the requisite knowledge, skills, and confidence to understand and meet their education, health and care needs.
9. Staff in mainstream schools can leverage the specialised knowledge and expertise of special school staff, establishing a peer-to-peer network to facilitate the sharing of best practice. This collaborative approach ensures that the needs of the children and young people with SEN are effectively met resulting in longer-term progress towards improved countywide outcomes for the cohorts.
10. The availability of space at a state-funded special school will ensure the Local Authority meets duties to ensure value for money and the efficient use of resources, by enabling placement of new pupils in a cost-effective manner avoiding the need for placement in private schools.

**Negative Impacts and Mitigating Actions**

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

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

**a. Are there negative impacts for Age? Answer: Yes/No**

*(If yes, please also complete sections b, c, and d).*

Yes; although it is not possible to determine the number of children who may be affected, as this would be determined on a case-by-case basis through each child's annual review.

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

1. School children with an EHCP aged (4-19 years old) will be disproportionately impacted by the proposals as the proposed changes aim to ensure that special school places are made for children and young people with severe and complex special educational needs.
2. Children and young people currently enrolled in a special school setting will remain on the school's roll, with review of their special educational needs, provision and school placement made annually through the annual review of their EHC Plan as currently is the case.
3. The proposed changes aim to decrease the number of children and young people who are placed in private special school placements from September 2026 and over time, for new children being enrolled into educational settings. Therefore, the younger cohort in the identified age bracket may be disproportionately impacted by the review as this will be a key transitional phase where the SEND service will look to ensure more children who can be appropriately supported in a mainstream setting are placed in this type when they are considered for placements for starting primary school and at transition to secondary school. This should mean that in time more children at this age will remain placed in a mainstream setting, where a mainstream school is able to meet their SEND needs, creating capacity in state funded special schools for children with the most complex needs and reducing the current reliance, that there is in Kent, on private special school placements.

**c. Mitigating Actions for Age**

1. Every child will be placed in accordance with the Children and Families Act 2014. All parents and/or young people will be able to request a particular school, and KCC will remain under a duty to give effect to that requested school unless the exceptions in section 39(4) are met. If a parent requests a special school, a child could only be placed in mainstream / SRP if the mainstream/SRP placement is able to meet their special educational needs, and a special school place would be incompatible with efficient education of others, and/or efficient use of resources.
2. A child or young person would only be placed/remain in a mainstream school if KCC is satisfied that adequate and suitable provision can be provided to meet the child/young person's special educational needs. KCC will follow statutory framework and Code of Practice, and every child will continue to have their special educational needs met.
3. There is a right of appeal to the First-tier Tribunal if parents/young person disagrees with the school named in Section I of the EHCP
4. Ensure timely planning for children with an EHCP, so that there is better communication with parents, and decisions are made that support children accessing suitable education between type of education provision,

<p>including from mainstream to mainstream or special to mainstream and/or special to special schools</p> <p>6. If the proposed changes proceed, there will be a carefully planned transition period that KCC will develop in collaboration special and mainstream school Headteachers, health partners, parents, carers and children and young people with SEND.</p> <p>7. If implemented, KCC will keep the impact of the changes under review, and will continue to monitor and analyse data regarding the impact of the proposed changes on all protected groups</p>
<p><b>d. Responsible Officer for Mitigating Actions - Age</b></p>
<p>Assistant Director Fair Access and (Interim) SEN Processes</p>
<p><b>20. Negative Impacts and Mitigating actions for Disability</b></p>
<p><b>a. Are there negative impacts for Disability? Answer: Yes/No</b> <i>(If yes, please also complete sections b, c, and d).</i></p>
<p>Yes</p>
<p><b>b. Details of Negative Impacts for Disability</b></p>
<p>In the first instance this may feel like a negative impact for children and young people with SEND and their parents/carers. However, over time by increasing inclusivity across mainstream settings (Communities of Schools) and providing earlier intervention and support (Early Years Model), it will mean that, even without an EHCP and/or placements in special schools, children and young people with SEND will be able to thrive and be well supported in the most appropriate setting whilst ensuring those with complex and severe, profound needs are able to access a placement in the most appropriate special school placement.</p>
<p><b>c. Mitigating Actions for Disability</b></p>
<ol style="list-style-type: none"> <li>1. Every child will be placed in accordance with the Children and Families Act 2014. All parents and/or young people will be able to request a particular school, and KCC will remain under a duty to give effect to that requested school unless the exceptions in section 39(4) are met. If a parent requests a special school, a child could only be placed in mainstream / SRP if the mainstream/SRP placement is able to meet their special educational needs, and a special school place would be incompatible with efficient education of others, and/or efficient use of resources.</li> <li>2. A child or young person would only be placed/remain in a mainstream school if KCC is satisfied that adequate and suitable provision can be provided to meet the child/young person's special educational needs. KCC will follow statutory framework and Code of Practice, and every child will continue to have their special educational needs met.</li> <li>3. There is a right of appeal to the First-tier Tribunal if parents/young person disagrees with the school named in Section I of the EHCP.</li> <li>4. Ensure timely planning for children with an EHC Plan, so that there is better communication with parents, and decisions are made that support children accessing suitable education between type of education provision, including from mainstream to mainstream or special to mainstream and/or special to special schools</li> <li>5. If the proposed changes proceed there will be a carefully planned transition period that KCC will develop in collaboration special and mainstream school Headteachers, health partners, parents, carers and children and young people with SEND.</li> </ol>

6. If implemented, KCC will keep the impact of the changes under review, and will continue to monitor and analyse data regarding the impact of the proposed changes on all protected groups
<b>d. Responsible Officer for Mitigating Actions - Disability</b>
Assistant Director Fair Access and (Interim) SEN Processes
<b>21. Negative Impacts and Mitigating actions for Sex</b>
<b>a. Are there negative impacts for Sex? Answer: Yes/No</b> <i>(If yes, please also complete sections b, c, and d).</i>
No. Data shows there are more male children and young people (72.7%) than females (27.3%) in state funded special schools in Kent. As the changes planned are for new children entering special schools from September 2026 and there will be appropriate provision for all children and young people with SEND to attend an education setting that is suitable for their needs, KCC does not believe the change will be detrimental. The EqIA will be reviewed and updated in order to consider the point further before a final decision is made.
<b>b. Details of Negative Impacts for Sex</b>
N/A
<b>c. Mitigating Actions for Sex</b>
<ol style="list-style-type: none"> <li>1. Every child will be placed in accordance with the Children and Families Act 2014. All parents and/or young people will be able to request a particular school, and KCC will remain under a duty to give effect to that requested school unless the exceptions in section 39(4) are met. If a parent requests a special school, a child could only be placed in mainstream / SRP if the mainstream/SRP placement is able to meet their special educational needs, and a special school place would be incompatible with efficient education of others, and/or efficient use of resources.</li> <li>2. A child or young person would only be placed/remain in a mainstream school if KCC is satisfied that adequate and suitable provision can be provided to meet the child/young person's special educational needs. KCC will follow statutory framework and Code of Practice, and every child will continue to have their special educational needs met.</li> <li>3. There is a right of appeal to the First-tier Tribunal if parents/young person disagrees with the school named in Section I of the EHCP</li> <li>4. Ensure timely planning for children with an EHC Plan, so that there is better communication with parents, and decisions are made that support children accessing suitable education between type of education provision, including from mainstream to mainstream or special to mainstream and/or special to special schools.</li> <li>5. If the proposed changes proceed there will be a carefully planned transition period that KCC will develop in collaboration special and mainstream school Headteachers, health partners, parents, carers and children and young people with SEND.</li> <li>6. If implemented, KCC will keep the impact of the changes under review, and will continue to monitor and analyse data regarding the impact of the proposed changes on all protected groups</li> </ol>
<b>d. Responsible Officer for Mitigating Actions - Sex</b>
Assistant Director Fair Access and (Interim) SEN Processes
<b>22. Negative Impacts and Mitigating actions for Gender identity/transgender</b>

<p><b>a. Are there negative impacts for Gender identity/transgender? Answer: Yes/No</b>  <i>(If yes, please also complete sections b, c, and d).</i></p>
No
<p><b>b. Details of Negative Impacts for Gender identity/transgender</b></p>
N/A
<p><b>c. Mitigating actions for Gender identity/transgender</b></p>
N/A
<p><b>d. Responsible Officer for Mitigating Actions - Gender identity/transgender</b></p>
N/A
<p><b>23. Negative Impacts and Mitigating actions for Race</b></p>
<p><b>a. Are there negative impacts for Race? Answer: Yes/No</b>  <i>(If yes, please also complete sections b, c, and d).</i></p>
<p>No. Pupils in Kent with an EHCP are predominantly White British and so we would expect this to be the ethnic group most impacted. Of the total 2024 EHCP cohort, 8.5% were recorded as other than white and 71.5% were recorded as white. 20% did not record an ethnicity category. As the changes planned are for new children entering special schools from September 2026 and there will be appropriate provision for all children and young people with SEND to attend an education setting that is suitable for their needs, KCC does not believe the change will be detrimental to White British pupils, or particularly disadvantage pupils from any other group. The EqIA will be reviewed and updated in order to consider the point further before a final decision is made.</p>
<p><b>b. Details of Negative Impacts for Race</b></p>
N/A
<p><b>c. Mitigating Actions for Race</b></p>
<p>1. Every child will be placed in accordance with the Children and Families Act 2014. All parents and/or young people will be able to request a particular school, and KCC will remain under a duty to give effect to that requested school unless the exceptions in section 39(4) are met. If a parent requests a special school, a child could only be placed in mainstream / SRP if the mainstream/SRP placement is able to meet their special educational needs, and a special school place would be incompatible with efficient education of others, and/or efficient use of resources.</p> <p>2. A child or young person would only be placed/remain in a mainstream school if KCC is satisfied that adequate and suitable provision can be provided to meet the child/young person's special educational needs. KCC will follow statutory framework and Code of Practice, and every child will continue to have their special educational needs met.</p> <p>3. There is a right of appeal to the First-tier Tribunal if parents/young person disagrees with the school named in Section I of the EHCP</p> <p>4. Ensure timely planning for children with an EHC Plan, so that there is better communication with parents, and decisions are made that support children accessing suitable education between type of education provision, including from mainstream to mainstream or special to mainstream and/or special to special schools.</p> <p>5. If the proposed changes proceed there will be a carefully planned transition period that KCC will develop in collaboration special and mainstream school</p>



Headteachers, health partners, parents, carers and children and young people with SEND.
6. If implemented, KCC will keep the impact of the changes under review, and will continue to monitor and analyse data regarding the impact of the proposed changes on all protected groups
<b>d. Responsible Officer for Mitigating Actions – Race</b>
Assistant Director Fair Access and (Interim) SEN Processes
<b>24. Negative Impacts and Mitigating actions for Religion and belief</b>
<b>a. Are there negative impacts for Religion and Belief? Answer: Yes/No</b> <i>(If yes, please also complete sections b, c, and d).</i>
No. This data is not currently recorded or available, KCC will further explore the collection of this data and the EqIA will be reviewed and updated in order to consider the point further before a final decision is made.
<b>b. Details of Negative Impacts for Religion and belief</b>
N/A
<b>c. Mitigating Actions for Religion and belief</b>
1. Every child will be placed in accordance with the Children and Families Act 2014. All parents and/or young people will be able to request a particular school, and KCC will remain under a duty to give effect to that requested school unless the exceptions in section 39(4) are met. If a parent requests a special school, a child could only be placed in mainstream / SRP if the mainstream/SRP placement is able to meet their special educational needs, and a special school place would be incompatible with efficient education of others, and/or efficient use of resources.
2. A child or young person would only be placed/remain in a mainstream school if KCC is satisfied that adequate and suitable provision can be provided to meet the child/young person's special educational needs. KCC will follow statutory framework and Code of Practice, and every child will continue to have their special educational needs met.
3. There is a right of appeal to the First-tier Tribunal if parents/young person disagrees with the school named in Section I of the EHCP
4. Ensure timely planning for children with an EHC Plan, so that there is better communication with parents, and decisions are made that support children accessing suitable education between type of education provision, including from mainstream to mainstream or special to mainstream and/or special to special schools.
5. If the proposed changes proceed there will be a carefully planned transition period that KCC will develop in collaboration special and mainstream school Headteachers, health partners, parents, carers and children and young people with SEND.
6. If implemented, KCC will keep the impact of the changes under review, and will continue to monitor and analyse data regarding the impact of the proposed changes on all protected groups
<b>d. Responsible Officer for Mitigating Actions - Religion and belief</b>
Assistant Director Fair Access and (Interim) SEN Processes
<b>25. Negative Impacts and Mitigating actions for Sexual Orientation</b>
<b>a. Are there negative impacts for sexual orientation. Answer: Yes/No</b> <i>(If yes, please also complete sections b, c, and d).</i>

No
<b>b. Details of Negative Impacts for Sexual Orientation</b>
N/A
<b>c. Mitigating Actions for Sexual Orientation</b>
N/A
<b>d. Responsible Officer for Mitigating Actions - Sexual Orientation</b>
N/A
<b>26. Negative Impacts and Mitigating actions for Pregnancy and Maternity</b>
<b>a. Are there negative impacts for Pregnancy and Maternity? Answer: Yes/No</b> <i>(If yes, please also complete sections b, c, and d).</i>
No
<b>b. Details of Negative Impacts for Pregnancy and Maternity</b>
N/A
<b>c. Mitigating Actions for Pregnancy and Maternity</b>
N/A
<b>d. Responsible Officer for Mitigating Actions - Pregnancy and Maternity</b>
N/A
<b>27. Negative Impacts and Mitigating actions for marriage and civil partnerships</b>
<b>a. Are there negative impacts for Marriage and Civil Partnerships? Answer: Yes/No</b> <i>(If yes, please also complete sections b, c, and d).</i>
No
<b>b. Details of Negative Impacts for Marriage and Civil Partnerships</b>
N/A
<b>c. Mitigating Actions for Marriage and Civil Partnerships</b>
N/A
<b>d. Responsible Officer for Mitigating Actions - Marriage and Civil Partnerships</b>
N/A
<b>28. Negative Impacts and Mitigating actions for Carer's responsibilities</b>
<b>a. Are there negative impacts for Carer's responsibilities? Answer: Yes/No</b> <i>(If yes, please also complete sections b, c, and d).</i>
Yes
<b>b. Details of Negative Impacts for Carer's Responsibilities</b>
<ol style="list-style-type: none"> <li>1. The public consultation indicated that Parent/Carers have experienced heightened anxiety due to the proposed changes in the student population at schools, leading to concerns that their children's needs may no longer be adequately addressed.</li> <li>2. Parents and Carers may face challenges if one child is already enrolled in a special school while another sibling applying for a special school placement after the proposed implementation date of September 2026 may be impacted by the proposed changes in designation and admission</li> </ol>

guidance. This may result in the sibling being placed in a mainstream school or specialist resource provision. This situation may create disparities in educational experiences and support between siblings, leading to concerns about equity and consistency in meeting their children's individual needs.

**3.** The special school review is anticipated to result in changes to the special school system. Consequently, parents and carers who engage with the process may initially have a negative experience in the short term as the transition takes effect and requires time to become fully established.

**4.** Parents/carers may express disagreement with decisions made by the local authority regarding placement of their child in certain educational settings. This disagreement could lead to a rise in challenges and appeals from parents and carers, potentially escalating to tribunals. Such processes can have a negative impact on parents and carers, as they consume time that could be spent with their families and contribute to increased stress levels.

#### **c. Mitigating Actions for Carer's responsibilities**

1. Every child will be placed in accordance with the Children and Families Act 2014. All parents and/or young people will be able to request a particular school, and KCC will remain under a duty to give effect to that requested school unless the exceptions in section 39(4) are met. If a parent requests a special school, a child could only be placed in mainstream / SRP if the mainstream/SRP placement is able to meet their special educational needs, and a special school place would be incompatible with efficient education of others, and/or efficient use of resources.
2. A child or young person would only be placed/remain in a mainstream school if KCC is satisfied that adequate and suitable provision can be provided to meet the child/young person's special educational needs. KCC will follow statutory framework and Code of Practice, and every child will continue to have their special educational needs met.
3. There is a right of appeal to the First-tier Tribunal if parents/young person disagrees with the school named in Section I of the EHCP
4. Ensure timely planning for children with an EHC Plan, so that there is better communication with parents, and decisions are made that support children accessing suitable education between type of education provision, including from mainstream to mainstream or special to mainstream and/or special to special schools
5. If the proposed changes proceed there will be a carefully planned transition period that KCC will develop in collaboration special and mainstream school Headteachers, health partners, parents, carers and children and young people with SEND.
6. If implemented, KCC will keep the impact of the changes under review, and will continue to monitor and analyse data regarding the impact of the proposed changes on all protected groups



## KENT COUNTY COUNCIL – PROPOSED RECORD OF DECISION

### DECISION TO BE TAKEN BY:

Rory Love

Cabinet Member for Education and Skills

### DECISION NUMBER:

24/00097

**For publication** *[Do not include information which is exempt from publication under schedule 12a of the Local Government Act 1972]*

### Key decision: YES

*Key decision criteria. The decision will:*

- a) *result in savings or expenditure which is significant having regard to the budget for the service or function (currently defined by the Council as in excess of £1,000,000); or*
- b) *be significant in terms of its effects on a significant proportion of the community living or working within two or more electoral divisions – which will include those decisions that involve:*
  - *the adoption or significant amendment of major strategies or frameworks;*
  - *significant service developments, significant service reductions, or significant changes in the way that services are delivered, whether County-wide or in a particular locality.*

### Subject Matter / Title of Decision

Special School Review

### Decision:

As Cabinet Member for Education and Skills, I agree to:

- a. Commence the statutory prescribed alterations process by publishing a notice of proposed changes to the designation of specific special schools maintained by Kent Council, which are affected by the Special School Review;
- b. Delegate authority to the Director of SEND to issue the Public Notice;
- c. Request that specific Academy Trusts affected by the Special School Review apply to the Secretary of State under the 'making significant changes to an academy' process to change the type of SEN provision made in the special Academies affected by the Special School Review, and to confirm that KCC will support that application;
- d. Introduce a school-to-school support model for mainstream and special schools in Kent to collaborate through outreach and/or in-reach arrangements; and
- e. Delegate authority for the Director of SEND, 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.

### Reason(s) for decision:

Kent County Council (“**KCC**”) has a duty to plan sufficiency of school places for all children and young people, including those with SEND. As part of its programme to transform SEND provision across the county, KCC is planning special education needs (“**SEN**”) provision for children across mainstream schools, specialist resource provision in mainstream schools (“**SRP**”), and special schools. Through its planning, KCC is seeking to ensure that children in Kent have access to suitable education within or near their local community.

In mainstream schools, KCC has defined, clear expectations for supporting children with SEN through its mainstream core standards. In SRPs, places have been planned for children with special

educational needs who have an Education, Health and Care Plan (“EHCP”) and can follow a mainstream curriculum with reasonable adjustments, specialist input and/or adaptations. KCC is also planning sufficiency of placements in special schools for children with an EHCP who have severe and complex special educational needs and require an adapted curriculum.

A comprehensive review of special school provision in Kent has not taken place since 2001, and the last review of special school funding occurred in 2010. The current system in Kent is insufficient to achieve KCC’s objective of ensuring that children in Kent have access to suitable education within or near their local community. KCC’s educational planning for children in Kent with SEN is firmly anchored in a values-based approach, that prioritises the needs and well-being of all children and young people with SEN across Kent’s state-funded education settings.

The proposals are based in values of equity, local responsibility for children and young people and their preparation for adulthood. These values have informed proposals to meet children and young people’s needs locally with suitable education provided as close as possible to a child’s home; provide equity of access to special education provision with a commitment to ensuring a child’s access to special educational needs provision is not determined by where they live; provide appropriate and equitable levels of funding so that special schools are able to meet the needs of the children they are expected to provide for; and a commitment to focus on pupil outcomes with an emphasis on progression to independence in adulthood.

The current system is also financially unsustainable, with KCC excessively relying on high-cost places in the private sector, which is insufficient to meet challenges the special school sector in Kent faces today. One of the key intended outcomes of the special school review is to enable the LA to meet its medium to long-term planning for a financially sustainable special school model.

Currently KCC is facing an unsustainable financial position and is one of the Local Authorities participating in the DfE’s Safety Valve Programme. The DfE Safety Valve Programme is designed to eliminate KCC’s deficit in its Dedicated Schools Grant by the end of 2027-2028. By this agreement with the DfE, KCC has agreed to implement a DSG management plan. The plan includes action to implement the Countywide Approach to Inclusive Education (CATIE), by improving the SEN offer in mainstream provision (which is also the subject of a separate consultation) as well as ensuring there is sufficient and consistent capacity across the county to support children with the most severe and complex needs in a special school their local area where possible. The Special School Review undertaken by KCC is a critical part of the wider reforms needed to ensure the Council can provide suitable education for all children with SEN, within the resources available.

By making changes in mainstream schools and SRPs in Kent, and medium-long term planning for children with severe and complex SEN being educated at special schools, KCC aims to reduce its reliance on the private special school sector. Currently, the annual cost of a place at a private special school is nearly double that of a state-funded special school place, making it crucial for KCC to transition towards more strategically planned and cost-effective solutions that meet the needs of all children with SEN.

On 16 May 2024, the outcome of the Special School Review was presented to the Children, Young People and Education Cabinet Committee as part of KCC’s system wide transformation projects alongside the Locality Model for Special Educational Needs Inclusion (now known as Communities of School) and the SRP Review. The Cabinet Committee agreed to proceed with a public consultation on proposed changes to the designation of publicly funded special schools in Kent, and proposed changes to admissions guidance for certain special schools.

The public consultation ran from 19 June 2024 to 14 August 2024, and has now closed. The consultation focussed on proposed changes to the designations and admissions guidance for certain special schools in Kent, and a new proposed school-to-school support model in Kent. Consultees

were also asked to provide feedback on KCC’s expectations statement for how special school places should be planned (which is consistent with the requirements of the Children and Families Act 2014 (“**CFA 2014**”)).

The consultation made clear that if KCC decided to move forward with the proposals, following consideration of the consultation feedback received, the next step would be to commence the statutory prescribed alteration procedure in relation to changes to SEN designation of KCC maintained schools. In relation to special Academies, KCC does not have any power to make changes to the type of SEN provision provided. The consultation therefore made clear that, if KCC decided to move forward with the proposals, the next step in relation to special Academies would be for KCC to the relevant Academy Trust(s) apply to the Secretary of State to approve the proposed changes under the ‘significant change’ mechanism which applies to academies.

The responses to the public consultation have been analysed, a report has been prepared for the Cabinet member which summarises those consultation responses. The Cabinet member will carefully consider that report before taking any decision.

The recommendations are that the Cabinet member agrees as follows:

1. Prescribed alterations (maintained schools)

KCC will proceed to publish a statutory notice of proposed changes to the type of special educational needs for which the school is organised to make provision, for the following special schools:

School Name	Current Designation	Proposed Designation
Broomhill Bank School	Communication and Interaction	Neurodivergent and Learning Difficulties
Grange Park School	Communication and Interaction	Neurodivergent and Learning Difficulties
Laleham Gap School	Communication and Interaction	Neurodivergent and Learning Difficulties
Stone Bay School	Communication and Interaction with Severe Learning Difficulties	Profound, Severe and Complex Needs
Valence School	Physical Disabilities and Complex Medical Needs	Profound, Severe and Complex Needs

A formal consultation and representation period will run for 4 weeks following publication of the statutory notice. Any representations and/or objections received in relation to the changes proposed will be considered by KCC before a final decision is taken on whether to proceed with the change in the type of special educational needs for which the school is organised to make provision. If the changes are adopted, then admissions guidance for the schools will also be amended to reflect the change.

2. Academy Trusts

KCC will proceed to request that the Bourne Alliance Multi Academy Trust and the Leigh Academies Trust respectively apply to Secretary of State to make changes to the type of SEN provision in the following special Academies:

School Name	Current Designation	Proposed Designation
Aspire	Communication and Interaction	Neurodivergent and Learning Difficulties

KCC will support any such application. If the Academy Trusts agree, the steps in the applicable significant change process for academies will be followed, and a decision will be taken by the Secretary of State for Education. If the change is approved, KCC will also request that the Academy Trusts amend their admission guidance for these Academies to reflect the change in type of SEN.

### 3. School-to-school support model

KCC will introduce a school-to-school support model for mainstream and special schools in Kent to collaborate through outreach and/or in-reach arrangements.

#### **Background:**

The review of Kent's 24 state-funded special schools has been focused on the areas of accountability that relate to the Local Authority's statutory responsibilities to secure efficient primary and secondary education to meet the needs of the population of KCC's area and to ensure that sufficient school places for primary and secondary education are available for their area. KCC must also keep under review the educational provision made in its area for children and young people who have special educational needs or a disability and must consider the extent to which the provision is sufficient to meet the educational needs of the children and young people concerned. KCC must secure suitable education for children and young people for whom an EHCP is maintained, and is under a duty to make placements that are an efficient use of resources.

To fulfil its duty in planning sufficient provision for children and young people with SEN, KCC aims to ensure that all children and young people with SEN are educated in suitable and appropriate settings. KCC's aim is that, as far as possible, local state-funded special school provision is to be available for children and young people with severe and complex special educational needs, that is within or near their local community. This approach seeks to improve outcomes and promote independence in adulthood. The special school review focussed on developing recommendations which aim:

- To propose options for the future that foster collaboration towards building a more equitable, efficient and effective educational landscape for all children in Kent.
- To identify opportunities for strategic system change to improve SEN provision, enhance educational outcomes, and promote inclusivity for children and young people with SEN in their local communities.
- To inform the planning of special school places over the medium to long-term for children with SEN for whom KCC maintains an EHCP in which a special school need is identified and a placement is named.
- To inform the designation and admission guidance for special schools so that there is clarity about the type of SEN of children and young people for whom KCC has planned special school provision as well as equity of access for children and young people with SEND.
- To inform the principles of funding to ensure a financially sustainable approach to funding state-funded special schools, with funding matched to the level of adaptation and resources needed to provide suitable education for the children placed by KCC.

It is intended that SEN system transformation across mainstream schools and SRPs, alongside a revised special schools model will help Kent County Council reduce its dependence on the private sector special schools by approximately 44%. This shift is essential to ensure the most effective and appropriate use of the High Needs Funding Budget. The revised model would ensure equitable access to special school places for children and young people with severe and complex SEND in or near to

their local communities, which helps them to develop the skills and strategies needed for independence in adulthood.

Before a final decision can be made in relation to changes to the SEN designation of affected special schools in line with the revised model proposed (by KCC, or the Secretary of State in relation to academies) the specific processes set out in this document be followed, which it is recommended that KCC proceed with.

## **Financial Implications**

Funding for special schools is provided by the Department of Education through the High Needs Block of Dedicated Schools Grant. The Council is responsible for both the setting and payment of the Special Schools budgets. In 2023- 24, Kent spent approximately £152m on special school places. This is the largest expense in the High Needs block, accounting for just over 40% of total spend. This includes approximately £9m on exceptional pupil need (additional funding requests outside the standard funding rates).

The proposed decisions at this stage relating to changes in the designation of particular special schools do not have a significant revenue impact. If a decision is made to proceed with the changes following the applicable alteration/change process, any additional revenue costs of delivering those changes would be met from within the overall High Needs Budget.

With regard to potential capital costs, the High Needs Capital Programme totals £61m as agreed in the County Council Budget for 2024-25. This is funded from the Department of Education specific grant.

## **Legal Implications**

KCC is subject to statutory sufficiency duties under the Education Act 1996 (the “1996 Act”), including to secure that efficient primary education and secondary education are available to meet the needs of the population in its area. This includes ensuring that sufficient school placements, in number, character and equipment are available in Kent to provide all pupils the opportunity of appropriate education.

KCC is also subject to duties under the Children and Families Act 2014 (the “2014 Act”), to keep under review the educational provision for children and young people with special educational needs or disability, and consider the extent to which its provision is sufficient to meet the educational needs of its population. If an education, health and care needs assessment identifies a need for SEN provision to be made, an EHCP must specify the SEN provision required. A parent or young person has the right to request the authority to secure that a particular school or other institution is named in the EHCP.

If a particular school or institution is requested by a parent then KCC is required, under the 2014 Act, to secure that the school or institution requested is named in the EHCP unless either: (i) the school or institution requested is unsuitable for the age, ability, aptitude or special educational needs of the child or young person concerned; or (ii) the attendance of the child or young person concerned at the requested school or institution would be incompatible with the provision of efficient education for others or the efficient use of resources. A parent of a child with an EHCP may appeal to the First-tier Tribunal against matters including: (i) the school or institution, or type of school or institution, named in an EHCP; and (ii) if no school or institution is named in an EHCP plan, that fact.

Changes to the type of SEN provision made at a local authority maintained school must be made via the statutory ‘Prescribed Alterations process’, set out in sections 18-24 of the Education and Inspections Act 2006 (the “2006 Act”), and the School Organisation (Prescribed Alterations to

Maintained Schools) (England) Regulations 2013 (the “Prescribed Alterations Regulations”). The proposed decision would trigger the first step under the Prescribed Alterations Regulations, to publish a statutory notice setting out the prescribed alteration proposed for each of the affected special schools that are maintained by KCC. KCC does not have the power to change the type of SEN provision made at a special Academy which is part of an Academy Trust. Any change to the designation of a special academy can only be made through a separate Academy Trust process for making significant changes to an academy, by an application to the Secretary of State. The Secretary of State will be the ultimate decision-maker as to whether changes to the designation and type of SEN provision that is made at special Academies should proceed.

The proposed changes to the designation of the special schools above, if approved pursuant to the prescribed alterations procedure (or significant change procedure for special Academies), do not displace KCC’s statutory duties under either the 1996 Act or the 2014 Act. KCC is still required to identify a child/young person’s special educational needs, identify the SEN provision required, and secure that provision. Where a parent requests a particular school, KCC will be under a duty to give effect to that parental preference unless one of the statutory exceptions applies. Every child will continue to have their needs met in accordance with the statutory scheme if the recommendations are adopted. Further, 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 or phase transfer review of their EHCP.

### **Equalities implications**

KCC is under a duty to have due regard to the three equality needs set out in section 149(1) of the Equality Act 2010, being: (a) the need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act; (b) the need to promote equality of opportunity; and (c) the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

An EQIA has been undertaken and was subject to the public consultation with the responses received used to further develop the document. Equalities implications have been identified in the EQIA in relation to age, disability and sex alongside mitigating actions required. The changes proposed should also be considered alongside other systemic changes affecting children with SEN, including the introduction of an accessibility strategy and steps to make mainstream schools more inclusive.

The special school review EQIA will continue to be regularly reviewed throughout further decision-making stages.

### **Cabinet Committee recommendations and other consultation:**

### **Any alternatives considered and rejected:**

The option of retaining the current special school model in Kent in the short, medium, or long term, has been discounted as it would risk perpetuating inequalities in access to state-funded special school placements, continue barriers for some children and young people with SEN in accessing appropriate support, and ongoing financial challenges due to reliance on costly-out of county and private school placements. The status quo would continue to prevent some children with the most severe and complex special educational needs, including those with dysregulated behaviours, in accessing special school places. It would also hinder progress toward Kent’s strategic goals of inclusion and improved outcomes for children and young people.

**Any interest declared when the decision was taken and any dispensation granted by the Proper Officer:**

.....  
signed

.....  
date

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# Commissioning Plan for Education Provision in Kent

2025 -2029





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## 1. Contact Details

The responsibility for the commissioning, planning and delivery of new school places in Kent is vested in the Director of Education, and the team of four Assistant Directors whose contact details are below.

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**Director of Education**  
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**Tel: 03000 418913**

<p><b>EAST KENT</b></p> <p><b>Robert Veale</b> Assistant Director Education</p> <p>Canterbury, Swale and Thanet</p> <p>Brook House, Reeves Way, Whitstable CT5 3SS</p> <p>Tel: 03000 418794</p> <p>Lorraine Medwin Area Schools Organisation Officer Tel: 03000 422660</p>	<p><b>SOUTH KENT</b></p> <p><b>David Adams</b> Assistant Director Education</p> <p>Ashford, Dover and Folkestone and Hythe</p> <p>Kroner House, Eurogate Business Park, Ashford TN24 8XU</p> <p>Tel: 03000 414989</p> <p>Lee Round Area Schools Organisation Officer Tel: 03000 412309</p>
<p><b>NORTH KENT</b></p> <p><b>Ian Watts</b> Assistant Director Education</p> <p>Dartford, Gravesham and Sevenoaks</p> <p>Worrall House, 30 Kings Hill Avenue, Kings Hill ME19 4AE</p> <p>Tel: 03000 414302</p> <p>David Hart Area Schools Organisation Officer Tel: 03000 410195</p>	<p><b>WEST KENT</b></p> <p><b>Nick Abrahams</b> Assistant Director Education</p> <p>Maidstone, Tonbridge and Malling and Tunbridge Wells</p> <p>Sessions House, County Hall, Maidstone ME14 1XQ</p> <p>Tel: 03000 410058</p> <p>Paul Wilson Area Schools Organisation Officer Tel: 03000 415650</p>

## 2. Foreword

Welcome to the County Council's Commissioning Plan for Education Provision in Kent 2025-29 (KCP). This is the latest annual update of our five-year rolling Plan. It sets out our plans as Strategic Commissioner of education provision across all types and phases of education.

This Plan builds on the positive achievements of recent years. We have continued to commission new primary, secondary, and special provision to ensure we fulfil our statutory responsibility of ensuring a school place is available for every child, but also our non-statutory commitment to facilitate parental choice. This is not without its challenges, as I outline below.

For September 2024, I am pleased to report that we delivered the following commissioned provision:

- Primary - 0.5 FE (15 places) permanent and 50 temporary Year R places
- Secondary - 1 FE (30 places) permanent and 100 temporary Year 7 places
- Special - 10 special schools places and 13 specialist resource provision places

We could not have achieved this without the support of Headteachers, Governors, and Academy Trusts who have helped us ensure there are sufficient school places while at the same time supporting over 250,000 children and young people to achieve their full potential.

We forecast that between the 2023-24 and 2028-29 academic years total primary school rolls will reduce by 1,467 pupils and secondary rolls will increase by 5,089 pupils. The profile of change in school rolls will vary across the County, with some local areas requiring additional places to meet demand. To meet need in specific localities, and to reflect housing development, for the academic years 2025-26 to 2028-29, 16.6FE of primary provision and 120 temporary Year R places will be needed along with 27FE of secondary provision and 705 temporary Year 7 places.

As in previous years, the number of pupils identified as requiring a specialist place to meet their educational needs remains a challenge. We will address the need for high quality, sustainable SEN provision within the context of our Safety Valve Agreement with the DfE. Between the academic years 2025-26 and 2028-29, we currently intend to commission 530 additional specialist places.

The sector and the Local Authority continue to face challenges related to costs; for the County Council the imbalance between the cost of providing additional places and the funding that we receive remains. We will continue to ensure a sufficient supply of places however, without additional funding this imbalance may influence the decision-making process around the location and timing of new education provision.

The new Government has not significantly changed the national direction of travel which remains towards high quality inclusive education provided through strong families of schools with capacity to lead rapid and sustainable improvement. We continue to support these principles and encourage those Kent schools not currently benefitting from such collaborative arrangements to explore their options on this journey.

Rory Love OBE, BA (Hons) - Cabinet Member for Education and Skills



## **3. Introduction and Executive Summary**

### **3.1 Purpose**

The County Council is the Strategic Commissioner of Education Provision in Kent. This Commissioning Plan sets out how we will carry out our responsibility for ensuring there are sufficient high quality places, in the right places for all learners, while at the same time fulfilling our other responsibilities to raise education standards and promote parental preference. The Plan details the expected future need for education provision, thereby enabling parents and education providers to put forward proposals as to how these needs might best be met.

This Plan reflects the dynamic and ongoing process of ensuring there are sufficient places for Kent children in schools, and other provisions. It is subject to regular discussion and consultation with schools, district/borough councils, KCC (Kent County Council) Elected Members, the diocesan authorities, and others. The content of this Plan reflects those discussions and consultations.

### **3.2 The Kent Context**

Kent is a diverse County. It is largely rural with a collection of small towns. Economically our communities differ, with economic advantage generally in the West, and disadvantage concentrated in our coastal communities in the South and East. Early Years education and childcare are predominantly provided by the private and voluntary sectors. Our schools are a mix of maintained and academies and include infant, junior, primary, grammar, wide ability comprehensive, all-through, single sex and faith based. Post-16 opportunities are available through schools, colleges and private training organisations.

### **3.3 What We Are Seeking to Achieve**

Our vision is that every child and young person should go to a good or outstanding early years setting and school, have access to the best teaching, and benefit from schools and other providers working in partnership with each other to share the best practice as they continue to improve. Commissioning education provision from good or better providers can assist in securing this vision. To address the commissioning needs outlined in this Plan we welcome proposals from existing schools, trusts, the three dioceses and new providers; those proposals should be aligned to the commissioning requirements set out in the Plan.

### **3.4 Principles and Guidelines**

The role of the Local Authority is set within a legal framework of statutory duties which are outlined in the relevant sections of the Plan. We also have a set of principles and planning guidelines to help us in our role as the Commissioner of Education Provision (Section 5). It is important that the Local Authority is transparent and clear when making commissioning decisions or assessing the relative merits of any proposals it might receive.

### **3.5 Kent's Demographic Trends**

Information from the Office for National Statistics shows that in 2005 there were 15,613 live births in Kent (excluding Medway). The number of births rose each year up to 2012 when there was a peak in births of 18,147 children. Since this time, birth numbers have fallen to 16,364 in 2022. KCC will continue to monitor this data and forecast its impact over time.

The number of children on the rolls of Kent schools is driven by the size of the school-aged population in the county but is also influenced by the number of children resident outside of Kent on the rolls of the county's schools, the take-up of state funded school places and other factors such as the pace and type of new housing. One further factor to monitor during the lifetime of this KCP is the level of displacement of children from independent schools into the maintained sector arising from the Government's decision to impose VAT on independent school fees. Due to these additional factors, a change in the overall school-aged population in the county does not on its own necessarily translate into the same change in the number of children on the rolls of schools in

Kent. Additionally, changes in the overall school age population at County or district level do not necessarily mirror changes in population at smaller geographic levels, such as planning groups.; these are explored in Section 7.

### **Capital Funding**

The pressure on the County's Capital Budget continues, particularly as demand for secondary and specialist places grows. The cost of delivering school places is currently met from Basic Need grant from the Government, prudential borrowing by the County Council, Section 106 property developer contributions and the Community Infrastructure Levy (CIL). Government funding for 'Basic Need' is allocated on a formula based upon information provided by local authorities concerning forecast numbers of pupils and school capacity.

The Department for Education's (DfE) Free Schools Programme is another way to deliver some of the school provision Kent needs. We have encouraged promoters to submit bids to Waves 13 and 14, with some success, but this programme is not a significant contributor to places overall and does have financial risks.

KCC also secures developer contributions to the capital programme. The budget gap between what is needed for KCC to meet its statutory duties as school place commissioner and what is available is significant. All avenues are being explored to reduce the risks, but inevitably difficult decisions will have to be made to prioritise KCC's investment of the capital budget. The cost of construction has risen considerably since 2020 and is likely to continue during the Plan period. We will continue to manage and mitigate this as far as we are able to, however, pressure from inflation may become a constraint to our commissioning strategy.

### **Kent's Forward Plan – Commissioning Summary**

Detailed analysis, at district level, of the future need for primary and secondary school places is contained in Section 7 of this Plan. Figures 3a,3b and 3c provide a summary of the need for additional places, both permanent and temporary, identified within the Commissioning Plan:

**Figure 3a: Summary of the commissioning proposals for primary schools by district/borough**

District	By 2025-26	By 2026-27	By 2027-28	By 2028-29	Between 2029-32	Post 2032
Ashford		1FE		0.3FE	4.5FE	2FE
Canterbury			1FE		3FE	1FE
Dartford and Swanley	Up to 30 Year 7 temp places	2FE	2FE	1FE	2FE	
Dover					1.8FE	3FE
Folkestone and Hythe						2FE
Gravesham	0.3FE			1FE		
Maidstone	Up to 45 Year R temp place	1FE	1FE Up to 15 Year R temp place	2FE		
Sevenoaks						
Swale		1FE		1FE	2FE	
Thanet						6FE
Tunbridge and Malling					1FE	
Tunbridge Wells	Up to 10 Year R temp place	Up to 10 Year R temp place	1FE Up to 10 Year R temp place	1FE		
<b>Totals</b>	<b>0.3FE 85 Year R temp places</b>	<b>5FE 10 Year R temp places</b>	<b>5FE 25 Year R temp places</b>	<b>6.3FE</b>	<b>14.3FE</b>	<b>14FE</b>

**Total of 44.9FE of additional provision across the forecast period and up to 120 temporary Year R places**



**Figure 3b: Summary of the commissioning proposals for secondary schools by planning group**

<b>Non-Selective Planning Group</b>	<b>By 2025-26</b>	<b>By 2026-27</b>	<b>By 2027-28</b>	<b>By 2028-29</b>	<b>Between 2029-32</b>	<b>Post 2032</b>
Ashford North	2FE					2FE
Canterbury City			Up to 30 Year 7 temp places	Up to 30 Year 7 temp places	Up to 45 Year 7 temp places	
Dartford and Swanley			2FE	2FE		
Dover						2FE
Faversham			1FE		1FE	
Gravesham and Longfield			3FE			
Maidstone District	Up to 90 Year 7 temp places	Up to 90 Year 7 temp places	3FE	6FE		
Sevenoaks and Borough Green						
Sittingbourne	Up to 30 Year 7 temp places	Up to 30 Year 7 temp places	Up to 120 Year 7 temp places	Up to 90 Year 7 temp places	6FE	
<b>Selective Planning Group</b>	<b>By 2025-26</b>	<b>By 2026-27</b>	<b>By 2027-28</b>	<b>By 2028-29</b>	<b>Between 2029-32</b>	<b>Post 2032</b>
Canterbury and Faversham			1FE			
Maidstone and Malling				1FE		
North West Kent				6FE		
Thanet	Up to 30 Year 7 temp places	Up to 30 Year 7 temp places	Up to 30 Year 7 temp places	Up to 15 Year 7 temp places	Up to 60 Year 7 temp places	
West Kent		Up to 60 Year 7 temp places	Up to 30 Year 7 temp places	Up to 30 Year 7 temp places		
<b>Total secondary commissioning</b>	<b>2FE 150 Year 7 temp places</b>	<b>0FE 180 Year 7 temp places</b>	<b>10FE 210 Year 7 temp places</b>	<b>15FE 165 Year 7 temp places</b>	<b>7FE 105 Year 7 temp places</b>	<b>4FE</b>

**Total of 38FE across the forecast period and 810 temporary Year 7 places**

**Figure 3c: Summary of commissioning intentions for specialist provision**

<b>District</b>	<b>By 2025-26</b>	<b>By 2026-27</b>	<b>By 2027-28</b>	<b>By 2028-29</b>
Ashford				
Canterbury		120 places		
Dartford		40 places		
Dover				
Folkestone and Hythe				
Gravesham				
Maidstone				
Sevenoaks		250 places		
Swale			40 places	
Thanet		30 Places		
Tonbridge and Malling			50 places	
Tunbridge Wells				
<b>Totals</b>	<b>0 places</b>	<b>440 places</b>	<b>90 places</b>	<b>0 places</b>

**A total of 530 permanent places across the planned period**

### **3.6 Special Educational Needs**

The Local Authority is responsible for issuing and maintaining EHCPs for children and young people between the ages of 0-25 years. As of January 2024, this totalled 19,407 children and young people with an EHCP in Kent. This is an increase of 477 (2.5%) since January 2023. In England, the number of children and young people with EHCPs increased to 575,963 in January 2024, up by 11% from 2023. The number of EHCPs have increased each year since 2010.

In Kent 34.8% of children and young people with an EHCP are educated in mainstream schools (including SRPs), whilst the national figure is 43.1%. Whereas 40.4% of Kent children and young people with EHCPs are educated in a special school (including independent schools) compared to 32.1% nationally.

To ensure the LA is able to provide sustainable high quality provision, the system needs to be realigned and the proportion of children and young people catered for within each provision type brought in line with national figures, so that specialist places are only for those children and young people with the most complex needs. A significant change programme is ongoing to improve mainstream school SEND inclusion capacity so staff are skilled, confident and able to educate and support more children with EHCPs. This realignment will be supported by the inclusive practices within Kent's Countywide Approach to Inclusive Education (CATIE) and will ensure a greater proportion of Kent's children and young people will be supported and achieve their full potential in mainstream schools closer to their homes.

To meet the need for specialist places across Kent, including meeting the needs in areas of population growth, a mixture of new special schools, expansions of existing schools and the establishment of satellites and SRPs will be commissioned across Kent. This plan will only reflect a proportion of our commissioning intentions at this stage as the full plan will need to be informed by the review of our continuum of SEND provision, reporting in the first half of 2025.

KCC produces an annual SEND Sufficiency Plan for children and young people. In addition, the reviews of Special Schools, Specialist Resource Provisions and Early Years Provision will contribute to a revised SEND Strategy, setting out the direction for the next five years. The outcomes from these reviews and further work to inform KCC's approach to supporting children and young people with Social, Emotional and Mental Health (SEMH) needs, aligned with the approach to Alternative Provision across all twelve of Kent's districts, will inform the revision of the new SEND Sufficiency Plan.

The SEND Sufficiency Plan sits under the Commissioning Plan for Education Provision in Kent to inform strategic educational place planning. The purpose of the SEND Sufficiency Plan is to inform and support the Local Authority in its development of strategic place planning for SEND educational provision in the medium to long term.

### **3.7 Early Education and Childcare**

Early Education and Childcare in Kent is available through a large, diverse and constantly shifting market of maintained, private, voluntary, independent and school-run providers, childminders and academies, all of which operate as individual businesses and are therefore subject to market forces.

The annual Childcare Sufficiency Assessment (CSA) shows the supply of, and demand for, early years and childcare provision across the County, including where there might be over supply and particularly a deficit in provision. The CSA for the 2024-2025 academic year is based on the DfE analysis for childcare places needed for 9 month to 36 month-olds combined with the supply and demand for childcare for 3 and 4 year olds in the Summer Term 2024 when demand for the take up and supply of childcare is greatest.

Across the county as a whole, there are forecast to be sufficient childcare places for 0-4 year olds. However, the CSA indicates that there are deficits of places in specific planning groups. The Education People's Early Years and Childcare Service will work with providers and potential providers to encourage the establishment of additional provision where it is required.

The supply of Free Entitlement places for 9 months to four year olds will be kept under review as planned new housing developments are built and potentially increase the demand for places. Where housing developments are proposed in school planning areas where there is an indicative deficit of places or where the size of a development means that it will require new provision; KCC will engage in discussions with developers to either seek funding to provide nursery provision which may include securing community rental or leasehold accommodation availability for private, voluntary or independent sector providers of 0-4 year old childcare.

When a new school is delivered according to the ESFA Baseline Design, a nursery space is now included in the design. As new schools are planned, KCC will work with the sponsor to identify early years provision and the most appropriate way to deliver this.

### **3.8 Post-16 Education and Training in Kent**

The work of Pathways for All, the county's 16-19 review, is moving on rapidly. The strategic board is well established and the recommendation implementation groups have been working for over two years. A new chair has been appointed from within the county and is working with the Strategic Board to develop an updated strategy. The priorities from this strategy are:

- To secure a mechanism that creates joint ownership of knowledge and skills between providers and employers in Kent and Medway
- To create relevant and viable Level 3 provision across Kent and Medway that reflects regional skill needs, whilst providing meaningful choice, an outstanding learning experience and strong progression.
- To ensure there is an offer that enable learners who have SEMH needs to reengage with mainstream provision and perform as well as those cohorts that do not.
- To ensure there is an appropriate and local offer to enable learners who have SEND requirement to increase their life choices and meet their full potential.
- To increase the number of learners, including those with SEND, studying at Level 2 from a GCSE base of less than 2 (Level 1 entry criteria).

Another development is the establishment of Local Collaborative Partnership Areas (LCPAs), bringing together senior leaders in travel to learn areas across the county to plan a coherent offer at a local level. All areas have appointed a lead to drive the work in the area and have begun setting priorities.

## 4. Principles and Planning Guidelines

### 4.1 What We Are Seeking to Achieve

Our Principles and Planning Guidelines underpin our commissioning decisions. This is further supported by a suite of key strategies including, but not limited to:

- Kent's Strategy for Children and Young People with Special Educational Needs and Disabilities 2021-2024
- Countywide Approach to Inclusive Education (CATIE) 2023 – 2028
- Kent 16 to 19 Review - Pathways For All

In the national policy context, the Local Authority is the Commissioner of Education Provision and providers come from the private, voluntary, charitable and maintained sectors. The role of the Local Authority is set within a legal framework of statutory duties; the duties for each phase or type of education in Kent are shown under the relevant section in this Plan. Within this framework, the Local Authority continues to be the major provider of education by maintaining most Kent schools and it also fulfils the function of “provider of last resort” to ensure new provision is made if no other acceptable new provider comes forward.

Education in Kent is divided into three phases, although there is some overlap between these. These three phases are:

- Early Years: primarily delivered by private, voluntary and independent pre-school providers, accredited child-minders, and schools with maintained nursery classes.
- 4-16 years: “compulsory school age” during which schools are the main providers.
- Post-16: colleges and schools both offer substantial provision, with colleges as the sole provider for young people aged 19-25 years.

The Local Authority also has specific duties in relation to provision for pupils with Special Educational Needs, pupils excluded from school or pupils unable to attend school due to ill health.

### 4.2 Principles and Guidelines

It is important that the Local Authority is open and transparent in its role as the Strategic Commissioner of Education. To help guide us in this role we abide by clear principles and consider school organisation proposals against our planning guidelines. We stress that planning guidelines are not absolutes, but a starting point for the consideration of proposals.

### 4.3 Over-Arching Principles

- Every child should have access to a local, good or outstanding school, which is appropriate to their needs.
- All education provision in Kent should be financially efficient and viable.
- We will consider the needs and aspirations of the local community.
- We will recognise parental preference.
- We recognise perceptions may differ as to benefits and detrimental impacts of future proposals. We will ensure our consultation processes capture the voice of all communities, but to be supported proposals must demonstrate overall benefit to the whole community.
- The needs of Children in Care and those with SEN and disabilities will be given enhanced consideration in any commissioning decision.
- We will also give priority to organisational changes that create environments better able to meet the needs of other vulnerable children, including those from minority ethnic communities and/or from low income families.

- Any educational provision facing difficulties will be supported and challenged to recover in an efficient and timely manner. Where sufficient progress is not achieved, we will seek to commission alternative provision or another provider.
- If a provision is considered or found to be inadequate by Ofsted, we will seek to support the DfE with the commissioning of an alternative provider.
- In areas of housing growth, we will require developer contributions to fund or part fund new and additional school provision.
- In areas of high surplus capacity, we will take actions where possible to reduce the surplus and will seek to work with schools and own admission authorities to minimise the impact of surplus.<sup>1</sup>

#### **4.4 Planning Guidelines – Primary**

- The curriculum is generally delivered in Key Stage specific classes. Therefore, for curriculum viability, primary schools should be able to operate at least four classes.
- We will actively promote opportunities for small primary schools to work together.
- Where possible, planned Published Admission Numbers (PANs) will be multiples of 30, but where this is not possible, multiples of 15 are used.
- We believe all-through primary schools deliver better continuity of learning as the model for primary phase education in Kent. When the opportunity arises, we will seek to amalgamate separate infant and junior schools into a single primary school. However, we will have regard to existing local arrangements and seek to avoid leaving existing schools without links on which they have previously depended.
- At present primary school provision is co-educational, and we anticipate that future arrangements will conform to this pattern.
- Over time we have concluded that a minimum of 2FE provision (420 places) is preferred in terms of the efficient deployment of resources.

#### **4.5 Planning Guidelines – Secondary**

- PANs for secondary schools will not normally be less than 120 or greater than 360. PANs for secondary schools will normally be multiples of 30.
- Over time we have concluded that the ideal size for the efficient deployment of resources is between 6FE and 8FE.
- Proposals for additional secondary places need to demonstrate a balance between selective and non-selective school places.
- We will encourage the formation of all-aged schools (primary through to secondary) if this is in the interests of the local community.

#### **4.6 Planning Guidelines - Special Educational Needs**

- We aim to build capacity in mainstream schools by broadening the skills and special arrangements that can be made within this sector to ensure compliance with the relevant duties under SEN and disability legislation.
- For children and young people for whom mainstream provision is assessed not to be appropriate, we seek to make provision through Kent based, state funded special schools. For young people aged 16-19 years, provision may be at school or college. For young people who are aged 19-25 years, provision is likely to be college based.
- We will support children and young people to benefit from living within their local community where possible and we will seek to provide them with day places unless residential provision is specifically needed for social care or health reasons. In such cases, agreement to joint placement and support will be sought from the relevant KCC teams or the Health

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<sup>1</sup> Actions might include re-classifying accommodation, removing temporary or unsuitable accommodation, leasing spaces to other users and promoting closures or amalgamations. We recognise that, increasingly, providers will be responsible for making such decisions about the use of their buildings, but we believe we all recognise the economic imperatives for such actions.

Service. This agreement will be preceded by the relevant health or social care assessments.

- We will aim to reduce the need for children to be transported to schools far away from their local communities by developing local provision to meet need.

#### **4.7 Planning Guidelines - Expansion of Popular Schools and New Provision**

- We support diversity in the range of education provision available to children and young people. We recognise that new providers are entering the market, and that parents and communities are able to make free school applications.
- As the Strategic Commissioner of Education Provision, we welcome proposals from existing schools and new providers that address the needs identified in this Plan, this includes new provision to meet increased demand.
- In order for us to support any such proposal, they must meet an identified need and should adhere to the planning principles and guidelines set out above.

#### **4.8 Small Schools**

KCC defines small schools as 'those schools with fewer than 150 pupils on roll and/or a measured capacity of fewer than 150 places'. We have over 100 primary schools that fit this criterion.

We value the work of our small schools and recognise the challenges faced. We continue to work with partners to maximise the resilience of small schools to deal with the challenges they face in terms of leadership and management, teaching and learning, and governance and finance so that they can enable their pupils to grow up, learn, develop and achieve, and continue to play a valued role in their communities.

KCC and its partners, in particular the dioceses, will ensure that:

- Support is given to small schools seeking to join appropriate multi-academy trusts, or take other steps on such a pathway.
- All such partners will work closely together to support the protection and maintenance of the distinctive character and ethos of small Church of England schools in future collaborative arrangements.

#### **4.9 Families of Schools**

KCC has encouraged schools to work collaboratively together for many years. Such collaborations take many forms in the current education landscape, such as being a church school within Canterbury, Rochester or Southwark's purview, forming a collaboration with neighbouring schools to work jointly on shared school improvement objectives, formally federating or joining a shared schools trust, or academising within a MAT. All these options are important in ensuring no school becomes isolated.

The national direction of travel is towards high quality, inclusive education to be provided through families of schools within strong multi-academy trusts. This is underpinned by the ability of strong trusts to deliver rapid and sustainable school improvement, excellent support for teachers and teaching, strategic leadership and governance, and effective financial management. We support these principles and encourage those Kent schools not currently benefitting from such collaborative arrangements to explore their options to join or form a multi-academy trust.



## **5. Capital Funding**

### **5.1 Introduction**

The Local Authority as Strategic Commissioner of Education Provision has a key role in securing funding to provide sufficient education provision in the County, particularly in schools.

The cost of providing additional school places is met from Government Basic Need Grant, prudential borrowing by KCC and developer contributions. It continues to be clear through the County Council's Medium-Term Financial Plan that KCC is not in a position to undertake prudential borrowing to support new provision. To do so would place undue pressure on the revenue budget in what are already challenging times for the Authority. The prospect of having to meet the growth in demand for places through additional borrowing confronts the County Council with a dilemma between delivering its statutory duty on school places and maintaining its financial soundness. Members and officers continue to lobby Ministers and officials within the DfE over this critical issue. Delivery of the additional school places needed in the County will rely more than ever on an appropriate level of funding from Government and securing the maximum possible contribution from housing developers.

### **5.2 Basic Need**

Basic Need funding is allocated by Government on the basis of a comparison of school capacity (not pupil admission numbers) against forecast mainstream pupil numbers from reception year to year 11 uplifted to provide a 2 per cent operating margin. Where capacity is lower than forecast, the DfE provides funding towards the gap.

The allocations for the 2024-25 financial year are based upon the projected need for new places by September 2025 (the start of academic year 2025/26); Kent has been allocated £5,046,624. The 'lumpy' nature of establishing new school provision means that the County Council incurs the majority of the capital costs at the outset of mitigating a forecast place deficit, e.g. expanding a school by a whole FE; whereas the Basic Need formula does not account for this and provides the Council with funding for places in an incremental way over a longer period of time.

### **5.3 Free Schools Programme**

One funding option which can assist with or overcome the challenges of forward funding new schools is the Free Schools programme. We encouraged promoters to submit bids to Waves 13 and 14, with some success. However, as the free school programme has become more restrictive, being targeted to certain geographical areas of the Country in relation to mainstream schools, and of limited number for special schools and alternative provisions, it will not be the answer to all our needs. Additionally, it is not risk free for the Local Authority. Delays in delivery can require the Authority to put in place temporary provision with the resultant unplanned expense.

### **5.4 Developer Contributions**

Each of the 12 districts in Kent are planning significant housing growth, it is essential that this growth is supported by sufficient education provision that is well integrated within the areas of growth and established at the right time. The cost of providing school places in response to housing growth is significant, the County Council seeks developer contributions towards mitigating this cost. Developer contributions for education are secured either through Section 106 (s106) agreements or through the Community Infrastructure Levy (CIL).

S106 agreements are secured from housing developers at the time that planning permission is granted, they are intended to ensure development proposals are acceptable in planning terms. When securing a s106 agreement KCC will outline the additional impact the development would have on local schools, where we would need to add additional provision in response and the cost



of doing so. Whilst district authorities, as the relevant Local Planning Authority, are the decision maker on whether contributions towards education provision should be made or not, once a s106 agreement is in place the housing developer becomes legally obligated to pay KCC contributions at specified points.

We will continue to seek developer contributions at every opportunity allowed through legislation and apply funding secured to the most appropriate project in order to mitigate development. Where additional secondary school places are required in order to mitigate development we will seek to secure funding towards both selective and non-selective places on the basis of 25% of the additional demand being within the selective sector; this will not preclude future residents of the development being able to apply for and access a school place in the same way as all other residents in Kent and does not impact the commissioning approach in an area which is based on the forecast need.

Five districts in Kent have adopted CIL, which has largely replaced s106 agreements in those areas. The levy is a tariff-based system where developers are charged a set rate per square metre of development. There is no direct link between the development's impact on local infrastructure and the amount it pays. All CIL funding is paid to the relevant district or borough, which then determines how it will be spent once it is received; there is no funding ring-fenced for education provision and KCC will usually be required to 'bid' to the Borough for a share of the funding. This provides KCC with no security that development charged under CIL will contribute to the cost of new school provision at the time planning permission is granted. Under CIL the amounts collected for community infrastructure are typically lower than could be secured through s106 and the spending of CIL is entirely at the discretion of the District Authority and not KCC, which places the County Council at significant risk moving forward.

The County Council is keen to work with the Government to ensure that reforms to developer contributions are effective in securing the necessary infrastructure to support growth. The new Government has confirmed that they do not intend to implement the introduction of the Infrastructure Levy within the Levelling-up and Regeneration Act 2023; whilst this may be positive in some ways, there still remains a significant level of uncertainty.

## **5.5 Value for Money**

In drawing up options for providing additional places, in addition to the Principles and Planning Guidelines set out in Section 5, the Local Authority consider a range of practical issues, such as:

- The condition and suitability of existing premises.
- The ability to expand or alter the premises (including arrangements whilst works progress).
- The works required to expand or alter the premises.
- The estimated capital costs.
- The size and topography of the site.
- Environmental considerations.
- Future proofing.
- Road access to the site, including transport and safety issues.

Kent is committed to securing value for money when providing additional school accommodation, in line with the DfE's baseline designs, and output performance specification. The construction method for new accommodation will be that which is the most appropriate to meet the needs of provision, e.g. temporary or permanent provision and that which represents good value for money.

One of the key benchmarks against which we will be monitoring all Basic Need projects is the 'cost per pupil'. This benchmark divides the construction cost of the project by the number of pupils that the facility will accommodate to provide a project cost per pupil.

This table provides high level findings of a comparison between KCC costs and the National Schools Delivery Cost Benchmark database. KCC's average historic cost of delivering additional places in the primary and secondary phase is higher than the national average. These represent historic average costs (at Q3 2023 prices) and will increase with inflation in line with the cost of construction over time.

A further high level review comparing KCC costs to the National Schools Delivery Cost Benchmark database rebased to Southeast has been carried out. This details that the KCC cost for Primary phase expansion is currently lower than the Southeast average, however New build is slightly higher. The Secondary Phase is showing that both expansion and new build are lower than the Southeast benchmark, sitting between the national and Southeast benchmark.

**Figure 6a: Average costs - National and Kent**

**Primary Education Phase:**

Type	National School Delivery Average Costs	National School Delivery Average Costs (South East)	KCC Average Costs
Expansion	£19,989	£22,587	£21,066
New Build	£23,865	£26,967	£27,559

**Secondary Education Phase:**

Type	National School Delivery Average Costs	National School Delivery Average Costs (South East)	KCC Average Costs
Expansion	£27,492	£31,066	£29,036
New Build	£28,912	£32,670	£30,441

## **6. Commissioning Statutory School Provision**

### **6.1 Duties to Provide for Ages 4-16 Years**

The law requires local authorities to make provision for the education of children from the September following their fourth birthday to the end of the academic year in which their sixteenth birthday falls. Most Kent parents choose to send their children to Kent schools. Some parents choose to educate their children independently, either at independent schools or otherwise than at school (i.e. at home); others will send their children to maintained schools outside Kent (Kent maintained schools also admit some children from other areas). Kent will offer a school place to any resident child aged between 4-16 years.

A minority of young people aged 14-16 years old are offered college placements or alternative curriculum provision, usually through school links. Some children are educated in special schools or non-school forms of special education provision because of their special educational needs.

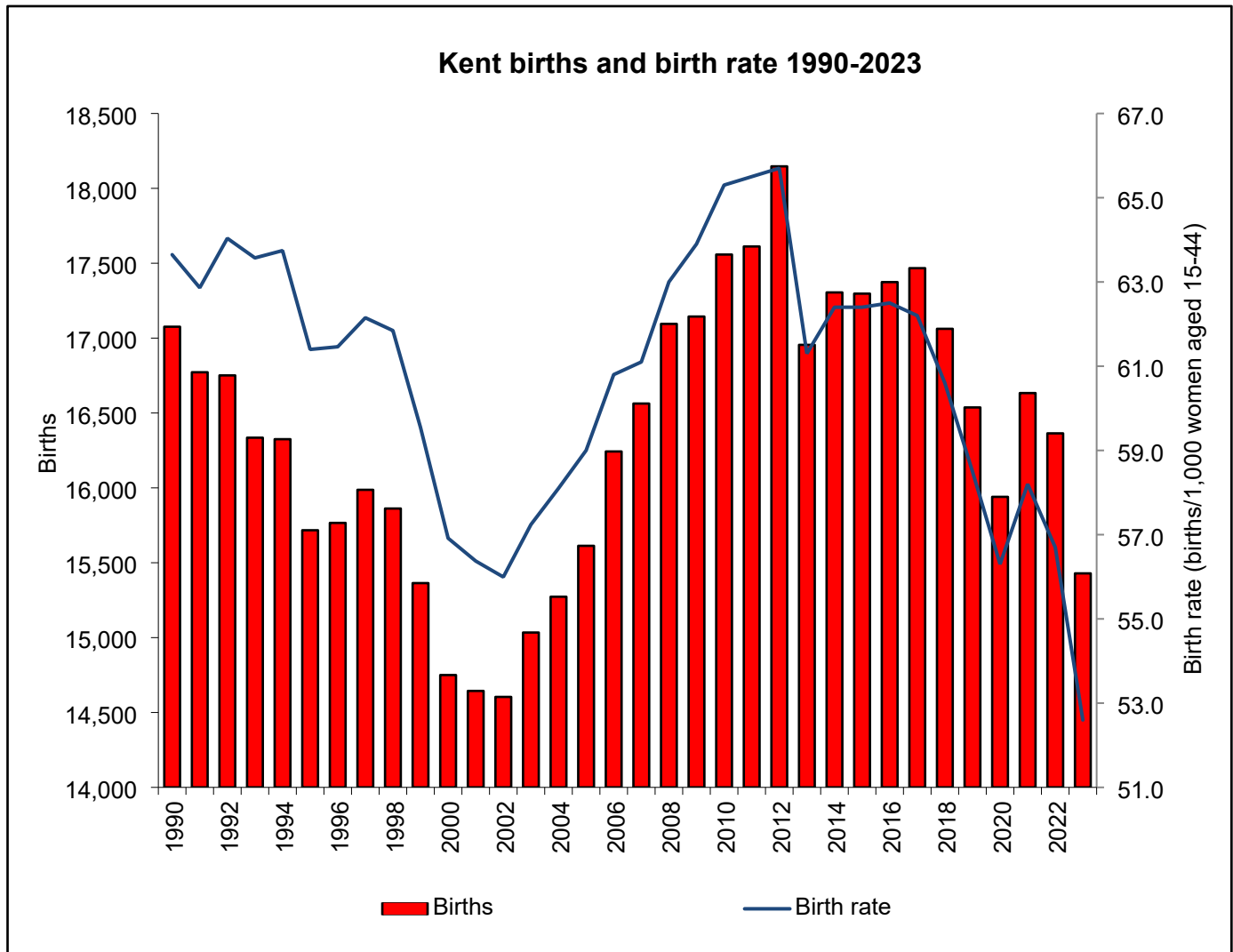
The local authority has a statutory duty to provide full time education for pupils “not in education by reason of illness, exclusion or otherwise” which is appropriate to individual pupil needs. This duty is discharged through pupil referral units, alternative provision commissioned by secondary schools and the Rosewood School.

### **6.2 Kent-Wide Summary**

Detail on the requirement for additional school places is contained in the district/borough commentaries which follow. For 2025-26 and 2026-27 many projects are already in progress. For later years, the need for expansion in planning groups has been noted, but specific schools may not have been identified. For projects beyond 2026 the commissioning proposals may be dependent on the pace of planned housing development being realised. A Countywide summary of the proposals for primary, secondary and SEN school places in each district/borough are set out in Section 3.7.

Figure 7a shows the Kent birth rate and the number of recorded births as published by the Office of National Statistics (ONS). Births recorded by the ONS provide a consistent way of measuring and demonstrating changes in births over the last 30 years; it should be noted that the quantum of school places needed is not solely driven by the number of births and our forecasting takes into account those children resident in the county that were born elsewhere, and the forecast inward migration led by housing growth and other factors. Overall, Kent birth figures indicate a significant fall in the number of births since 2017 but show a slight upturn in 2021 before dropping back in 2022 and 2023.

**Figure 7a: Kent births and birth rates 1990-2023**



\*Source: Office for National Statistics, 2022

**Figure 7b: Housing completions and future housing supply 2001-26**

District	Completions*				Period 2023-28			Grand total 2003-28
	2003-08	2008-13	2013-18	2018-23	Extant	Allocations	Total	
Maidstone	3,796	3,415	4,103	7,455	3,676	2,083	5,759	24,528
Dartford	3,112	1,907	4,367	3,469	1,964	3,202	5,166	18,021
Swale	3,547	2,436	2,911	4,131	4,351	450	4,801	17,826
Ashford	3,564	2,514	2,865	4,480	3,397	857	4,254	17,677
Canterbury	3,667	2,977	2,061	2,980	1,718	4,268	5,986	17,671
Tonbridge & Malling	3,920	2,537	4,098	2,427	3,355	104	3,459	16,441
Thanet	2,846	2,958	1,813	2,579	3,215	1,292	4,507	14,703
Tunbridge Wells	2,204	1,307	2,008	3,081	2,679	164	2,843	11,443
Dover	1,855	1,253	2,227	2,639	1,611	1,605	3,216	11,190
Folkestone & Hythe	2,145	1,368	1,856	2,217	939	2,291	3,230	10,816
Gravesham	1,594	1,637	952	1,540	2,147	150	2,297	8,020
Sevenoaks	1,501	1,297	1,721	1,603	1,866	-	1,866	7,988
<b>Kent</b>	<b>33,751</b>	<b>25,606</b>	<b>30,982</b>	<b>38,601</b>	<b>30,918</b>	<b>16,466</b>	<b>47,384</b>	<b>176,324</b>

Source: Housing Information Audit (HIA) 2022-23, Kent Analytics, KCC

**Notes:**

- (1) Housing data relates to financial year (i.e. 2022-23 is the year up to 31st March 2023)
- (2) The first four 5-year time periods between 2003-23 show actual housing completions
- (3) The period 2023-28 shows expected housing completions (extant permissions and allocations)
- (4) No allocations data was provided for Sevenoaks District

\*Completions - Dwellings completed; Extant- Dwellings with planning permission but construction not yet completed; Allocations - Dwellings within an area designated for future housing development but not yet with planning permission

Figure 7b outlines the historic and forecast house building by district/borough. All districts/boroughs are planning for significant house building, each district/borough is at a different stage of adopting their Local Plan, the figures above incorporate housing numbers from adopted Local Plans, not every district currently has a Local Plan covering the period 2026-31, however our school-based forecasts incorporate all consented housing whether that housing was allocated within a Local Plan or not.

On average 5,936 dwellings were built annually in the ten-year period up to 31<sup>st</sup> March 2013. This increased significantly to 6,958 dwellings per year in period 2013-23, with a step change in housing completions seen during the latter 5 year period (38,601 completion). A long-term yearly average of around 9,500 dwellings per year is anticipated for the period 2023-28.

We need to ensure we are planning for the education infrastructure required. How we plan to provide for new housing is outlined in the individual district/borough sections. It is important to note that additional demand for school places from proposed housing plans that do not yet have planning permission or form part of a Borough's adopted Local Plan are not incorporated within the forecasts presented in Figures 7c to 7h. It is equally important to recognise that while surplus places might exist in districts, these will not always be in the right place to support demand generated by new housing.

### **6.3 Forecast Pupils in Mainstream Primary/Secondary Schools**

For Kent primary schools we have seen a steady rise in the overall number of pupils since 2009-10 to 2019-20, rising from 106,097 to 126,251. However, in 2020-21 the total primary roll saw a slight drop to 125,939, before increasing to 126,768 in 2021-22 and to 127,765 in 2022-23. The total pupil roll reduced slightly in 2023-24 to 127,446.

Figure 7c provides a breakdown of expected surplus or deficit capacity in Year R by district/borough across the ten-year period to 2032-33. The forecast indicates that there will be surplus places across the county for the Plan Period. However, in the individual district/borough sections we break down the expected surplus/deficit into smaller planning groups. This enables us to identify in more detail where and when provision may need to be added or removed at more local geography.

**Figure 7c: School-based surplus/deficit capacity summary (Year R) if No Further Action is Taken**

District	2023-24 capacity	2023-24 (A)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2033-24 (F)	2033-34 capacity
Ashford	1,730	334	218	258	253	337	329	321	317	313	311	306	1,715
Canterbury	1,544	130	254	177	183	253	266	278	288	296	305	315	1,530
Dartford	1,755	131	144	147	85	126	132	126	122	119	118	116	1,755
Dover	1,362	312	268	238	200	236	230	226	224	223	222	220	1,332
Folkestone & Hythe	1,288	208	278	242	230	291	293	295	295	297	297	297	1,266
Gravesham	1,536	176	117	118	88	119	124	132	140	145	151	154	1,486
Maidstone	2,134	140	122	170	72	98	101	89	82	77	75	71	2,154
Sevenoaks	1,502	245	307	209	252	353	349	347	348	349	351	355	1,467
Swale	2,060	206	307	249	232	247	244	239	235	233	231	225	1,995
Thanet	1,635	251	227	285	264	321	324	322	319	322	324	325	1,620
Tonbridge & Malling	1,772	287	252	191	203	260	252	237	230	227	228	229	1,728
Tunbridge Wells	1,296	99	89	126	129	166	170	171	172	174	177	180	1,321
<b>Kent</b>	<b>19,614</b>	<b>2,519</b>	<b>2,582</b>	<b>2,411</b>	<b>2,192</b>	<b>2,807</b>	<b>2,815</b>	<b>2,784</b>	<b>2,774</b>	<b>2,775</b>	<b>2,789</b>	<b>2,794</b>	<b>19,369</b>

Source: Management Information, Children, Young People and Education, KCC

The overall number of pupils in Kent secondary schools has risen since 2014-15, from 77,931 pupils to 93,349 in 2023-24, an increase in excess of 19% over a nine-year period. This has been driven by larger Year 6 cohorts entering the secondary sector and demand generated by housing development. We anticipate that the Year 7 rolls will continue to increase during the Plan Period. This level of need for Year 7 places will require significant further investment in the secondary estate to maintain sufficiency of places and will continue to represent a major challenge to the Council and its commissioning partners in the years to come.

Figures 7d and 7e provide a breakdown of expected surplus or deficit capacity in Year 7 by non-selective and selective planning groups, across the 10-year period to 2033-33. Many districts/boroughs are showing a need for additional non-selective Year 7 places at some point in the forecast period. Within the selective sector we forecast (Figure 7e) a similar pattern of deficits of Year 7 places throughout the forecast period for the many of planning groups. In part this has been due to selective schools accepting over PAN for a number of years rather than cohorts growing significantly.

The need for additional places can in-part be managed through existing schools increasing the number of places offered on a temporary or permanent bases, but not all of the pressure can be managed this way, consequentially there will be a need for new schools or satellites of existing schools. The individual district/borough sections break down the expected surplus/deficit of places into smaller planning for both selective and non-selective.



**Figure 7d: Non-selective school-based surplus/deficit capacity summary (Year 7) if No Further Action is Taken**

Planning Group name	2023-24 capacity	2023-24 (A)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2033-34 (F)	2033-34 capacity
Ashford North	960	2	-62	18	-40	-49	-76	-81	64	-6	33	19	938
Canterbury City	710	47	16	10	-12	-69	-70	-67	-71	-56	-97	-108	680
Canterbury Coastal	618	-14	34	43	26	28	52	21	34	107	98	102	618
Tenterden and Cranbrook	360	73	73	58	42	36	31	25	40	24	22	27	360
Dartford and Swanley	1,320	7	4	71	76	15	-36	2	-6	30	24	-16	1,440
Dover	510	75	18	11	1	-15	3	26	40	51	48	25	420
Deal and Sandwich	435	47	27	34	33	13	16	15	56	41	37	26	425
Folkestone and Hythe	625	17	-30	-12	-4	-35	-24	12	-2	59	41	17	595
Faversham	210	26	9	23	14	-22	-14	-11	-29	-10	-30	-36	210
Gravesham and Longfield	1,370	-42	-36	-43	-64	-113	-117	-100	-88	-119	-114	-118	1,389
Maidstone District	1,620	-12	-107	-129	-151	-194	-254	-315	-264	-260	-210	-299	1,560
Malling	543	43	44	61	67	17	36	33	59	40	64	55	543
Romney Marsh	180	-14	-10	-8	13	9	-8	7	9	19	21	28	180
Sevenoaks and Borough Green	610	-25	-31	22	-15	11	5	13	16	59	11	32	630
Isle of Sheppey	390	71	39	34	34	28	34	22	30	54	74	70	330
Sittingbourne	810	-29	-64	-92	-72	-162	-123	-110	-133	-51	-50	-61	765
Thanet District	1,159	1	-16	-26	-29	-30	-14	-65	43	25	72	58	1,099
Tonbridge and Tunbridge Wells	1,584	64	116	154	63	92	55	34	124	104	81	109	1,612
<b>Kent</b>	<b>14,014</b>	<b>337</b>	<b>24</b>	<b>228</b>	<b>-20</b>	<b>-439</b>	<b>-502</b>	<b>-540</b>	<b>-79</b>	<b>113</b>	<b>123</b>	<b>-70</b>	<b>13,794</b>

Source: Management Information, Children, Young People and Education, KCC

**Figure 7e: Selective school-based surplus/deficit capacity summary (Year 7) if No Further Action is Taken**

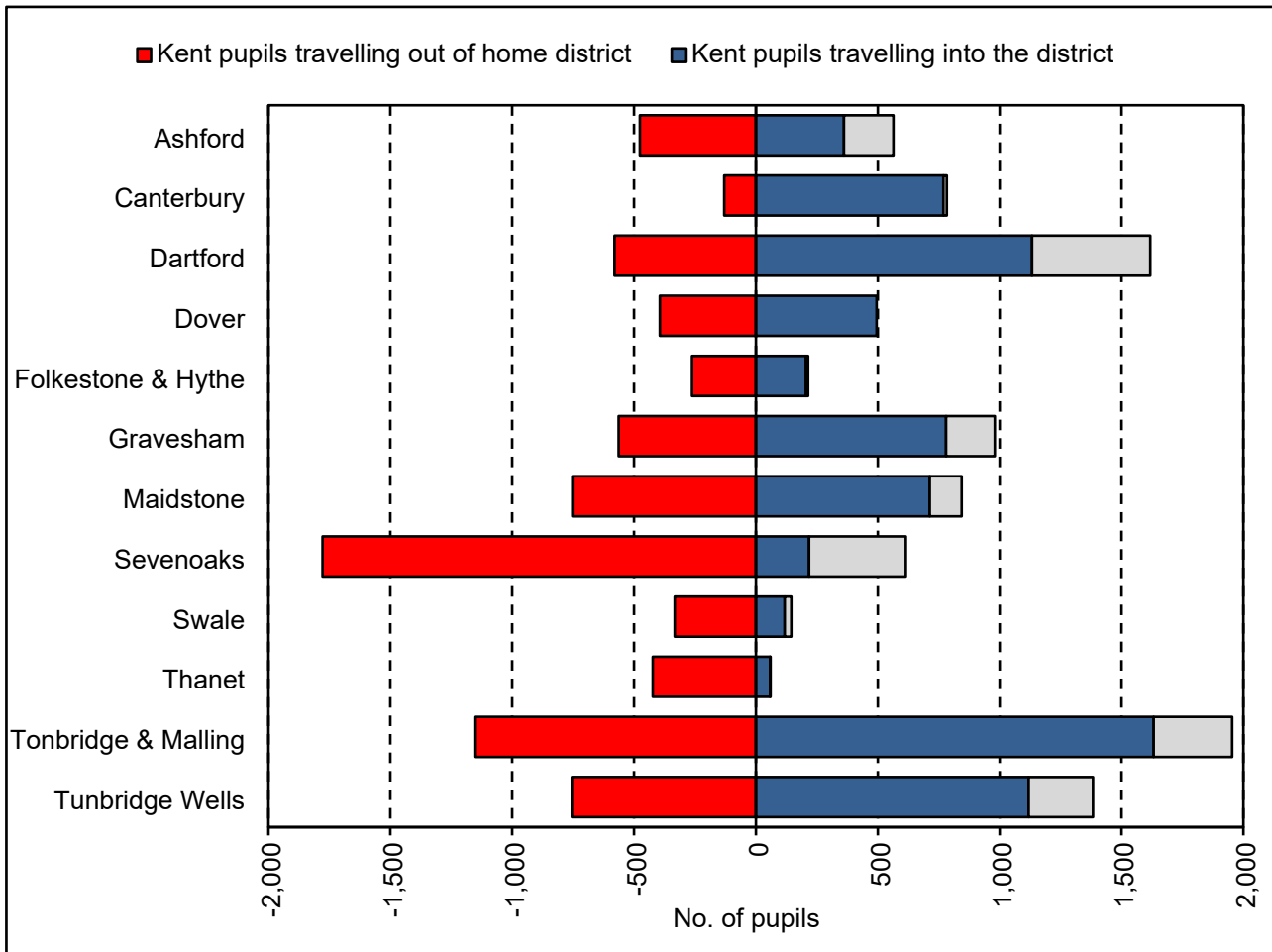
Planning Group name	2023-24 capacity	2023-24 (A)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2033-34 (F)	2033-34 capacity
Ashford	420	-13	5	22	-6	-10	-21	-25	22	-9	4	-3	420
Canterbury and Faversham	645	-15	6	20	5	-47	-35	-36	-39	-2	-31	-37	645
North West Kent	720	-1	-10	-26	-45	-70	-80	-73	-68	-47	-40	-63	720
Dover District	440	-5	7	20	6	2	-2	8	31	37	29	6	440
Folkestone & Hythe District	360	-3	27	25	22	26	23	25	23	22	23	27	330
Gravesham and Longfield	420	-16	-23	-45	-50	-68	-70	-67	-66	-77	-75	-78	420
Sittingbourne and Sheppey	270	-9	20	18	24	-3	15	9	8	36	39	34	300
Thanet District	345	7	8	5	5	6	17	-4	26	23	34	36	345
Maidstone and Malling	815	6	37	27	20	-8	-25	-50	-24	-32	-14	-47	815
West Kent	1,270	-23	-33	19	-46	-20	-29	-12	37	61	51	71	1,264
Cranbrook	90	-1	20	23	18	8	10	9	7	9	0	0	90
<b>Kent</b>	<b>5,795</b>	<b>-73</b>	<b>64</b>	<b>108</b>	<b>-46</b>	<b>-182</b>	<b>-198</b>	<b>-215</b>	<b>-42</b>	<b>22</b>	<b>20</b>	<b>-55</b>	<b>5,789</b>

Source: Management Information, Children, Young People and Education, KCC

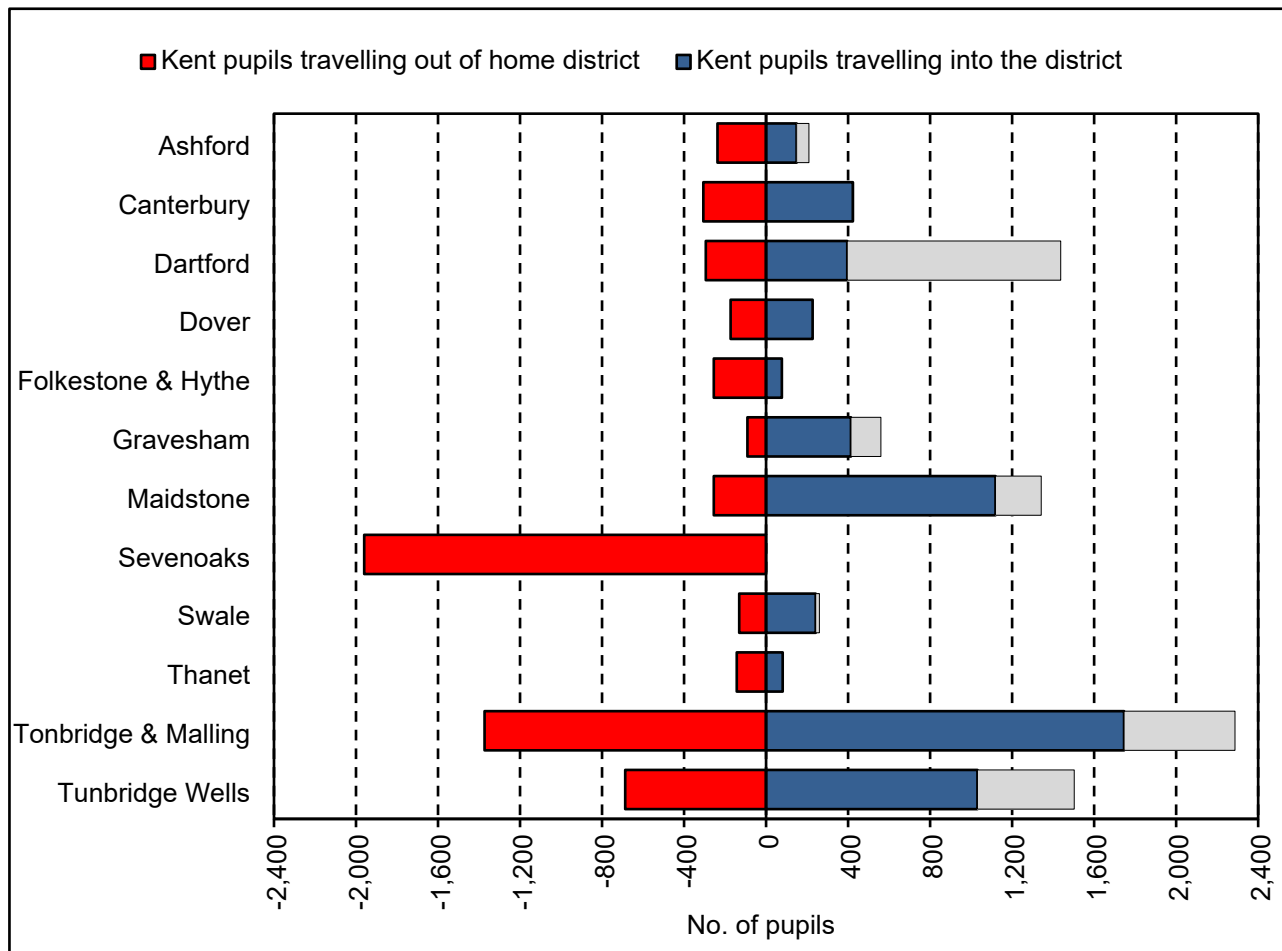
### 6.4 Travel to School Flows

Figures 7f and 7g outline the travel to school flows for selective and non-selective provision in Kent districts. There are big differences between both the scale of travel to school flows and the direction of flows between districts; for example, Sevenoaks has a net outflow of circa 3,500 pupils across the selective and non-selective sectors combined (excluding out of county pupils), whereas Maidstone has a net inflow of over 820 pupils. Dartford had the highest number of out of county pupils with over 1,500 traveling from adjacent boroughs. Tunbridge Wells has a high flow of pupils into the District particularly to access both non-selective denominational provision and selective provision. Tonbridge and Malling has high flows into and out of the District for both selective and non-selective provision.

**Figure 7f: Travel to school flows for non-selective pupils (years 7-11) in Kent mainstream schools (Autumn 2023)**



**Figure 7g: Travel to school flows for selective grammar pupils (years 7-11) in Kent mainstream schools (Autumn 2023)**



Source: Management Information, Children, Young People and Education, KCC

**Notes:**

- (1) Actual roll data 2023-24 - Schools Census, Autumn 2023
- (2) Data excludes Duke of York's Royal Military School, Dover
- (3) The Sevenoaks Annex of Weald of Kent Grammar School is treated as being located in Tonbridge & Malling
- (4) The Sevenoaks Annex of Tunbridge Wells Grammar School for Boys is treated as being located in Tunbridge Wells

## 6.5 Migration into Kent

Figure 7h sets out the net migration by pre-school, primary school and secondary school ages for 2021 and 2022. This table indicates a reduction in the annual inwards migration for the pre-school, but a notable increase in both primary and secondary migration.

**Figure 7h: Pre-school (0-3 year olds), primary (4-10 year olds) and secondary aged (11-15 year olds) net migration year ending 30th June 2022**

District	2021				2022			
	Kent districts*	London	Elsewhere	Total	Kent districts*	London	Elsewhere	Total
Pre-school	-19	1,593	-404	1,170	40	1,330	-349	1,020
Primary	124	2,188	-467	1,845	139	2,322	-373	2,088
Secondary	104	943	-172	875	31	1,152	-122	1,061

\*Source: Office for National Statistics, Table IM2020-22

**Note:**

For the purposes of this analysis Kent districts include Medway UA

Across the County as a whole, any fluctuation in migration may only have a small proportional impact on pupil numbers. However, at a district/borough level the fluctuation from one year to the next can be significant requiring the LA to respond swiftly to ensure sufficient school places.

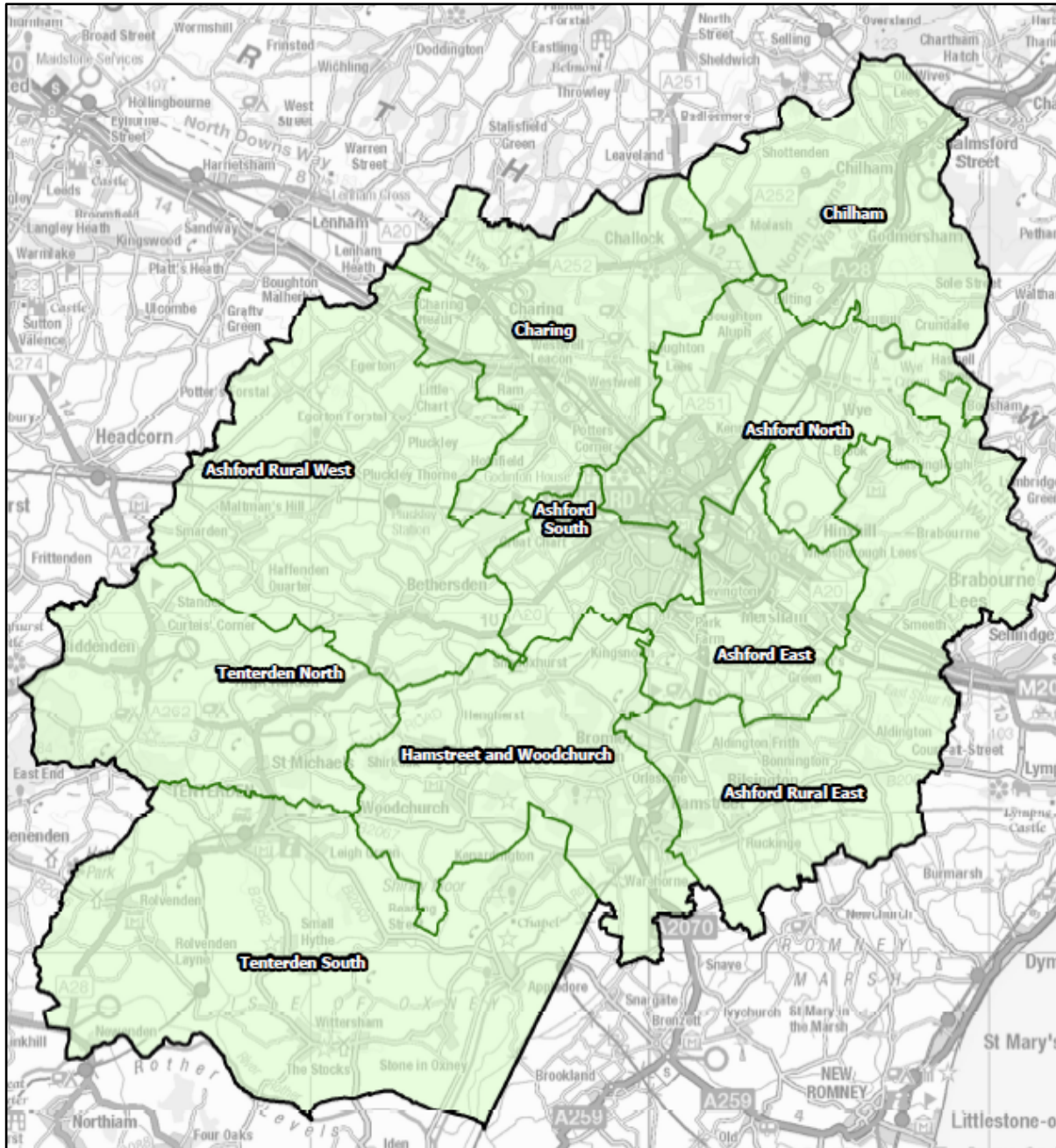
## 7. Commissioning Statutory School Provision by Districts

### 7.1. Ashford

#### Borough Commentary

- The birth rate in Ashford declined between 2016 and 2019, levelled out from 2020 to 2022, before dropping significantly in 2023. However, it remains above the County and National averages. The number of recorded births increased by 26 in 2022 before falling by 77 births in 2023.
- We forecast an increasing surplus of primary school places across the District throughout the Plan period, although there could be some localised pressures which may need to be addressed with localised solutions.
- Forecasts suggest a deficit of Year 7 places for September 2024 and then from 2026/27 for four years. We will work with existing schools to ensure that there are sufficient Year 7 places for all who require one.
- The Local Plan (up to 2030) was adopted in the first quarter of 2019. Within the Plan, the Borough Council have identified that up to 13,544 new homes could be delivered by 2030. This equates to an average of 1,129 new homes per annum. During the period 2013/14 to 2022/23 an average of 718 homes were completed per annum (Kent Analytics Statistical Bulletin April 2024).

## Map of the Ashford Borough primary planning groups



## Ashford primary schools by planning group

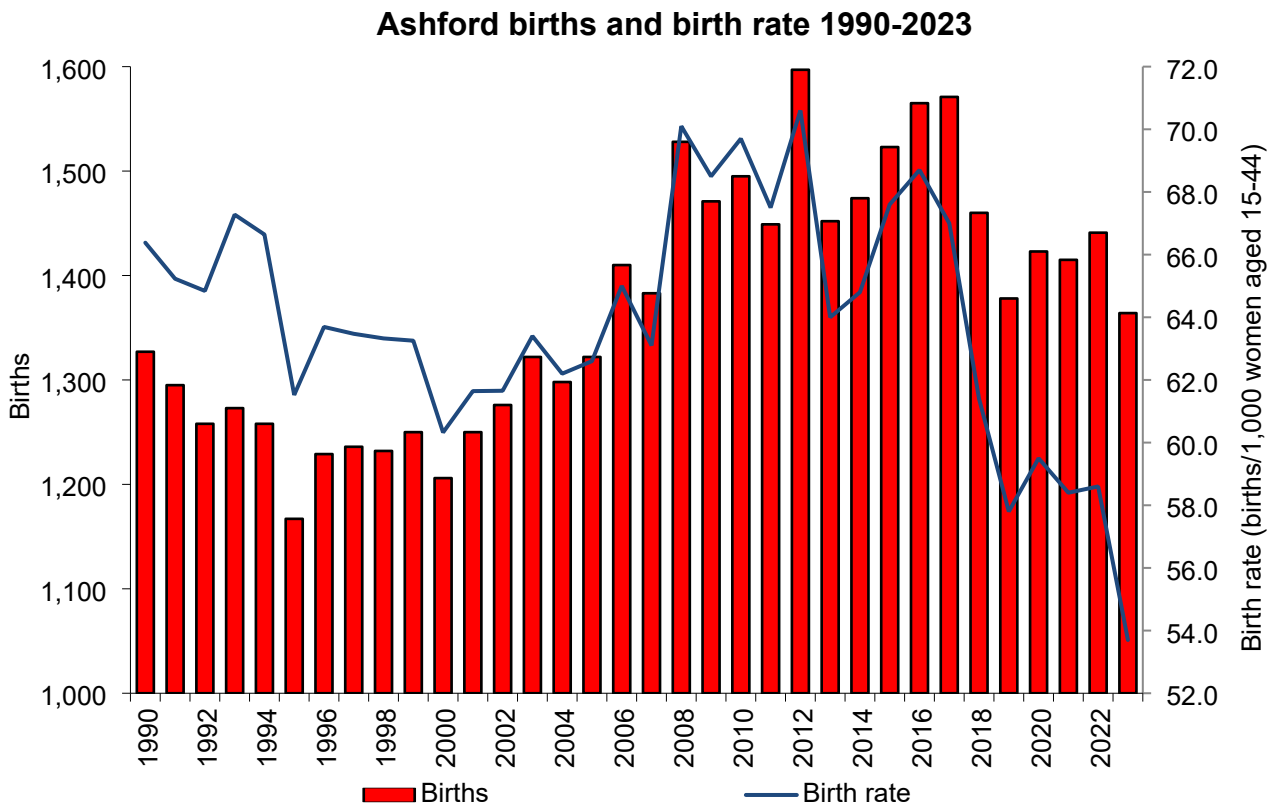
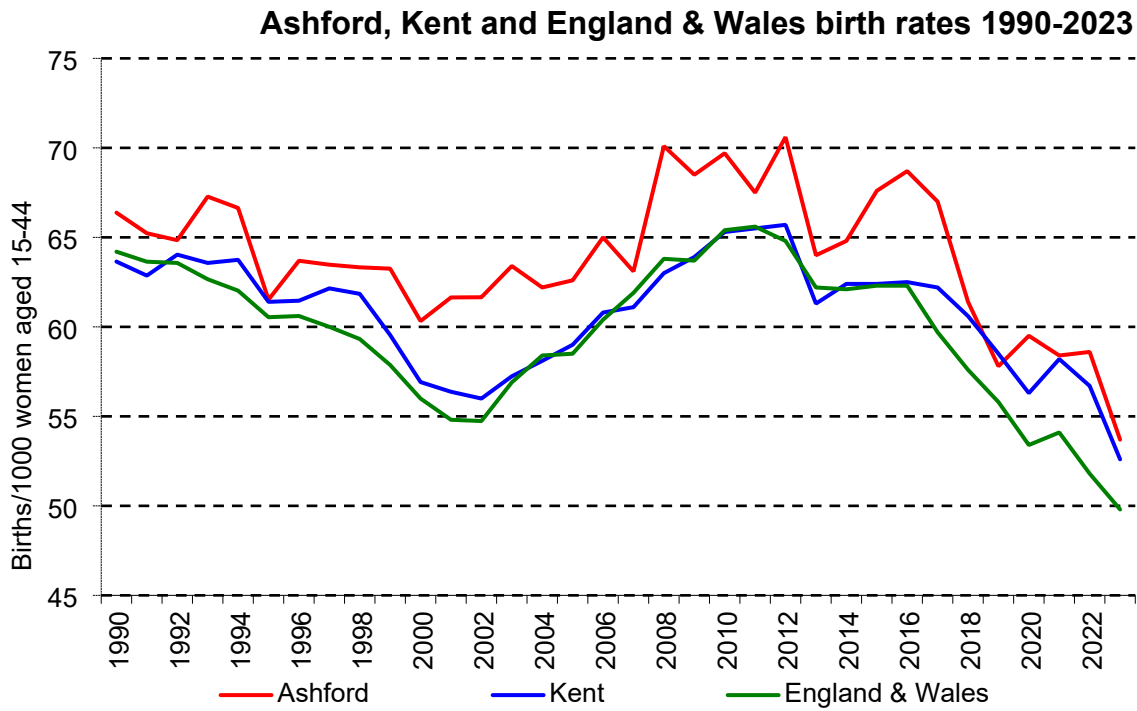
Planning Groups	School	Status
Chilham	St. Mary's CE Primary School (Chilham)	Voluntary Controlled
Charing	Challock Primary School	Foundation
	Charing CE Primary School	Academy
Ashford North	Downs View Infant School	Community
	Goat Lees Primary School	Foundation
	Godinton Primary School	Academy
	Kennington CE Academy	Academy
	Lady Joanna Thornhill Endowed Primary School	Voluntary Controlled
	Phoenix Community Primary School	Foundation
	Repton Manor Primary School	Foundation
	St. Mary's CE Primary School (Ashford)	Voluntary Aided
St. Teresa's RC Primary School	Academy	

Planning Groups	School	Status
	Victoria Road Primary School	Community
Ashford Rural East	Aldington Primary School	Foundation
	Brabourne CE Primary School	Voluntary Controlled
	Brook Community Primary School	Foundation
	Smeeth Community Primary School	Foundation
Ashford East	East Stour Primary School	Academy
	Finberry Primary School	Academy
	Furley Park Primary Academy	Academy
	Kingsnorth CE Primary School	Academy
	Mersham Primary School	Foundation
	Willesborough Infant School	Community
	Willesborough Junior School	Foundation
Ashford South	Ashford Oaks Primary School	Community
	Beaver Green Primary School	Academy
	Chilmington Green Primary School	Free
	Great Chart Primary School	Community
	John Wallis CE Academy	Academy
	John Wesley CE and Methodist Primary School	Voluntary Aided
	St. Simon of England RC Primary School	Academy
Ashford Rural West	Bethersden School	Community
	Egerton CE Primary School	Voluntary Controlled
	Pluckley CE Primary School	Academy
	Smarden Primary School	Academy
Hamstreet and Woodchurch	Hamstreet Primary Academy	Academy
	Woodchurch CE Primary School	Voluntary Controlled
Tenterden North	High Halden CE Primary School	Voluntary Controlled
	John Mayne CE Primary School	Academy
	St. Michael's CE Primary School	Academy
Tenterden South	Rolvenden Primary School	Academy
	Tenterden CE Junior School	Academy
	Tenterden Infant School	Academy
	Wittersham CE Primary School	Voluntary Aided



## Birth rate and births analysis

The charts below set out the birth rates for the Borough and the number of recorded births.



## Ashford Forecasts

### Primary - Year R surplus/deficit capacity if no further action is taken

Planning Group name	2023-24 capacity	2023-24 (A)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-34 (F)	2033-34 capacity
Chilham	15	2	5	6	4	6	6	6	6	6	6	6	15
Challock and Charing	50	-4	0	-5	1	-4	-6	-6	-6	-6	-6	-7	50
Ashford North	450	70	46	47	73	80	77	72	69	66	63	60	450
Ashford Rural East	80	22	21	18	12	21	21	21	21	21	21	21	80
Ashford East	420	108	42	90	50	74	72	69	66	63	61	58	420
Ashford South	390	69	70	77	76	121	122	122	123	123	124	124	390
Ashford Rural West	95	17	2	-4	-3	-3	-3	-3	-2	-1	0	1	80
Hamstreet and Woodchurch	71	15	14	12	12	17	15	14	13	13	12	12	71
Tenterden North	65	12	8	7	6	14	14	14	14	15	15	16	65
Tenterden South	94	23	9	11	23	12	12	13	13	14	15	16	94
<b>Ashford</b>	<b>1,730</b>	<b>334</b>	<b>218</b>	<b>258</b>	<b>253</b>	<b>337</b>	<b>329</b>	<b>321</b>	<b>317</b>	<b>313</b>	<b>311</b>	<b>306</b>	<b>1,715</b>

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### Secondary - Forecast Year 7 surplus/deficit capacity if no further action is taken

Planning Group name	2023-24 capacity	2023-24 (A)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-34 (F)	2033-34 capacity
NS - Ashford North	960	2	-62	18	-40	-49	-76	-81	64	-6	33	19	938
NS - Tenterden and Cranbrook	360	73	73	58	42	36	31	25	40	24	22	27	360
SG - Ashford	420	-13	5	22	-6	-10	-21	-25	22	-9	4	-3	420

## **Primary Borough Commentary**

Across the Borough, we forecast a significant surplus of primary school places during the Plan period. In the short to medium term, we will collaborate with schools to manage the high levels of surplus primary school places to help maintain high quality, sustainable provision.

### **Charing and Challock Planning Group**

Forecasts suggest a small deficit of primary school places throughout the Plan period. This is primarily due to Charing Church of England Primary School taking over their published admissions numbers in some year groups, which they are free to do as their own admissions authority. Additionally, the forecasts consider the impact of consented development in the planning group.

The expansion of Charing CE Primary School continues to be the strategic solution for additional primary school places. The expansion of the school will be driven by consented housing developments. The nutrient neutrality 'Stodmarsh' issue is impacting these developments being able to progress. Therefore, it is not expected that school places will be required until the end of the decade.

### **Ashford North Planning Group**

Forecasts suggest surplus places from 2023/24 until the end of the decade. In the longer term, planned new developments north of the M20 between Kennington, Willesborough and Eureka Park will increase demand. To address the need for primary school places to support new housing in and around the planning group, the Local Plan makes provision for a new 2FE primary school to be incorporated into the 'Conningbrook Park' development. This development has only just started. The primary school land is expected during 2027 at the earliest. The school is likely to be required in the next decade.

### **Ashford East Planning Group**

Although forecasts suggest a significant level of surplus places across the plan period, additional provision may be required to support housing development as this comes forward. This includes: Finberry, Waterbrook, New Town Works, Park Farm, Court Lodge, Pound Lane and Willesborough Lees.

The Local Plan makes provision for a new 2FE primary school to be incorporated into the 'Court Lodge' development area to meet the longer-term primary education needs driven by that development. We would not expect the new primary school to be available until the latter part of this decade.

### **Ashford South Planning Group**

Forecasts suggest increasing surplus Year R places across the Plan period from 2027 onwards. The surplus capacity will reduce when delivery of consented houses within Chilmington Green increases.

### **Ashford Rural West Planning Group**

Forecasts suggest a small deficit of places in this planning group from the 2025/26 academic year. This is due to an academy offering over their Published Admissions Number for several years, which they are free to do as their own admissions authority, and drawing pupils from further afield. The academy has ended this practice, thus we anticipate the forecast deficit not materialising.

### **Hamstreet and Woodchurch planning group**

Developer contributions have been sought to enable Hamstreet Primary Academy to expand by 0.5FE when required to meet the need of new housing in the village. The position will be monitored.

### **Secondary Borough Commentary**

There are three planning groups which are within Ashford Borough or which cross the Borough boundary (See appendix 13.2 for the non-selective and selective planning group maps). Two planning groups are non-selective (Ashford North, Tenterden and Cranbrook), one selective. The commentary below outlines the forecast position for each of the planning groups.

### **Ashford North Non-Selective Planning Group**

There are five existing schools in the Ashford North non-selective planning group: John Wallis Church of England Academy, The North School, The Towers School and Sixth Form Centre, Wye School and Chilmington Green Secondary School (opened off-site in September 2023).

Forecasts suggest a deficit of Year 7 places for September 2024 and then from 2026/27 for four years. We will work with existing schools to ensure that there are sufficient Year 7 places for all who require one.

### **Tenterden and Cranbrook Non-Selective Planning Group**

The opening of Chilmington Green Secondary School and the addition of temporary places in existing Ashford and Tunbridge Wells schools has changed the flow of pupils in this planning group following the closure of High Weald Academy by the DfE and ensured sufficient places are available.

### **Ashford Selective Planning Group**

There are two selective schools in the Borough: Highworth Grammar School and The Norton Knatchbull Grammar School. Forecasts suggest that there will be a small deficit of places throughout, but we anticipate that this could be managed within the existing schools

## Planned Commissioning – Ashford

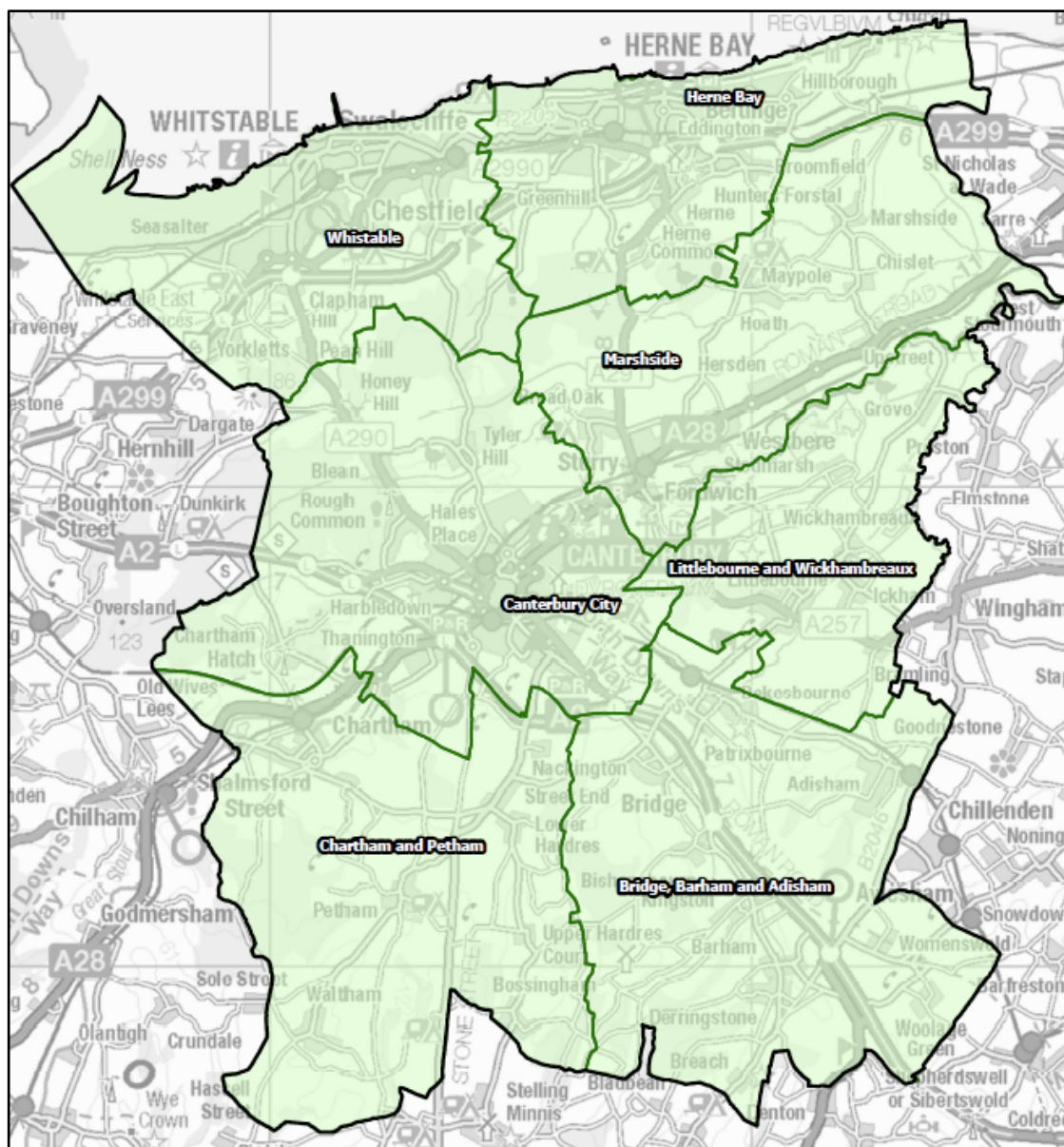
Planning Group	By 2025-26	By 2026-27	By 2027-28	By 2028-29	Between 2029-32	Post 2032
Ashford East					2FE of new provision at Court Lodge	
Ashford North					2FE New provision at Conningbrook Park	
Charing				0.3FE Charing CEPS		
Hamstreet and Woodchurch					0.5FE Hamstreet Primary Academy	
Ashford South						2FE of new provision at Chilmington Green
Ashford North Non-Selective	Additional 2FE (60 places) Chilmington Green					2FE Expansion of Chilmington Green

## 7.2. Canterbury

### District commentary

- The Canterbury district birth rate differs to Kent and the national picture as it is significantly lower, reflecting the large student population. The birth rate has had a downward trend since the 1990s. However, following a sharp fall in 2020, Canterbury's birth rate and the number of births rose again in 2021, before falling back slightly in 2022 and 2023.
- We forecast surplus primary school places across the District throughout the forecast period, however there are significant differences in the planning groups. Localised pressures are shown in a number of the canterbury planning groups whilst there is spare capacity in the coastal planning groups.
- Within the secondary sector, we forecast pressures on capacity for non-selective in Canterbury City planning group but capacity in the Canterbury Coastal planning group. For selective places there is surplus capacity until 2027/28 after this date a pressure on places is forecast.
- Canterbury City Council's current Local Plan, adopted on 13 July 2017, proposed a total of just over 16,000 new homes during the Plan period up to 2031. This equates to an average of 925 dwellings per annum. During the 2013/14 to 2022/23 a total of 4627 houses were completed (NET) with an average of 463 per year.
- Canterbury City Council (CCC) is in the process of preparing a new Local Plan for the district which will set out the blueprint for development up to 2040. Following previous consultations in 2020, 2021 and 2022, CCC consulted on a revised Regulation 18 draft Local Plan in Spring 2024. CCC is currently reviewing the representations received to the consultation and will be preparing a Regulation 19 Local Plan for consultation in 2025, before the plan is examined by an inspector and a final decision is made.

## Map of the Canterbury Primary Planning Groups



## Canterbury Primary Schools by Planning Group

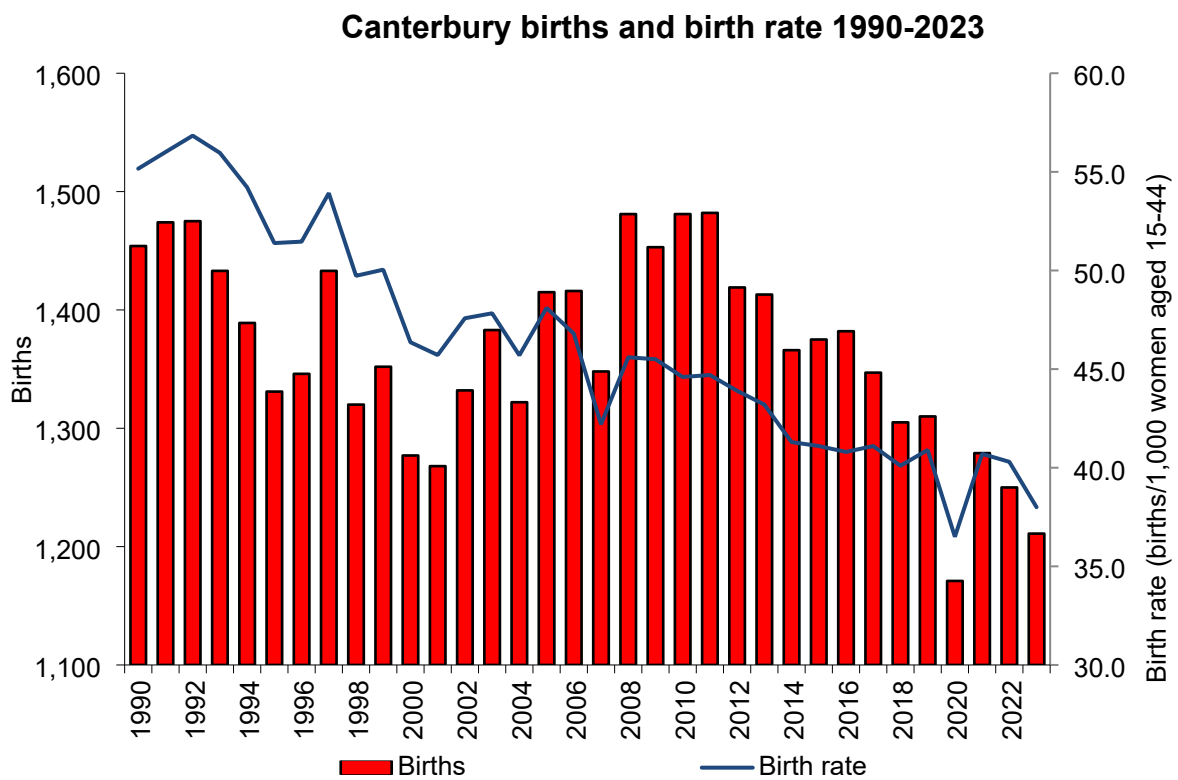
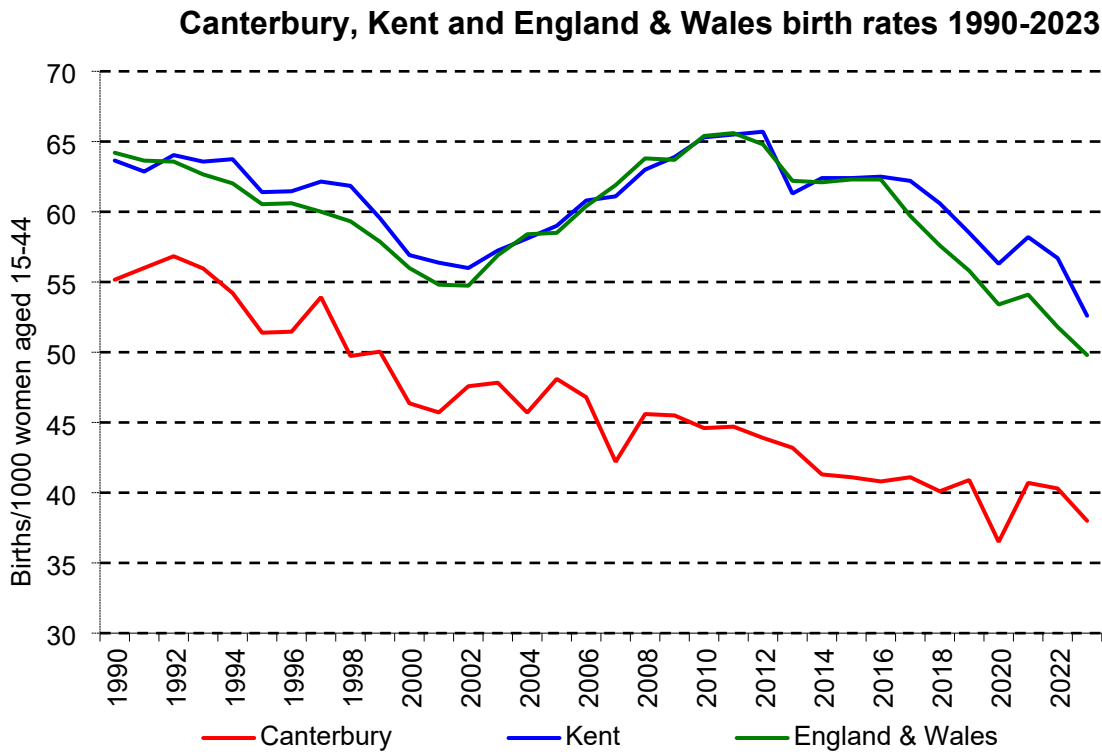
Planning Group	School	Status
Canterbury City	Blean Primary School	Community
	Canterbury Primary School	Academy
	Parkside Community Primary School	Foundation
	Pilgrims' Way Primary School	Academy
	St. John's CE Primary School (Canterbury)	Voluntary Controlled
	St. Peter's Methodist Primary School (Canterbury)	Voluntary Controlled
	St. Stephen's Infant School	Academy
	St. Stephen's Junior School	Academy
	St. Thomas' RC Primary School (Canterbury)	Voluntary Aided
	Wincheap Foundation Primary School	Foundation
Marshside	Chislet CE Primary School	Voluntary Controlled
	Water Meadows Primary School	Academy
	Hoath Primary School	Community
	Sturry CE Primary School	Academy
Bridge, Barham and Adisham	Adisham CE Primary School	Academy

Planning Group	School	Status
	Barham CE Primary School	Voluntary Controlled
	Bridge and Patixbourne CE Primary School	Voluntary Controlled
Littlebourne and Wickhambreaux	Littlebourne CE Primary School	Voluntary Controlled
	Wickhambreaux CE Primary School	Voluntary Controlled
Chartham and Petham	Chartham Primary School	Academy
	Petham Primary School	Academy
Whitstable	Joy Lane Primary School	Foundation
	St. Alphege CE Infant School	Voluntary Controlled
	St. Mary's RC Primary School (Whitstable)	Academy
	Swalecliffe Community Primary School	Foundation
	Westmeads Community Infant School	Community
	Whitstable and Seasalter Endowed CE Junior School	Voluntary Aided
	Whitstable Junior School	Foundation
Herne Bay	Thornden Wood Primary School	Academy
	Hampton Primary School	Academy
	Herne Bay Infant School	Community
	Herne Bay Junior School	Foundation
	Herne CE Infant School	Voluntary Controlled
	Herne CE Junior School	Voluntary Aided
	Reculver CE Primary School	Academy



## Birth Rate and Birth Analysis

The charts below set out the birth rates for the district and the number of recorded births.



## Canterbury Forecasts

### Primary - Year R Surplus/Deficit Capacity if No Further Action is Taken

Planning Group name	2023-24 capacity	2023-24 (A)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-34 (F)	2033-34 capacity
Canterbury City	465	22	46	20	21	35	44	55	68	84	104	125	480
Marshside	119	0	14	22	7	4	5	5	4	3	1	-1	120
Bridge, Barham and Adisham	105	3	2	-9	-5	-9	-11	-13	-15	-17	-19	-22	105
Littlebourne and Wickhambreaux	30	0	-3	-4	-2	-5	-6	-6	-6	-7	-8	-8	30
Chartham and Petham	75	6	16	17	9	16	17	18	18	18	18	17	75
Whitstable	360	77	115	76	94	123	126	129	129	129	128	126	330
Peirce Bay	390	22	65	56	60	90	91	90	89	85	82	77	390
<b>Canterbury</b>	<b>1,544</b>	<b>130</b>	<b>254</b>	<b>177</b>	<b>183</b>	<b>253</b>	<b>266</b>	<b>278</b>	<b>288</b>	<b>296</b>	<b>305</b>	<b>315</b>	<b>1,530</b>

### Secondary - Year 7 Surplus/Deficit Capacity if No Further Action is Taken

Planning Group name	2023-24 capacity	2023-24 (A)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-34 (F)	2033-34 capacity
Canterbury City Non-Selective	710	47	16	10	-12	-69	-70	-67	-71	-56	-97	-108	680
Canterbury Coastal Non-Selective	618	-14	34	43	26	28	52	21	34	107	98	102	618
Canterbury and Faversham Selective	645	-15	6	20	5	-47	-35	-36	-39	-2	-31	-37	645

## **Primary District Commentary**

Forecasts indicate that across Canterbury district there will be surplus capacity for Year R places. The surplus for Year R fluctuates throughout the forecast period from 177 (5.9FE) surplus for 2025/26 to 278 (9.2FE) for 2029/30 with significant variations across the different Planning Groups.

The lower rate of housebuilding combined with the decline in birth rate has resulted in surplus primary places, particularly in Herne Bay and Whitstable. Pressures in Bridge, Barham and Adisham and Littlebourne and Wickhambreaux Planning Groups are offset by surplus capacity in Canterbury City, Marshside and Chartham and Petham Planning Groups will help to realign historical travel patterns of pupils travelling out of Canterbury to attend a village school.

### **Canterbury City Planning Group**

Forecasts indicate a surplus of places in the planning group of between 0.6FE for Year R in 2025/26 increasing to 1.8FE in 2029/30. However, the first phase (1FE) of a new 2FE primary school in Thanington will be established to serve the new housing development of 750 homes in the planning group. This phased approach will prevent overcapacity in the planning area and help to realign historical travel patterns.

### **Marshside Planning Group**

Forecasts indicate a decreasing surplus of capacity from 0.7FE in 2025/26 to 0.1FE in 2029/30. Later in the forecast period, dependent on the order in which housing are built, we will expand Water Meadows Primary Academy by a form of entry or establish the first phase of a new 2FE primary school in Sturry/Broad Oak to serve the housing development in this planning group.

### **Littlebourne and Wickhambreaux Planning Group and Bridge, Barham and Adisham**

Forecasts indicate that there will be a slight growing pressure for Year R places within the planning groups. This is due to the significant number of families who traditionally travel into the planning groups for places. Later in the forecast period, dependent on new housing being brought forward in the planning group a 0.5FE expansion of Littlebourne Primary School will be commissioned.

### **Whitstable Planning Group**

Forecasts indicate a growing surplus of Year R places from 2.5FE in 2025/26 to 4.3FE in 2029/30. Discussions will take place with schools in the planning group on managing this surplus to ensure schools remain viable.

### **Herne Bay Planning Group**

Forecasts indicate a surplus capacity of between 1.8FE in 2025/26 to 3FE in 2029/30 for Year R places. If new housing developments are delivered in line with the Local Plan, additional capacity will need to be provided later in the plan period. Dependent on the order in which developments are built out, this could be delivered through a 1FE expansion of Thornden Wood Primary School or the phased establishment of a new 2FE primary school on the Hillborough development.

## **Secondary District Commentary**

There are three planning groups within Canterbury district, or which cross the Borough boundary (See appendix 13.2 for the non-selective and selective planning group maps). Two planning groups are non-selective (Canterbury City and Canterbury Coastal), one selective. The commentary below outlines the forecast position for each of the planning groups.

### **Canterbury City Non-Selective Planning Group**

There are four schools in the Canterbury City non-selective planning group: Archbishop's School, Barton Manor, Canterbury Academy, and St Anselm's Catholic School.

Forecasts indicate a pressure of -0.4FE from 2026/27 which increases to -2.2FE in 2029/30. The historical trend of students travelling from the Coastal planning group to Canterbury city schools places pressures on the Canterbury City planning group. The surplus capacity in the Coastal planning group will help offset the pressures in Canterbury city schools and will realign students to the coastal schools near to where they live. Any additional pressures within Canterbury City planning group will be met by temporary or permanent expansions.

### **Canterbury Coastal Non-Selective Planning Group**

There are three schools in the Canterbury Coastal non-selective planning group: The Whitstable School, Herne Bay High School and Spires Academy.

Year 7 forecasts indicate a fluctuating surplus places of between 43 places (1.43FE) in 2025/26 to 21 (0.7FE) places in 2029/30. The historical trend of students travelling from the coast to Canterbury city is starting to change and the surplus capacity in the coastal schools will help offset the pressures in Canterbury City planning group.

### **Canterbury and Faversham Selective Planning Group**

There are four schools in the Canterbury and Faversham selective planning group: Barton Court Grammar School, Simon Langton Girl's Grammar School, Simon Langton Grammar School for Boys and Queen Elizabeth's Grammar School.

Forecasts indicate a surplus of places in the planning group until 2027. From 2027/28 there is a pressure forecast in the planning group of between -1.2FE and 1.5FE for Year 7 places across the Plan period. Feasibilities will be undertaken at Simon Langton Girls School to expand the school.

## Planned Commissioning - Canterbury

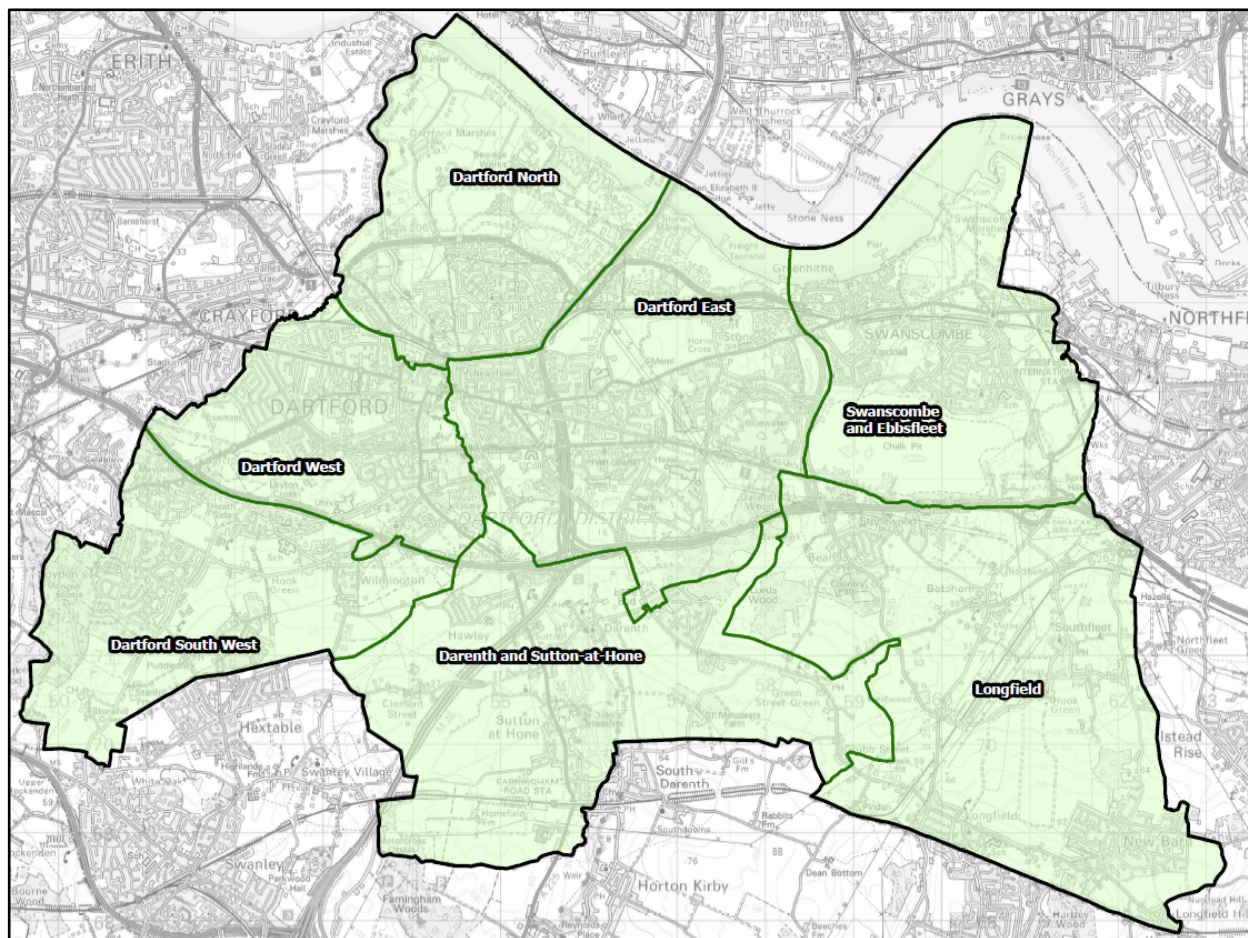
Planning Group	By 2025-26	By 2026-27	By 2027-28	By 2028-29	Between 2029-32	Post 2032
Canterbury City		1FE of a new Primary School in Thanington				2 <sup>nd</sup> FE of Thanington Primary School
Marshside					1FE expansion of Water Meadows or 1 <sup>st</sup> 1FE of new provision in Sturry/ Broad Oak	
Herne Bay					1FE expansion of Thornden Wood PS or 1FE new provision in Herne Bay	
Canterbury City Non- Selective			Up to 1FE temporary places	Up to 1 FE temporary places	Up to 1.5FE temporary places	
Canterbury and Faversham Selective			1FE expansion of Simon Langton Girls School			
Special School		New 120 place Special School on the coast				
Alternative Provision		Proposed Key stage 3 expansion of The Rosewood School				

## 7.3. Dartford

### Borough Summary

- The Dartford birth rate continues to fall, although it remains significantly higher than the Kent and National averages.
- Primary forecasts indicate surpluses of around 5 FE in the first year of the Plan period. The surplus drops slightly for September 2026, but increases and remains steady to about 4FE over the remainder of the Plan period.
- For much of the Plan period in the Dartford and Swanley Non-Selective planning group, there is a small surplus. This turns into a deficit of 1FE in September 2028, before returning to a small surplus a year later. The Gravesham and Longfield Non-Selective planning group shows 1.5FE deficit from the outset. The deficit increases year on year, peaking at nearly 4FE for September 2028. The deficit remains high for the remainder of the plan period, ranging from 3FE to 4FE. It then remains at that level of deficit for the duration of the Plan period.
- Selective demand in the North West Kent Selective Planning Group is under pressure throughout the whole Plan period, with the deficit peaking at 2.5FE for September 2028. It then remains at 1.5FE - 2.5FE for the duration of the Plan period. The Gravesham and Longfield Selective Planning Group forecasts shows a similar level of deficit, at about 2.5FE for September 2028. Any options for creating additional selective capacity will be extremely challenging and KCC may only be able to ensure that the Local Authority statutory duty to provide sufficient secondary places, of any type, is met.
- Dartford Borough Council (DBC) and the Ebbsfleet Development Corporation (EDC) had estimated that up to 2026, approximately 17,300 new homes would be built. The build trajectory to achieve that had slipped due to covid but is now moving apace.
- More recently, the EDC has said that 15,000 new homes will be built in their area of responsibility alone. Not all of this new housing has been consented and so it will not appear in the forecasts. KCC is working in collaboration with DBC and EDC to ensure that sufficient places are available to accommodate the children from the new housing, even if it does not feature in the forecasts.

## Map of the Dartford Primary Planning Groups



## Dartford Primary Schools by Planning Group

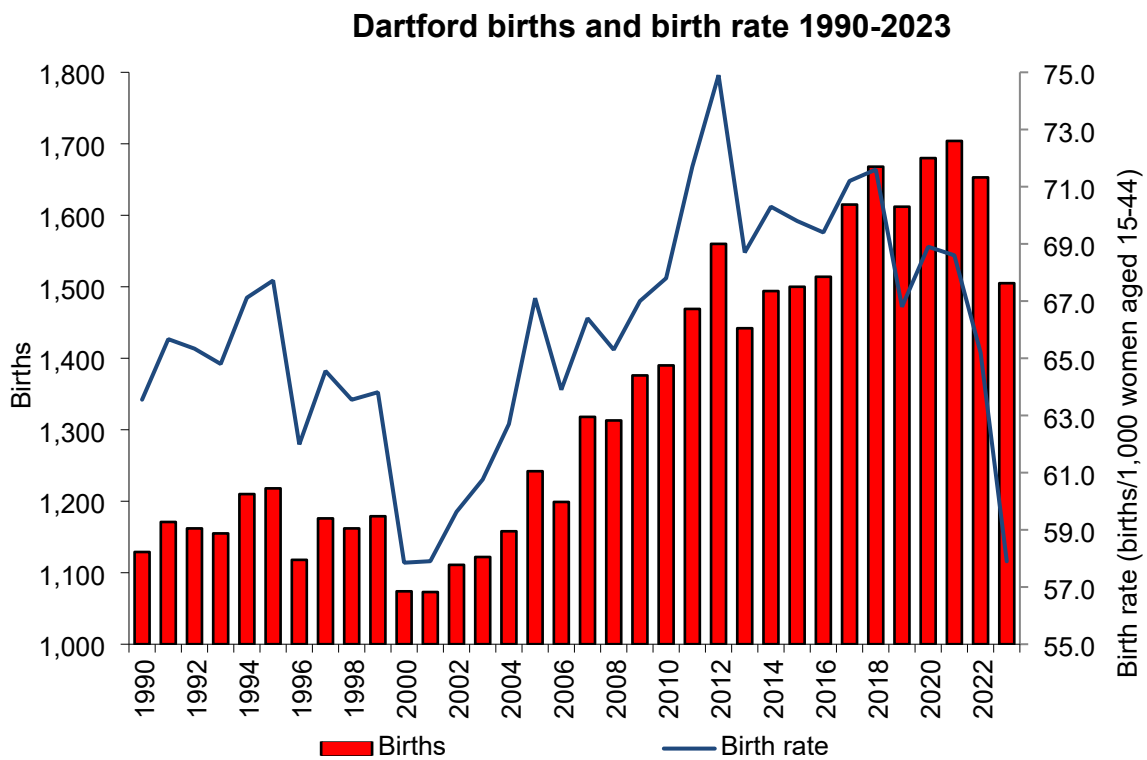
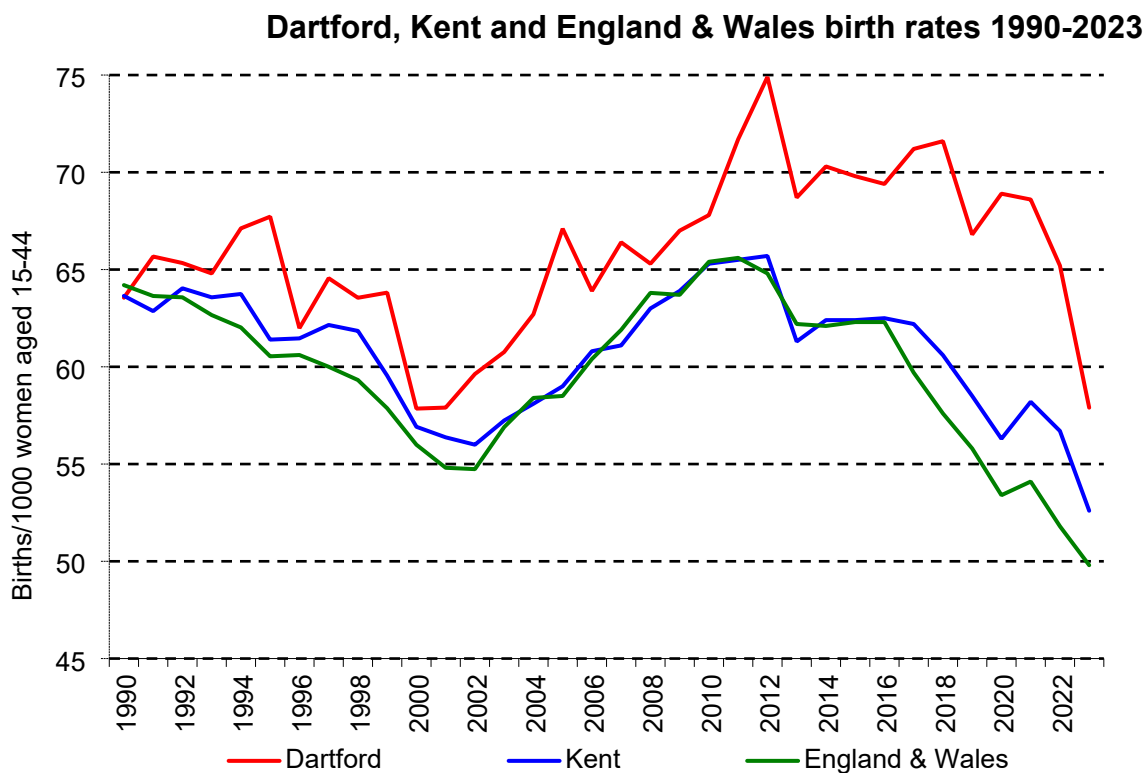
	School	Status
Dartford North	Dartford Bridge Community Primary School	Academy
	Holy Trinity CE Primary School (Dartford)	Voluntary Aided
	River Mill Primary School	Free
	St. Anselm's RC Primary School	Academy
	Temple Hill Primary Academy	Academy
Dartford West	Oakfield Primary Academy	Academy
	Our Lady's RC Primary School	Voluntary Aided
	Wentworth Primary School	Academy
	West Hill Primary Academy	Academy
	Westgate Primary School	Academy
Dartford East	Brent Primary School	Academy
	Leigh Academy Dartford	Academy
	Fleetwork Primary School	Academy
	Gateway Primary Academy	Academy
Dartford South West	Stone St. Mary's CE Primary School	Academy
	Joyden's Wood Infant School	Academy
	Joyden's Wood Junior School	Academy
	Maypole Primary School	Academy
Darenth and Sutton-at-Hone	Wilmington Primary School	Academy
	Greenlands Primary School	Academy
	Sutton-at-Hone CE Primary School	Academy

	<b>School</b>	<b>Status</b>
Swanscombe and Ebbsfleet	Leigh Academy Cherry Orchard	Academy
	Craylands School	Community
	Ebbsfleet Green Primary School	Free
	Knockhall Primary School	Academy
	Manor Community Primary School	Academy
Longfield	Bean Primary School	Community
	Langafel CE Primary School	Voluntary Controlled
	Sedley's CE Primary School	Academy



## Birth Rate Analysis

The charts below set out the birth rates for the Borough and the number of recorded births.



## Dartford Forecasts

### Primary - Year R Surplus/Deficit Capacity if No Further Action is Taken

Planning Group name	2023-24 capacity	2023-24 (A)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-34 (F)	2033-34 capacity
Dartford North	330	21	55	52	47	66	60	52	44	37	30	23	330
Dartford West	315	7	14	35	-1	20	25	28	31	34	37	39	315
Dartford East	390	10	2	10	-12	1	3	3	3	3	4	5	390
Dartford South West	180	17	23	19	25	47	49	51	53	54	57	59	180
Darenth and Sutton-at-Hone	90	15	18	13	18	20	22	23	24	25	27	28	90
Swanscombe and Ebbsfleet	360	50	28	12	-1	-38	-40	-45	-49	-54	-58	-62	360
Longfield	90	11	4	5	9	10	13	15	17	20	22	24	90
<b>Dartford</b>	<b>1,755</b>	<b>131</b>	<b>144</b>	<b>147</b>	<b>85</b>	<b>126</b>	<b>132</b>	<b>126</b>	<b>122</b>	<b>119</b>	<b>118</b>	<b>116</b>	<b>1,755</b>

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### Secondary - Year 7 Surplus/Deficit Capacity if No Further Action is Taken

Planning Group name	2023-24 capacity	2023-24 (A)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-34 (F)	2033-34 capacity
Dartford and Swanley Non-Selective	1,320	7	4	71	76	15	-36	2	-6	30	24	-16	1,440
Gravesham and Longfield Non-Selective	1,370	-42	-36	-43	-64	-113	-117	-100	-88	-119	-114	-118	1,389
Gravesham and Longfield Selective	420	-16	-23	-45	-50	-68	-70	-67	-66	-77	-75	-78	420
North West Kent Selective	720	-1	-10	-26	-45	-70	-80	-73	-68	-47	-40	-63	720

## **Primary District commentary**

Forecasts, for the Borough as a whole, indicate about 5FE surplus for the first three years of the Plan period for Year R. This surplus starts to reduce below 4FE from 2026 and continues over succeeding years. Forecasted demand comes from the Dartford East planning group and the Swanscombe and Ebbsfleet planning group.

In addition to the forecast need identified above, plans for further housing across the district will increase the need for school places. Over and above the current planned housing numbers, Dartford Borough Council have a new local plan that describes an additional 7000 units. Housing growth could be exacerbated further by an expansion of the Elizabeth Line from Abbey Wood to Ebbsfleet, which has been proposed by London Local Authorities.

### **Swanscombe and Ebbsfleet Planning Group**

This planning area is significantly impacted by the Ebbsfleet Garden City development area. A new primary school was established on the Ebbsfleet Green development in 2020-21 which opened with 1FE. The increased demand for year R places due to the pace of housebuilding has necessitated that it be expanded to its capacity of 2FE ahead of the projected timeline.

Due to much higher pupil to new housing ratios, the demand has been such in the planning group that we have decided to commission additional Year R places at Ebbsfleet Green Primary School. The school offered bulge years for 2024 and for 2025. KCC are working with the school to investigate the potential to make this a permanent expansion.

As the Garden City development progresses, a new 2FE primary provision will be provided at the Alkerden all-through school, opening with at least 1FE from September 2026.

In the longer term, should housing be delivered at expected rates, two further new primary schools (Ashmere and Ebbsfleet Central) will be required in addition to the establishment of the primary provision at Alkerden. When added to the additional FE at Ebbsfleet Green, this will provide a total of 7FE of new primary provision across the Plan period.

## **Secondary District Commentary**

There are two non-selective and two selective planning groups that cover Dartford Borough or which cross the district boundary. See appendix 13.2 for the secondary planning group maps.

### **Dartford and Swanley Non-Selective Planning Group**

There are seven schools in the Dartford and Swanley non-selective planning group: Dartford Science and Technology College, Ebbsfleet Academy, Inspiration Academy, Leigh Academy, Orchards Academy, Stone Lodge School and Wilmington Academy. All the schools are in Dartford Borough, except for Orchards Academy which is in Sevenoaks District.

Demand is manageable without any intervention for the next two years, but provision falls into deficit from 2028 by 1FE. This demand fluctuates for the remainder of the Plan period.

To manage the demand that will be derived from the additional housebuilding, the new secondary provision at the Alkerden all-through school, will be expanded to its full capacity of 8FE, as and when required. The pupil forecasts in this section only include the 4FE that will be commissioned when the school opens (in temporary accommodation, scheduled for one year) in 2025.

Also included in the forecasts, is the 2FE that KCC have commissioned at the Leigh Academy.

### **Gravesham and Longfield Non-Selective Planning Group**

There are seven schools in the Gravesham and Longfield non-selective planning group: Longfield Academy, Meopham School, Northfleet Technology College, Northfleet School for Girls, Thamesview School, Saint George's CE School and Saint John's Catholic Comprehensive School.

The planning group is in deficit for the duration of the Plan period. The deficit is 1.5FE for September 2025, but that deficit increases every year to peak at 4FE for 2028. After 2028, the deficit is forecast to be relatively steady but fluctuates between 3FE and 4FE for the remainder of the Plan period.

For 2025, KCC has recently commissioned an additional 1FE at Northfleet Technology College, which has been included in the forecasts.

By 2027, another 3FE of provision will be required. KCC will work with the schools in the planning group to see whether any would be capable of accommodating additional capacity, whilst acknowledging that any work to expand a school will be very expensive and logistically challenging. The alternative is to look at provision in adjacent planning groups, or cross boundary.

Longer term, KCC will need to consider new secondary provision depending on the publication of the Gravesham Local Plan. KCC will monitor the forecasts as the new Gravesham Local Plan becomes clear. During the local plan consultation, KCC notified GBC that there is a deficit and so any new housing needs to come with land for a new, non-selective secondary school.

### **North West Kent Selective Planning Group**

There are four schools in the North West Kent selective planning group: Wilmington Grammar School for Girls, Wilmington Grammar School for Boys, Dartford Grammar School and Dartford Grammar School for Girls.

Forecasted demand for selective places in the North West Kent Selective Planning Group indicates that the planning group will now be in deficit for the duration of the Plan period.

For 2025, the deficit is forecast to be 1FE and will likely be manageable within existing provision. The deficit then increases to 2.5FE for 2027. The deficit continues to increase to around 2.5FE every year.

All four Grammar schools have been assessed for whether an expansion is possible. The two schools in Wilmington would be very challenging to expand, due to local traffic concerns. In Dartford, the two schools are on extremely constrained ground. However, KCC is working with the boys grammar school to see whether a small expansion is possible. A project that would provide 0.5FE has been identified and feasibility work is underway.

In addition, KCC has worked with Dartford Grammar School to amend their admission criteria so that the school offers more places to students who are Kent residents. This had the effect of providing up to 40 more year 7 places to students who are Kent residents, from September 2025, without any physical changes to the buildings.

Nevertheless, there remain small pockets of Dartford where obtaining a Grammar school place is challenging due to the home to school distance being too far. KCC may only be able to ensure that the Local Authority statutory duty to provide sufficient places, of any type, is met.

As stated in previous iterations of the KCP, if additional Grammar School places are to be provided, the only feasible option is to look holistically at selective provision across the wider

North Kent area. The most efficient use of resources would be to introduce new satellite provisions, similar to those introduced in Sevenoaks. This is because current Government legislation prohibits the introduction of new selective schools.

However, options to do this would be logistically challenging. The key constraints would be identifying both boys and girls Grammar Schools willing to operate a satellite provision on a shared site, identifying land to accommodate the provisions, obtaining DfE approval and obtaining the requisite capital funding. An estimate of cost can be made by looking at the cost of a new 6FE school. This would indicate a cost of more than £35m for a 3FE boys, and a 3FE girls, Grammar satellite, plus the capital cost of obtaining at least four hectares of land. Any smaller than 3FE and the satellite becomes financially unviable for the host school to manage.

KCC will pursue every avenue to try and identify a solution that provides the selective provision required. This provision is included in the planning matrix at the end of this section, but it needs to be borne in mind that this entry is predicated on whether such a provision is actually even attainable.

### **Gravesham and Longfield Selective Planning Group**

There are two schools in the Gravesham and Longfield selective planning group: Gravesend Grammar School and the Mayfield Grammar School.

The planning group is in deficit for the whole of the planning period. For September 2025, the deficit is 1.5FE. This deficit increases to 2FE - 2.5FE for the duration of the Plan period.

Following expansions to both Mayfield Grammar School and Gravesend Grammar School, both Gravesham Grammar Schools are at their capacity and cannot be expanded further. Therefore, this demand will need to be managed across Borough boundaries or by expansion to existing schools by using satellites.

If additional Grammar School places are to be provided, the only feasible option is to look holistically at selective provision across the wider North Kent. The most efficient use of resources would be to introduce new satellite provisions, similar to those introduced in Sevenoaks. This is because current Government legislation prohibits the introduction of new selective schools.

However, options to do this would be logistically challenging. The key constraints would be identifying both boys and girls Grammar Schools willing to operate a satellite provision on a shared site, identifying land to accommodate the provisions, obtaining DfE approval and obtaining the requisite capital funding. An estimate of cost can be made by looking at the cost of a new 6FE school. This would indicate a cost of more than £35m for a 3FE boys, and a 3FE girls, Grammar satellite, plus the capital cost of obtaining at least four hectares of land. Any smaller than 3FE and the satellite becomes financially unviable for the host school to manage.

Due to the constraints around providing further selective provision, KCC will seek to ensure that there is sufficient capacity, even if that provision is non-selective.

### **Special Educational Needs**

Demand for special school places for all categories remains high. KCC needed to commission a new 250 place special school for Profound Severe and Complex Needs.

The old Birchwood Primary School site on Russell Way in Swanley has been identified as suitable, and a bid was subsequently submitted for a new Special School through KCC's Safety Valve submission. The bid for DfE funding was successful, and it is anticipated the new school will be opened by September 2027 (originally anticipated for 2026). A provider has been chosen by the DfE through open competition during this year, with the successful trust being the Leigh

Academies Trust. Given the nature of Special Schools and the distances that students travel to receive an appropriate education, the provision will be designed to cater for students in the whole North Kent area.

The new all through school at Alkerden will provide 15 primary Specialist Resource Provision places and 25 secondary places.

### Planned Commissioning - Dartford

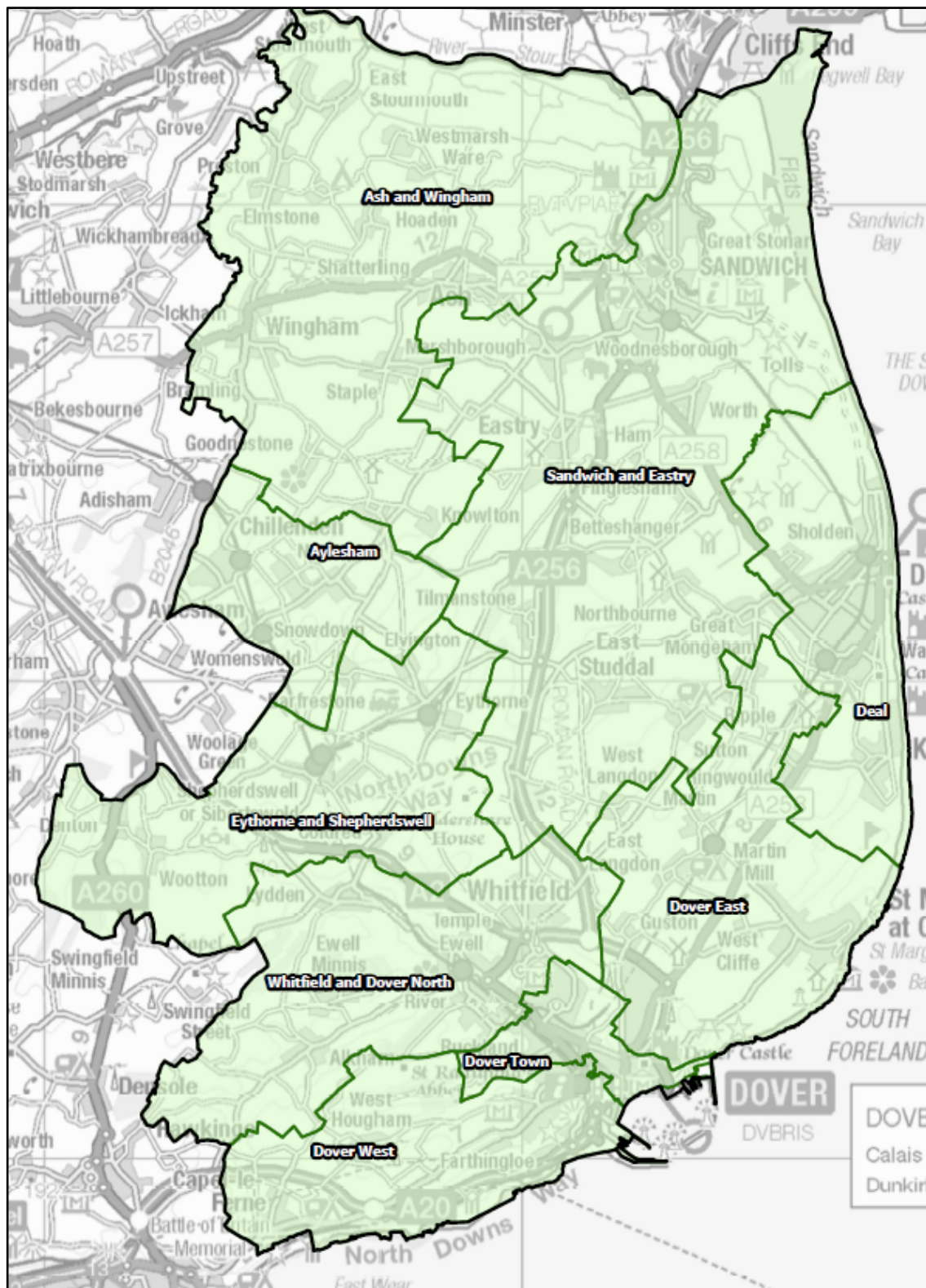
Planning Group	By 2025-26	By 2026-27	By 2027-28	By 2028-29	Between 2029-32	Post 2032
<b>Swanscombe and Ebbsfleet</b>	30 places at Ebbsfleet Green PS	1 FE new provision at Alkerden  1 FE new provision at Ebbsfleet Green PS	1FE provision at Ebbsfleet Central  1FE expansion at Alkerden	1FE provision at Ebbsfleet Central	2FE provision at Ashmere	
<b>Dartford and Swanley Non-Selective Planning Group</b>			2FE expansion at Alkerden	2FE expansion at Alkerden		
<b>Gravesham and Longfield Non-Selective</b>			3FE Permanent expansion			
<b>North West Kent Selective And Gravesham and Longfield Selective</b>				6FE selective permanent provisions		
<b>Specialist Resourced Provisions</b>		15 place primary SRP at Alkerden  25 place secondary SRP at Alkerden				
<b>Special School</b>		1 x New 250 place special school for PSCN covering all of North Kent				

## 7.4. Dover

### District commentary

- The Dover District birth rate has been on a downwards trend since a high point in 2012. The rate had a small one year rise in 2022, before continuing to fall sharply in 2023. The rate for Dover is above the National average but dipped below the Kent average in 2023. The number of births in Dover have followed a similar trend.
- We forecast sufficient primary school places across the District throughout the Plan period, although there will be some localised pressures associated with house building which may need to be addressed.
- Across the District, there will be sufficient Secondary school places throughout the Plan period. House building will mean provision will need to increase in some locations in the medium to long term.
- Dover District Council's new Local Plan for the period 2020-2040 has been submitted. We continue to work with Dover District Council Officers to consider the impact on the need for additional school places, particularly in the longer term.

Map of the Dover primary planning groups



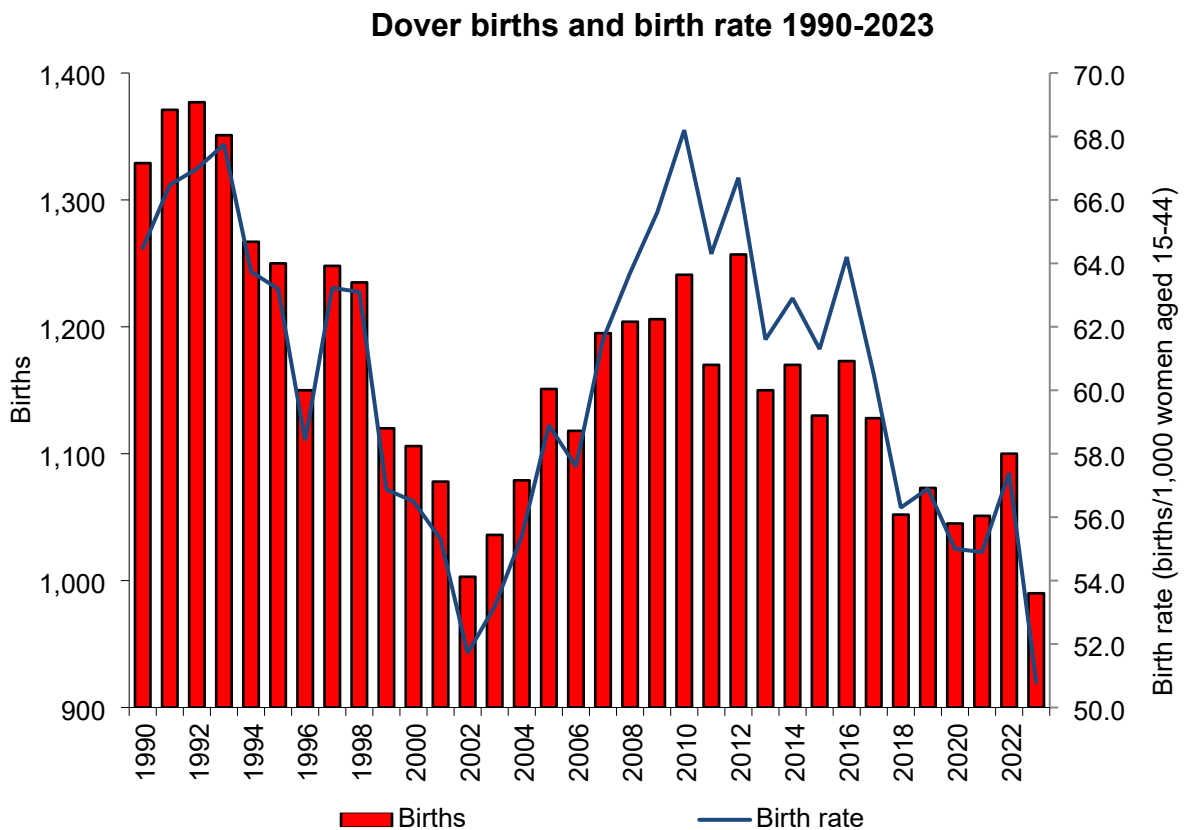
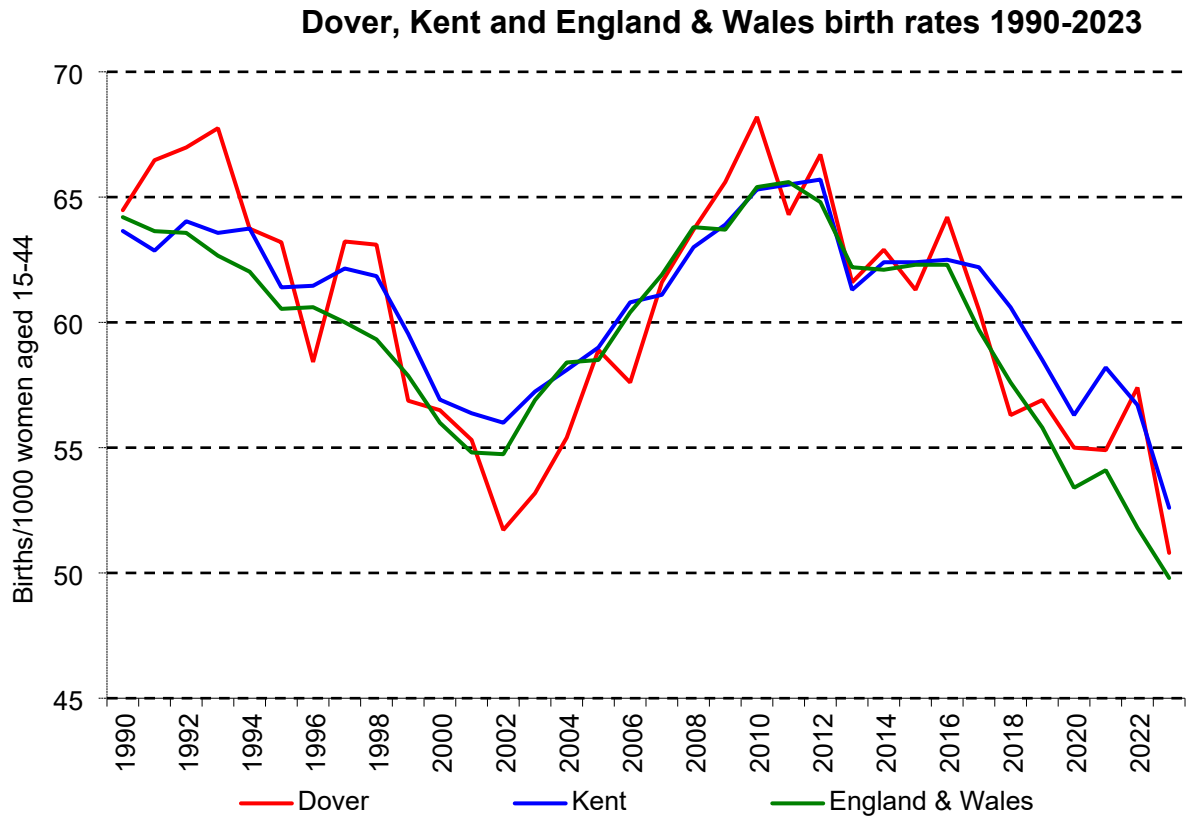


## Dover primary schools by planning group

Planning Group	School	Status
Dover Town	Barton Junior School	Academy
	Charlton CE Primary School	Academy
	Green Park Community Primary School	Community
	Shatterlocks Infant School	Academy
	St. Mary's CE Primary School (Dover)	Voluntary Aided
	St. Richard's RC Primary School	Academy
	White Cliffs Primary College for the Arts	Academy
Whitfield and Dover North	Lydden Primary School	Community
	River Primary School	Community
	Temple Ewell CE Primary School	Academy
	Whitfield Aspen School	Community
Dover West	Aycliffe Community Primary School	Community
	Capel-le-Ferne Primary School	Community
	Priory Fields School	Academy
	St. Martin's School (Dover)	Academy
	Vale View Primary School	Academy
Dover East	Guston CE Primary School	Voluntary Controlled
	Langdon Primary School	Community
	St. Margaret's-at-Cliffe Primary School	Community
Deal	Deal Parochial CE Primary School	Academy
	Downs CE Primary School	Academy
	Hornbeam Primary School	Academy
	Kingsdown and Ringwould CE Primary School	Academy
	Sandown School	Academy
	Sholden CE Primary School	Academy
	St. Mary's RC Primary School (Deal)	Academy
	Warden House Primary School	Academy
Sandwich and Eastry	Eastry CE Primary School	Voluntary Controlled
	Northbourne CE Primary School	Academy
	Sandwich Infant School	Academy
	Sandwich Junior School	Community
	Worth Primary School	Academy
Ash and Wingham	Ash Cartwright and Kelsey CE Primary School	Voluntary Aided
	Goodnestone CE Primary School	Voluntary Controlled
	Preston Primary School	Community
	Wingham Primary School	Community
Aylesham	Aylesham Primary School	Community
	Nonington CE Primary School	Voluntary Controlled
	St. Joseph's RC Primary School (Aylesham)	Academy
Eythorne and Shepherdswell	Eythorne Elvington Community Primary School	Community
	Sibertswold CE Primary School	Voluntary Controlled

## Birth rate and birth analysis

The charts below set out the birth rates for the District and the number of recorded births.



## Dover District Forecast

### Primary - Year R surplus/deficit capacity if no further action is taken

Planning Group name	2023-24 capacity	2023-24 (A)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-34 (F)	2033-34 capacity
Dover Town	270	85	50	48	46	48	47	48	48	49	50	50	240
Whitfield and Dover North	182	3	28	29	2	4	3	2	2	2	2	2	182
Dover West	170	48	46	58	52	53	53	52	52	52	51	51	170
Dover East	67	19	10	1	5	10	10	10	10	10	9	9	67
Deal	315	79	60	53	65	73	75	77	79	82	85	87	315
Sandwich and Eastry	116	25	29	31	14	19	19	19	20	21	22	23	116
Ash and Wingham	90	5	6	5	8	5	4	3	3	2	1	0	90
Aylesham	102	39	20	5	1	10	5	0	-4	-9	-13	-17	102
Eythorne and Shepherdswell	50	9	19	9	7	15	14	14	14	14	14	14	50
<b>Dover</b>	<b>1,362</b>	<b>312</b>	<b>268</b>	<b>238</b>	<b>200</b>	<b>236</b>	<b>230</b>	<b>226</b>	<b>224</b>	<b>223</b>	<b>222</b>	<b>220</b>	<b>1,332</b>

### Secondary - Year 7 surplus/deficit capacity if no further action is taken

Planning Group name	2023-24 capacity	2023-24 (A)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-34 (F)	2033-34 capacity
Dover Non-Selective	510	75	18	11	1	-15	3	26	40	51	48	25	420
Deal and Sandwich Non-Selective	435	47	27	34	33	13	16	15	56	41	37	26	425
Dover District Selective	440	-5	7	20	6	2	-2	8	31	37	29	6	440

## **Primary District Commentary**

Across the district, we forecast a significant surplus of Primary school places during the Plan period. In the short to medium term, we will collaborate with schools to manage the high levels of surplus Primary school places to help maintain high quality, sustainable provision.

### **Whitfield and Dover North Planning Group**

We forecast a small surplus of Year R places from 2026/27 through to the end of the Plan period.

Much of this planning group comprises the area designated as the Whitfield Urban Expansion (WUE). The WUE has outlined planning consent for 5,750 new homes to be delivered over the next 20 years. To provide sufficient primary school places, the provision of three 2FE Primary schools were included within the Master Plan. The expansion of Whitfield Aspen, on to a satellite site at Richmond Way, currently provides for 1FE of additional mainstream provision. Plans are in place to add an additional block of classrooms to enable expansion to 2FE, when required, to meet local demand.

It has been around 13 years since the WUE masterplan was adopted. In that time, the DfE has reviewed the pupil yield data which suggests that a higher number of primary aged pupils will come from new housing in Dover than KCC previously expected. Additionally, we have been informed that a further 600 dwellings could be added to the Masterplan. If that is the case, additional primary school places would be required.

### **Dover East Planning Group**

Surplus Year R places are forecast throughout the Plan period. If school places are required to support consented development, this will be via the expansion of Guston Church of England Primary School to 1FE.

### **Sandwich and Eastry Planning Group**

Surplus Year R places are forecast throughout the Plan period. However, consented and allocated developments in Sandwich, and the neighbouring villages of Eastry and Ash, account for over 1,000 new homes. Should housing come forward as identified in the Local Plan, up to 1FE of provision in Sandwich may be required.

### **Ash and Wingham Planning Group**

Current forecasts are showing a surplus of Year R places which reduces across the Plan period. Developer contributions have been agreed, which will support the expansion of primary school places should this be required.

### **Aylesham Planning Group**

The deficit of Year R places forecast in the previous two iterations of this plan was due to an influx of young families moving into Aylesham, which led to an expected high forecast demand for primary school places. The demand did not materialise. The demand for Year R places in the latest forecasts suggests 0.5FE of places will be required at the end of the Plan period.

Developer contributions are secured to support the expansion of provision in the planning group as and when required. We will continue to monitor pupil numbers closely and collaborate with the schools in the planning group to ensure that sufficient primary school provision is available, as required.

## Secondary District Commentary

There are three secondary planning groups within Dover District (See appendix 13.2 for the non-selective and selective planning group maps). Two planning groups are non-selective (Dover, Deal and Sandwich) and one selective. The commentary below outlines the forecast position for each of the planning groups.

### Dover Non-Selective Planning Group

There are three Schools in the Dover non-selective planning group: Astor College of the Arts, Dover Christ Church Academy and St. Edmunds RC School. The Whitfield Urban Expansion will, over time, increase the pressure on local secondary schools. When additional places are required, it is expected this will be via the expansion of Dover Christ Church Academy as the local school. The small deficit of Year 7 places forecast for the 2027/28 academic year will be managed within existing schools.

### Deal and Sandwich Non-Selective Planning Group

There are two Schools in the Deal and Sandwich non-selective planning group: Goodwin Academy and Sandwich Technology School. Forecasts suggest sufficient Year 7 places throughout the Plan period. Consented and proposed developments in Sandwich, and the neighbouring villages of Eastry and Ash, account for over 1,000 new homes. Additional land is being secured through the local plan process to support additional secondary school places at Sandwich Technical College as and when required.

### Dover Selective Planning Group

Three schools provide selective provision: Dover Boys Grammar, Dover Girls Grammar and Sir Roger Manwood's Grammar. There is forecast to be sufficient places in this sector through out the forecast period, with the exception of the 2028-29 academic year (-2 places). Any significant increase in house building will change this situation.

### Planned Commissioning - Dover

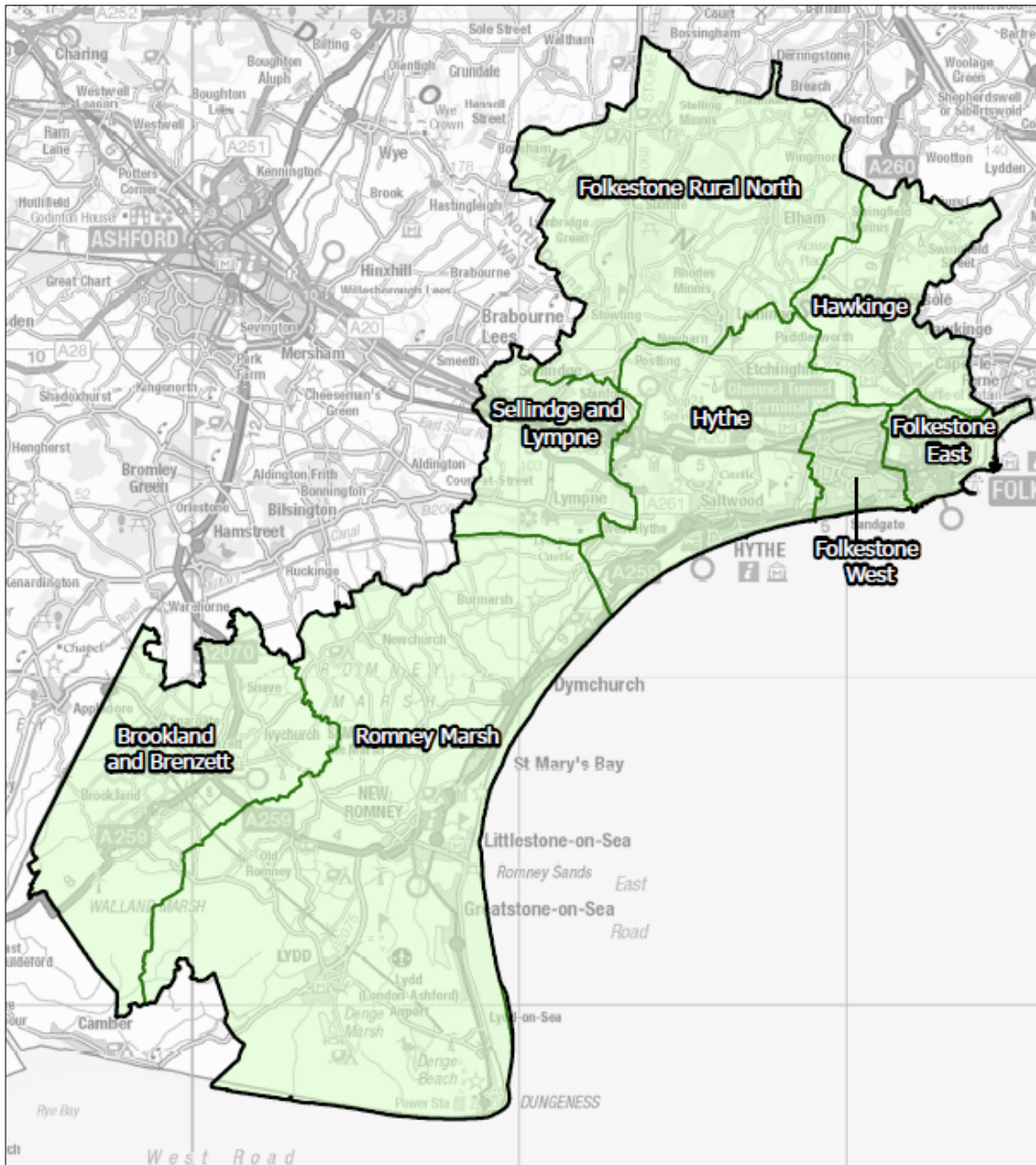
Planning Group	By 2025-26	By 2026-27	By 2027-28	By 2028-29	Between 2029-32	Post 2032
Whitfield and North Dover					Expansion of Whitfield Aspen by 1FE	New 2FE primary school in Whitfield
Dover East					0.3FE expansion of Guston CE Primary School	
Aylesham					up to 0.5FE expansion of existing provision	
Sandwich and Eastry						1FE Sandwich planning group
Dover Non-selective						2FE at Dover Christ Church academy

## 7.5. Folkestone and Hythe

### District commentary

- The birth rate in Folkestone and Hythe continued to fall in 2023 and it dropped below the County average but is comparable to the National rate. The number of recorded births has also fallen, with just 898 births recorded in 2023.
- We forecast around 23% of primary school places will be surplus across the District throughout the Plan period.
- Within the secondary sector, we forecast a small deficit of non-selective secondary school places in both Folkestone and Hythe and Romney Marsh at different points.
- The adopted Core Strategy (2022) sets out a long-term vision for the District from 2019/20 to 2036/37. The indicative housing trajectory in the Core Strategy suggests that 13,407 new dwellings could be delivered in the period 2019/20 to 2036/37, with Otterpool Park accounting for 5,593 of these dwellings. This would be an average of 745 per annum. During the period 2013/14 to 2022/23, an average of 390 homes were completed per annum (Kent Analytics Statistical Bulletin April 2024).
- Plans for the Garden Village at Otterpool Park continue to progress. The level of development would require significant educational infrastructure across not only primary and secondary phases, but also Early Years and specialist provision. We continue to work with the District Council and the promoter of the site to identify how and when new provision will be required.

## Map of the Folkestone and Hythe primary planning groups



## Folkestone and Hythe primary schools by planning group

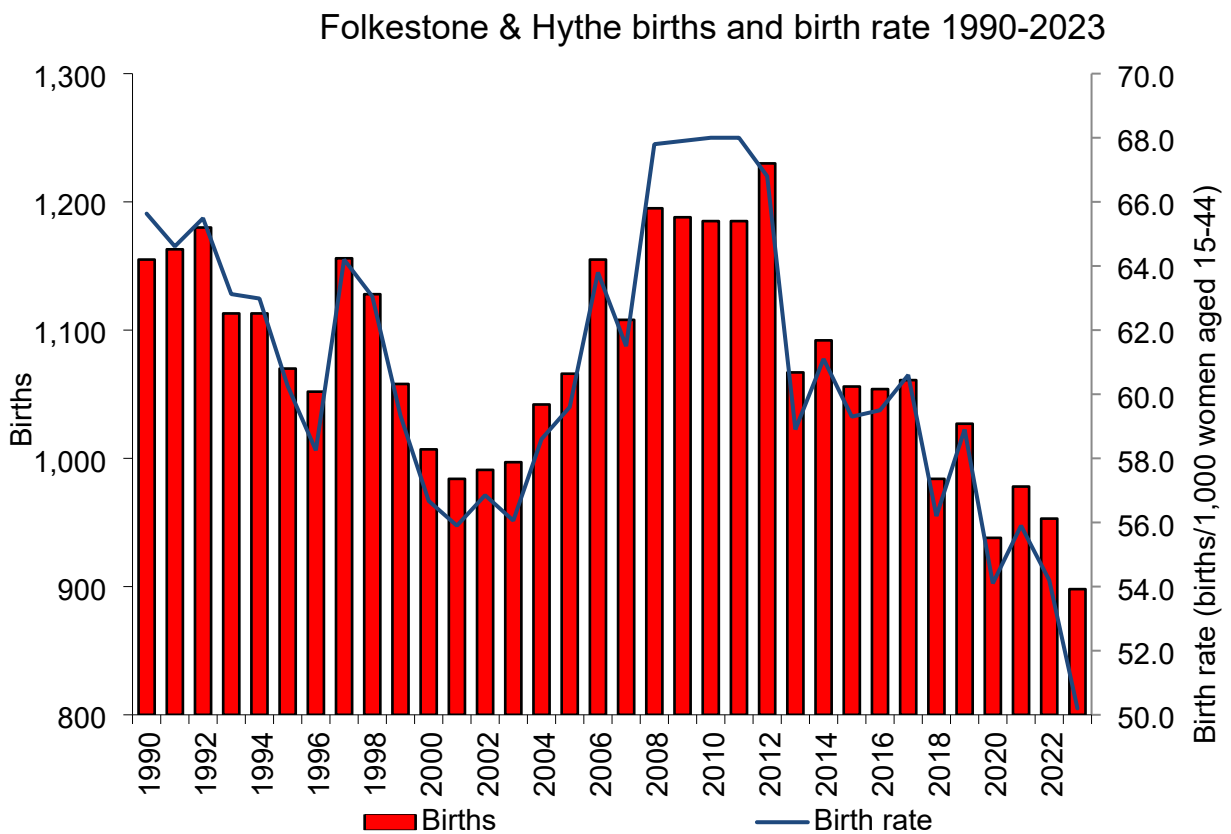
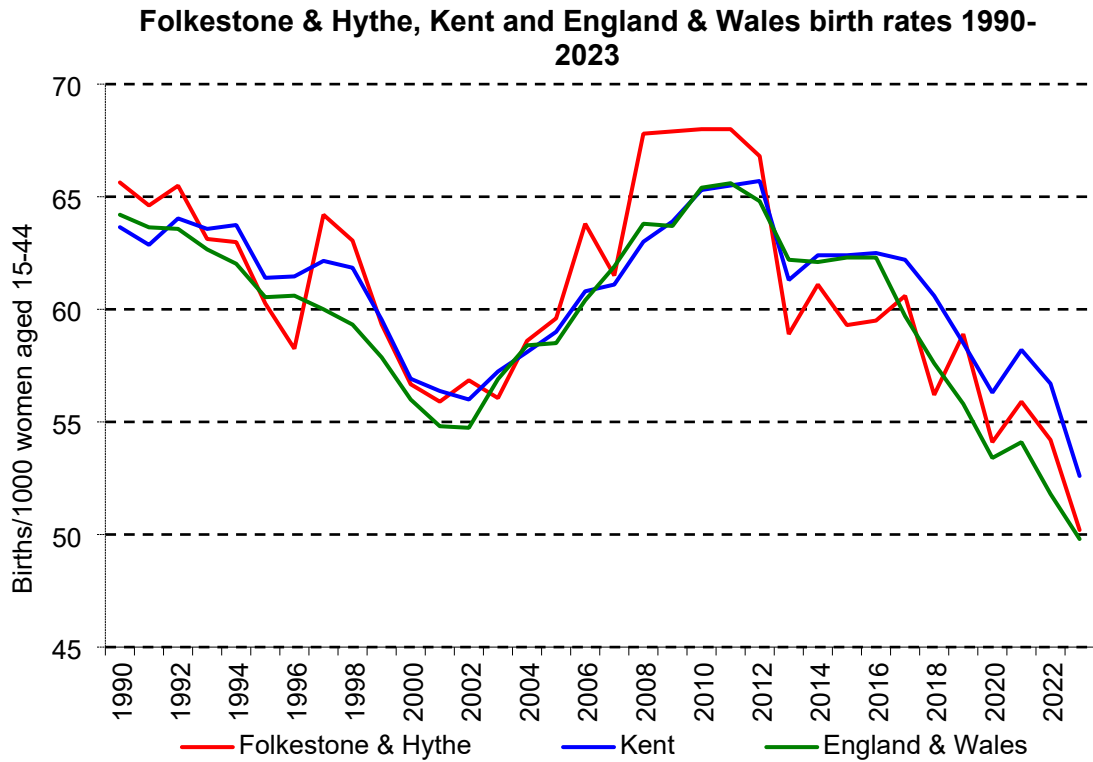
Planning Groups	School	Status
Folkestone East	Castle Hill Community Primary School	Community
	Christ Church CE Academy	Academy
	Folkestone Primary Academy	Academy
	Martello Primary School	Academy
	Mundella Primary School	Academy
	St. Eanswythe's CE Primary School	Academy
	St. Mary's CE Primary Academy (Folkestone)	Academy
	St. Peter's CE Primary School (Folkestone)	Voluntary Controlled
Folkestone West	Stella Maris RC Primary School	Academy
	All Souls' CE Primary School	Academy
	Cheriton Primary School	Foundation
	Harcourt Primary School	Foundation
	Morehall Primary School	Academy
	Sandgate Primary School	Community

Planning Groups	School	Status
	St. Martin's CE Primary School (Folkestone)	Voluntary Controlled
Hawkinge	Churchill School (Hawkinge)	Foundation
	Hawkinge Primary School	Foundation
	Selsted CE Primary School	Voluntary Controlled
Folkestone Rural North	Bodsham CE Primary School	Voluntary Controlled
	Elham CE Primary School	Voluntary Aided
	Lyminge CE Primary School	Voluntary Controlled
	Stelling Minnis CE Primary School	Voluntary Controlled
	Stowting CE Primary School	Voluntary Controlled
Hythe	Hythe Bay CE Primary School	Voluntary Controlled
	Palmarsh Primary School	Community
	Saltwood CE Primary School	Voluntary Aided
	Seabrook CE Primary School	Voluntary Controlled
	St. Augustine's RC Primary School (Hythe)	Academy
Sellindge and Lympe	Lympe CE Primary School	Voluntary Controlled
	Sellindge Primary School	Community
Romney Marsh	Dymchurch Primary School	Academy
	Greatstone Primary School	Foundation
	Lydd Primary School	Academy
	St. Nicholas CE Primary Academy	Academy
Brookland and Brenzett	Brenzett CE Primary School	Academy
	Brookland CE Primary School	Voluntary Controlled



## Birth rate and birth analysis

The charts below set out the birth rates for the District and the number of recorded births.



## Folkestone and Hythe Analysis

### Primary - Year R surplus/deficit capacity if no further action is taken

Planning Group name	2023-24 capacity	2023-24 (A)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-34 (F)	2033-34 capacity
Folkestone East	373	55	73	77	93	99	101	102	104	105	106	106	373
Folkestone West	255	20	23	27	8	24	22	20	18	16	15	13	255
Hawkinge	135	23	32	18	27	29	29	29	29	28	28	28	135
Folkestone Rural North	93	33	26	25	13	19	19	20	20	21	22	22	93
Hythe	150	17	53	47	37	56	56	55	55	55	55	55	150
Sellindge and Lymgne	60	3	8	2	-5	-5	-5	-5	-5	-5	-5	-5	60
Romney Marsh	187	48	55	36	49	60	61	62	63	64	65	66	165
Brookland and Brenzett	35	9	9	10	9	11	11	12	12	12	12	13	35
<b>Folkestone &amp; Hythe</b>	<b>1,288</b>	<b>208</b>	<b>278</b>	<b>242</b>	<b>230</b>	<b>291</b>	<b>293</b>	<b>295</b>	<b>295</b>	<b>297</b>	<b>297</b>	<b>297</b>	<b>1,266</b>

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### Secondary - Year 7 Surplus/Deficit Capacity if No Further Action is Taken

Planning Group name	2023-24 capacity	2023-24 (A)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-34 (F)	2033-34 capacity
Folkestone and Hythe Non-Selective	625	17	-30	-12	-4	-35	-24	12	-2	59	41	17	595
Romney Marsh Non-Selective	180	-14	-10	-8	13	9	-8	7	9	19	21	28	180
Folkestone & Hythe District Selective	360	-3	27	25	22	26	23	25	23	22	23	27	330

## Primary District Commentary

### **Folkestone and Hythe District Analysis - Primary**

Across the District, we forecast a significant surplus of primary school places during the Plan period. In the short to medium term, we will collaborate with schools to manage the high levels of surplus primary school places to help maintain high quality, sustainable provision.

### **Folkestone West Planning Group**

Forecasts suggest sufficient Year R capacity throughout the Plan period. Land and developer contributions are available for a new 2FE primary school at Shorncliffe Heights, however, it is unlikely this will be required in this decade.

### **Sellindge and Lympne Planning Group**

Current forecasts are showing a small deficit of Year R places from 2026-27 onwards. Further development is expected in the village which will need to be mitigated. Developer contributed land and funding has been agreed, which will enable Sellindge Primary School to expand as and when required.

## Secondary District Commentary

### **Folkestone and Hythe Non-Selective Planning Group**

There are three schools in the Folkestone and Hythe non-selective planning group: Brockhill Park Performing Arts College, Folkestone Academy and The Turner Free School. Forecasts suggest there will be a small deficit of non-selective Year 7 early in the Plan period. We will work with existing academy trusts to ensure sufficient Year 7 places.

### **Romney Marsh Non-Selective Planning Group**

There is one non-selective school in the planning group: The Marsh Academy.

Forecasts suggest there could be a small deficit of Year 7 places in some years across the Plan period. The Academy's Admissions Policy identifies a 'priority zone' for the admission of pupils who reside in towns and villages surrounding Romney Marsh. Therefore, we anticipate there will be sufficient places for local pupils to be admitted, whilst those travelling from further afield will be eased back into more local schools.

### **Folkestone and Hythe Selective Planning Group**

There are two selective schools in the District: Folkestone Girls Grammar and Harvey Grammar. Forecasts suggest there will be sufficient Year 7 places available throughout the Plan period.

## **Planned Commissioning – Folkestone and Hythe**

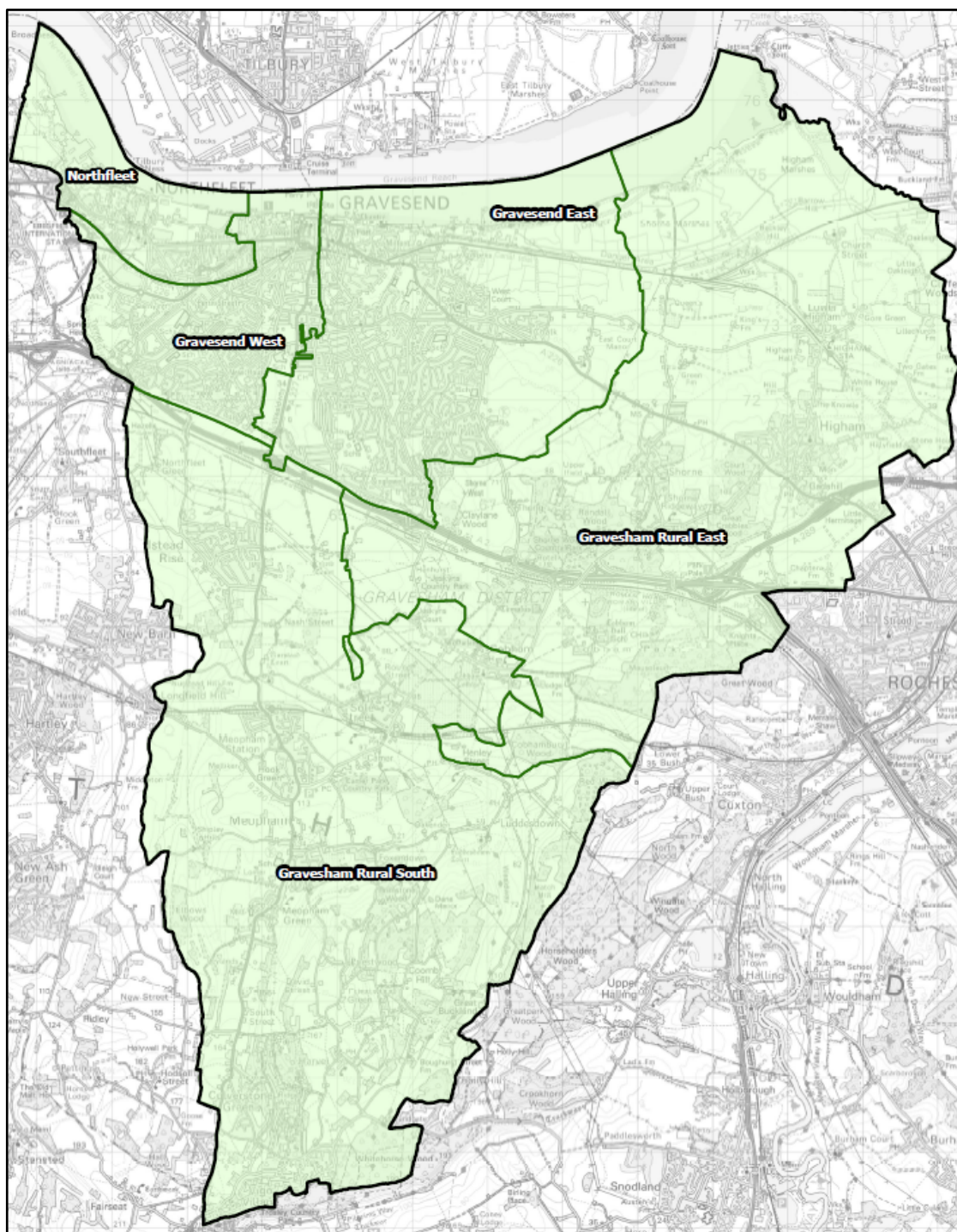
<b>Planning Group</b>	<b>By 2025-26</b>	<b>By 2026-27</b>	<b>By 2027-28</b>	<b>By 2028-29</b>	<b>Between 2029-32</b>	<b>Post 2032</b>
<b>Folkestone West Primary</b>						2FE new provision in Shorncliffe

## 7.6. Gravesham

### Borough Summary

- The Gravesham birth rate and number of births have fallen sharply since 2019, but remain above the county and national figures. Following a small increase in 2022, the rate dropped again in 2023.
- Forecasts indicate that there are surplus Year R places across the Primary planning groups. KCC is working with schools in the areas, with the larger surpluses, to see whether there is any need to reduce their PAN in order to remain viable.
- Small pockets of primary deficits are forecast in more rural parts of Gravesham, but these will be covered by adjacent planning groups.
- The Gravesham and Longfield Non-Selective planning group shows 1.5FE deficit from the outset. The deficit increases year on year, peaking at nearly 4FE for September 2028. The deficit remains high for the remainder of the Plan period, ranging from 3FE to 4FE. It then remains at that level of deficit for the duration of the Plan period. Every non-selective secondary school in Gravesham has either expanded or is the subject of an ongoing expansion project.
- The Gravesham and Longfield Selective Planning Group forecast shows a deficit of about 2.5FE for September 2028. Any options for creating additional selective capacity will be extremely challenging and KCC may be only able to ensure that the Local Authority statutory duty to provide sufficient places, of any type, is met..
- The current Gravesham Borough Council (GBC) Local Plan, adopted in September 2014, states an intention to build 6,170 dwellings between 2011 to 2028. A new Local Plan is expected to be published in the near future and KCC will work with GBC to ensure that sufficient school places are available. It is already clear that any options for further expansion of existing secondary schools will be both extremely limited and logistically challenging, so new school sites will have to be provided to ensure the sufficiency of Secondary School places over the longer term.
- Prior to the Covid pandemic, a significant factor to primary and secondary demand in Gravesham Borough, was the migration from urban centres in Greater London to locations such as Gravesham Borough. Migration reduced significantly over the last four years, but it is not unreasonable to suggest that migration will pick up. We are already seeing this in the Junior aged cohort, as families move into the area to place themselves in a more favourable position of gaining a place for their child in the Secondary School of their choice.

## Gravesham Primary Schools by Planning Group



Planning Group	School	Status
Gravesend East	Chantry Community Academy	Academy
	Holy Trinity CE Primary School (Gravesend)	Academy
	Kings Farm Primary School	Community
	Riverview Infant School	Academy
	Riverview Junior School	Academy
	Singlewell Primary School	Community
	St. John's RC Primary School (Gravesend)	Academy
	Tymberwood Academy	Academy
Westcourt Primary School	Academy	

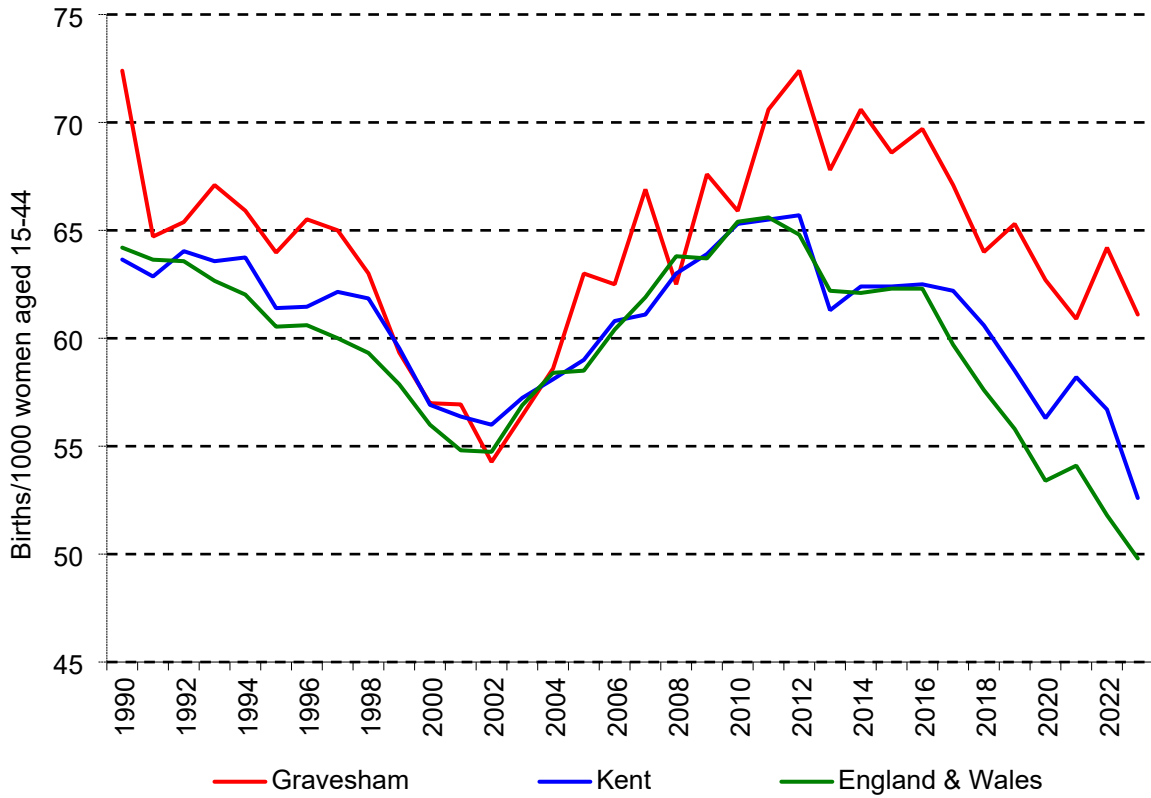
Planning Group	School	Status
	Whitehill Primary School	Academy
Gravesend West	Cecil Road Primary School	Community
	Copperfield Academy	Academy
	Painters Ash Primary School	Community
	Saint George's CE Primary School (Gravesend)	Academy
	Shears Green Infant School	Academy
	Shears Green Junior School	Community
	Springhead Park Primary School	Free
	Wrotham Road Primary School	Academy
Northfleet	Lawn Primary School	Community
	Rosherville CE Primary Academy	Academy
	St. Botolph's CE Primary School (Gravesend)	Academy
	St. Joseph's RC Primary School (Northfleet)	Academy
Gravesham Rural East	Higham Primary School	Community
	Shorne CE Primary School	Academy
Gravesham Rural South	Cobham Primary School	Community
	Culverstone Green Primary School	Academy
	Istead Rise Primary School	Academy
	Meopham Community Academy	Academy
	Vigo Village School	Community



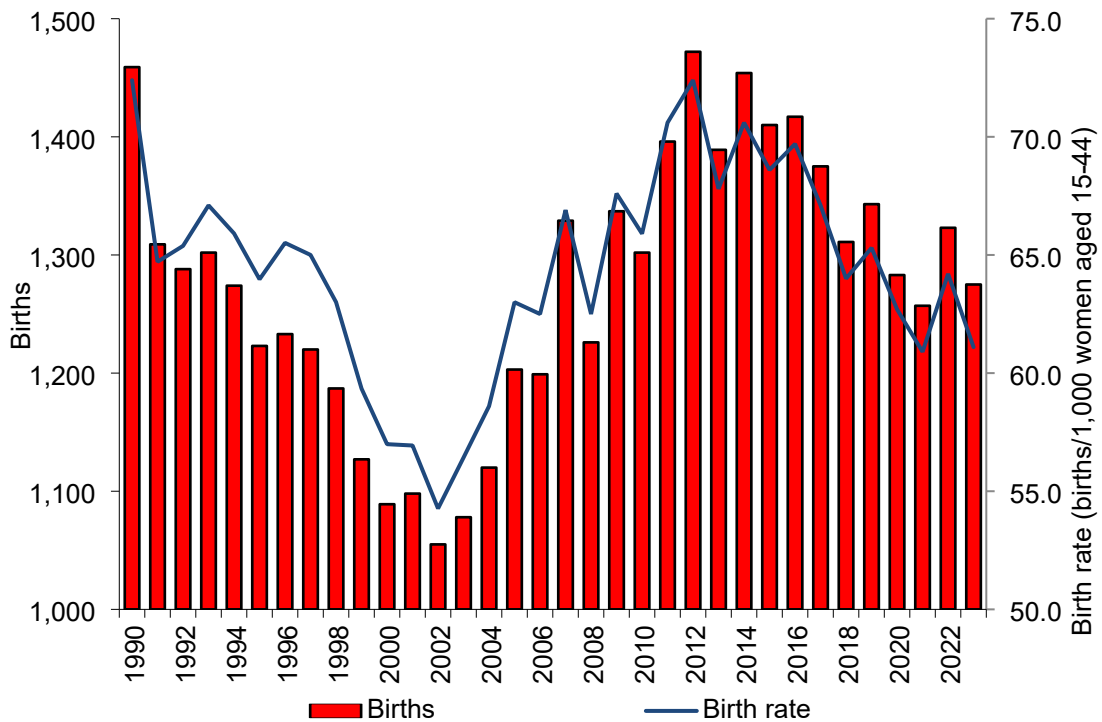
## Birth Rate and Birth Analysis

The charts below set out the birth rates for the Borough and the number of recorded births.

### Gravesham, Kent and England & Wales birth rates 1990-2023



### Gravesham births and birth rate 1990-2023



## Gravesham Forecasts

### Primary - Year R Surplus/Deficit Capacity if No Further Action is Taken

Planning Group name	2023-24 capacity	2023-24 (A)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-34 (F)	2033-34 capacity
Gravesend East	682	92	61	56	37	51	54	57	60	61	63	63	622
Gravesend West	474	53	54	17	22	19	18	20	22	24	25	26	444
Northfleet	140	2	0	42	32	38	39	40	40	41	41	41	180
Gravesham Rural East	60	2	3	1	10	9	9	9	9	8	8	8	60
Gravesham Rural South	180	27	-1	3	-12	3	5	7	9	11	14	16	180
<b>Gravesham</b>	<b>1,536</b>	<b>176</b>	<b>117</b>	<b>118</b>	<b>88</b>	<b>119</b>	<b>124</b>	<b>132</b>	<b>140</b>	<b>145</b>	<b>151</b>	<b>154</b>	<b>1,486</b>

### Secondary - Year 7 Surplus/Deficit Capacity if No Further Action is Taken

Planning Group name	2023-24 capacity	2023-24 (A)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-34 (F)	2033-34 capacity
Gravesham and Longfield Non-Selective	1,370	-42	-36	-43	-64	-113	-117	-100	-88	-119	-114	-118	1,389
Gravesham and Longfield Selective	420	-16	-23	-45	-50	-68	-70	-67	-66	-77	-75	-78	420



## **Primary District commentary**

Recent forecasts have indicated a stabilisation of demand that leaves a surplus of Year R capacity across the Borough for the duration of the Plan period. However, locally, Gravesham Rural South planning group indicates small deficits from September 2023.

Gravesham is expected to publish a new Local Plan in the coming months. The Reg 18 consultation has been completed. Ahead of any new plan being published, new housing development on the Northfleet Embankment and Gravesend Canal Basin will see demand for Primary School places increase in the medium term.

The new housing on the Canal Basin is expected to comprise a mix of types, with the majority being one, two and three bedroom flats. Traditionally, the number of school age children generated from such housing types is lower than for houses, but the shortage of housing may now result in more families living in smaller dwellings. KCC will work with GBC to ensure that we remain cognisant of the numbers of housing types and plan accordingly.

The largest surplus is in the Gravesham East primary planning group. There is additional capacity ready to be re-introduced, following some schools in the area taking the decision to reduce their PAN in response to low year R intakes in recent years. However, if a significant number of new dwellings are more suitable for families, then we may need to seek land for a new primary school for the longer term.

To support the growth in the Northfleet Embankment area, KCC has commissioned additional provision by relocating and enlarging Rosherville Church of England Academy onto a new site at Cable Wharf.

New housing in the Coldharbour area will generate some additional need for Year R places. This will be accommodated within the recently opened second FE of primary provision at Saint George's CE School and the Shears Green Infant and Shears Green Junior schools.

### **Northfleet Planning Group**

The planning group indicates a small surplus every year, but this does not reflect the new pupils generated by the three new developments on the Northfleet Embankment (Cable Wharf, Grove Road and Harbour Village). This will largely be managed by using the expanded and relocated Rosherville CE Primary School and utilising capacity in adjacent planning groups that show a surplus, such as Gravesend West.

### **Gravesham Rural South Planning Group**

The planning group indicates a small deficit for the next three years. The deficits will largely be managed by using capacity in adjacent planning groups that show a surplus, such as Gravesend East.

### **Gravesend West**

Although there is surplus in the Gravesend West planning group, there is development being planned by the Ebbsfleet Development Corporation (EDC) on a site that straddles the Dartford and Gravesham border. Without additional capacity being introduced, some of the surplus capacity will be utilised. A new primary school is being proposed by the EDC, which will serve the new development on both sides of the Borough border.

## **Secondary District Commentary**

There is one selective and one non-selective planning group that cover the Gravesham area.

See appendix 13.2 for the secondary planning group maps.

### **Gravesham and Longfield Non-Selective Planning Group**

There are seven schools in the Gravesham and Longfield non-selective planning group: Longfield Academy, Meopham School, Northfleet Technology College, Northfleet School for Girls, Thamesview School, Saint George's CE School and St John's Catholic Comprehensive School.

The planning group is in deficit for the duration of the Plan period. The deficit is 1.5FE for September 2025, but that deficit increases every year to peak at 4FE for 2028. After 2028, the deficit is forecast to be relatively steady but fluctuates between 3FE and 4FE for the remainder of the Plan period.

For 2025, KCC has recently commissioned an additional 1FE at Northfleet Technology College, which has been included in the forecasts.

By 2027, another 3FE of provision will be required. KCC will work with the schools in the planning group to see whether any would be capable of accommodating additional capacity, whilst acknowledging that any work to expand a school will be expensive and logistically challenging. The alternative is to look at provision in adjacent planning groups, or cross boundary.

Longer term, KCC will need to consider new secondary provision, depending on the publication of the Gravesham Local Plan. KCC will monitor the forecasts as the new Gravesham Local Plan becomes clear. During the local plan consultation, KCC notified GBC that there is deficit, and so any new housing needs to come with land for a new, non-selective secondary school.

### **Gravesham and Longfield Selective Planning Group**

There are two schools in the Gravesham and Longfield selective planning group: Gravesend Grammar School and the Mayfield Grammar School.

The planning group is in deficit for the whole of the Plan period. For September 2025, the deficit is 1.5FE. This deficit increases to 2FE - 2.5FE for the duration of the Plan period.

Following expansions to both Mayfield Grammar School and Gravesend Grammar School, both Gravesham Grammar Schools are at capacity and cannot be expanded further. Therefore, this demand will need to be managed across Borough boundaries, or by expansion to existing schools by using satellites.

If additional Grammar School places are to be provided, the only feasible option is to look holistically at selective provision across the wider North Kent area. The most efficient use of resources would be to introduce new satellite provisions, similar to those introduced in Sevenoaks. This is because current Government legislation prohibits the introduction of new selective schools.

However, options to do this would be logistically challenging. The key constraints would be identifying both boys and girls Grammar Schools willing to operate a satellite provision on a shared site, identifying land to accommodate the provisions, obtaining DfE approval and obtaining the requisite capital funding. An estimate of cost can be made by looking at the cost of a new 6FE school. This would indicate a cost of more than £35m for a 3FE boys, and a 3FE girls, Grammar satellite, plus the capital cost of obtaining at least four hectares of land. Any smaller than 3FE and the satellite becomes financially unviable for the host school to manage.

Due to the constraints around providing further selective provision, KCC will seek to ensure that there is sufficient capacity, even if that provision is non-selective.

KCC will pursue every avenue to try and identify a solution that provides the selective provision required. This provision is included in the planning matrix at the end of this section, but it needs to be borne in mind that this entry is predicated on whether such a provision is actually even attainable.

### Special Educational Needs

Demand for special school places, for all categories, remains high. KCC needed to commission a new 250 place special school for Profound Severe and Complex Needs.

The old Birchwood Primary School site on Russell Way in Swanley has been identified as suitable, and a bid was subsequently submitted for a new Special School through KCC's Safety Valve submission. The bid for DfE funding was successful, and it is anticipated the new school will be opened by September 2027 (originally anticipated for 2026). A provider has been chosen by the DfE, through open competition during this year, with the successful trust being the Leigh Academies Trust. Given the nature of Special Schools, and the distances that students travel to receive an appropriate education, the provision will be designed to cater for students in the whole North Kent area.

### Planned Commissioning – Gravesham

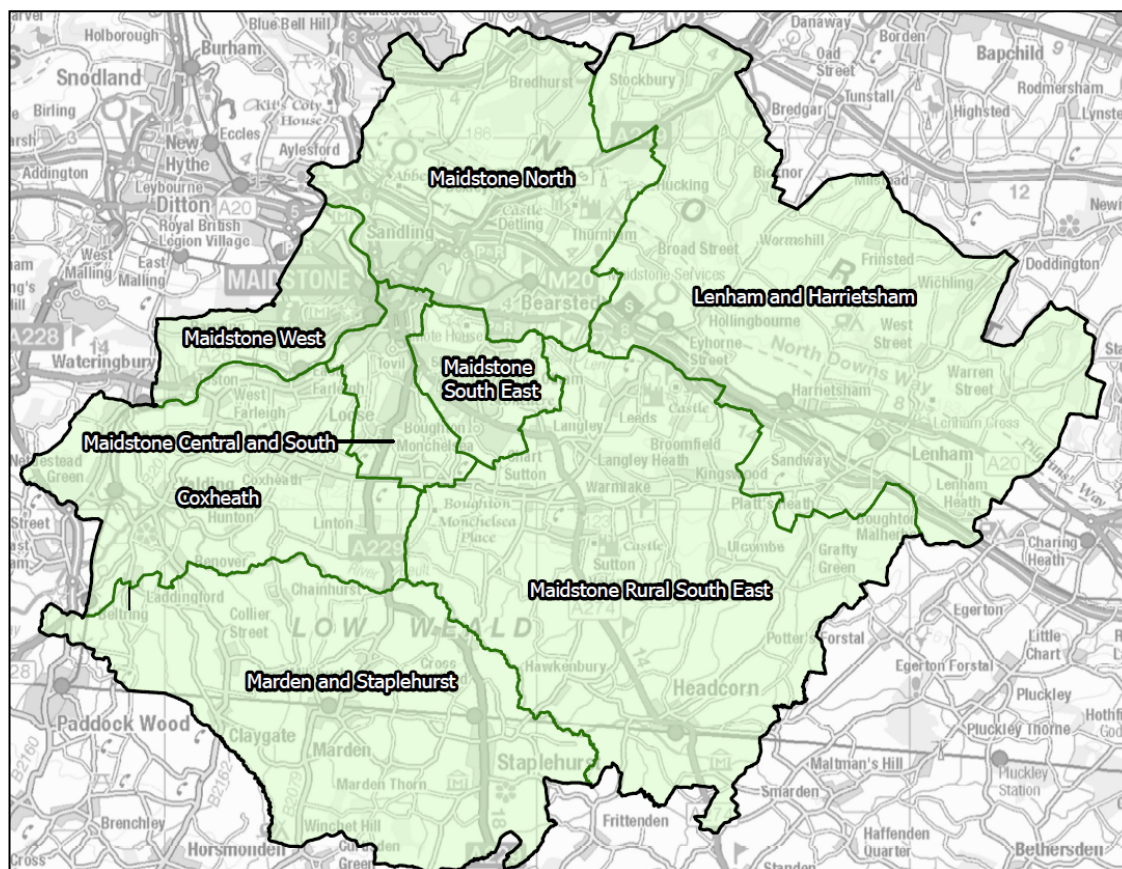
Planning Group	By 2025-26	By 2026-27	By 2027-28	By 2028-29	Between 2029-32	Post 2032
Northfleet	0.3FE (10 additional permanent places) at Rosherville CE Academy			1FE at Rosherville CE Academy		
Gravesham and Longfield Non-Selective			3FE Permanent expansion			
North West Kent Selective And Gravesham and Longfield Selective				6FE selective permanent provision		
Special Education Needs		1 x New 250 place special school for PSCN covering all of North Kent				

## 7.7. Maidstone

### Borough commentary

- The birth rate in Maidstone dropped sharply in 2019 and 2020, but then increased significantly in 2021, before dropping back again in 2022 and 2023. However, it remains above the county and national averages.
- We forecast sufficient primary school places across the Borough throughout the Plan period. However, there is pressure for places forecast within some planning groups. Within the secondary sector, we forecast a pressure for places in both the non-selective and selective sectors.
- Maidstone Borough Council's Local Plan was formally adopted in October 2017, setting out the scale and location of proposed development up to 2031. This plan was reviewed and in 2024 the Borough Council adopted the Local Plan Review, which plans for the delivery of 1,157 per annum until 2038.

## Map of the Maidstone Primary Planning Groups



## Maidstone Primary Schools by Planning Group

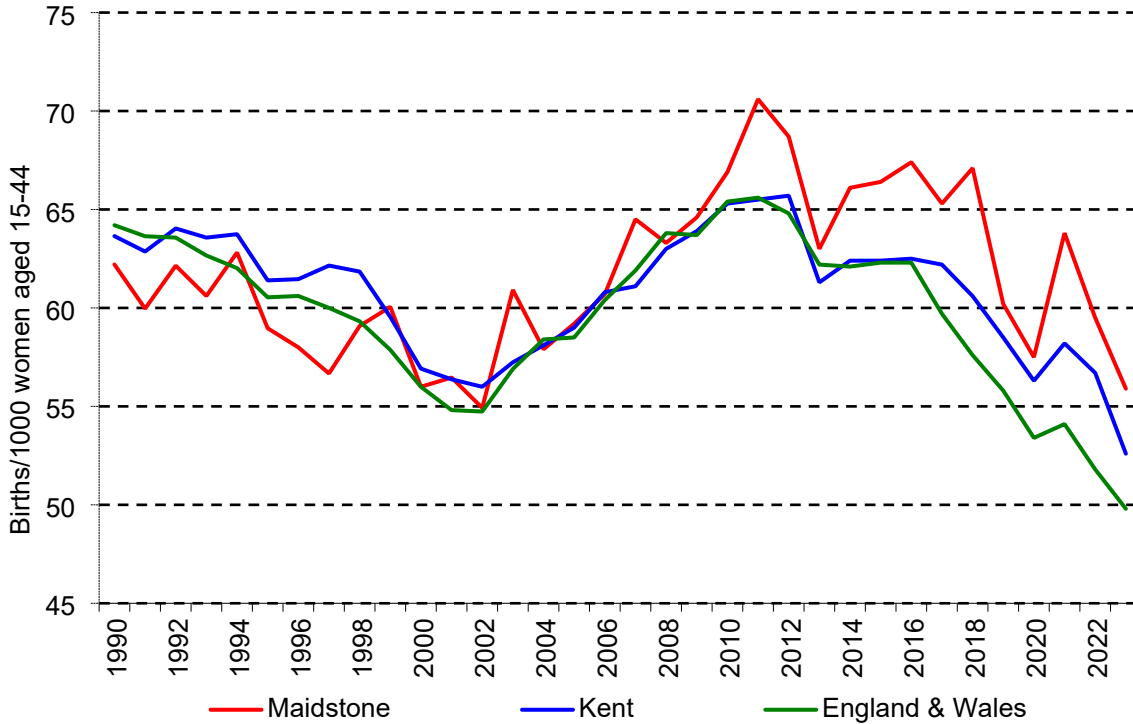
Planning Groups	School	Status
Maidstone Central and South	Archbishop Courtenay CE Primary School	Academy
	Boughton Monchelsea Primary School	Community
	Loose Primary School	Community
	South Borough Primary School	Academy
	Tiger Primary School	Free
Maidstone North	Bearsted Primary Academy	Free
	Bredhurst CE Primary School	Voluntary Controlled
	Madginford Primary School	Community
	North Borough Junior School	Community
	Roseacre Junior School	Foundation
	Sandling Primary School	Community
	St. John's CE Primary School (Maidstone)	Academy
	St. Paul's Infant School	Community
	Thurnham CE Infant School	Voluntary Controlled
Valley Invicta Primary School at East Borough	Academy	
Maidstone West	Allington Primary School	Academy
	Barming Primary School	Academy
	Brunswick House Primary School	Community
	Jubilee Primary School	Free
	Palace Wood Primary School	Community
	St. Francis' RC School	Voluntary Aided
	St. Michael's CE Infant School	Voluntary Controlled
	St. Michael's CE Junior School	Voluntary Controlled

Planning Groups	School	Status
	West Borough Primary School	Community
Maidstone South East	Greenfields Community Primary School	Community
	Holy Family RC Primary School	Academy
	Langley Park Primary Academy	Academy
	Molehill Primary Academy	Academy
	Oaks Primary Academy	Academy
	Park Way Primary School	Community
	Senacre Wood Primary School	Community
	Tree Tops Primary Academy	Academy
Lenham and Harrietsham	Harrietsham CE Primary School	Voluntary Controlled
	Hollingbourne Primary School	Community
	Lenham Primary School	Community
	Platts Heath Primary School	Community
Coxheath	Coxheath Primary School	Community
	East Farleigh Primary School	Community
	Hunton CE Primary School	Voluntary Aided
	Yalding St. Peter and St. Paul CE Primary School	Voluntary Controlled
Marden and Staplehurst	Laddingford St. Mary's CE Primary School	Voluntary Controlled
	Marden Primary Academy	Academy
	St. Margaret's Collier Street CE Primary School	Voluntary Controlled
	Staplehurst School	Community
Maidstone Rural South East	Headcorn Primary School	Community
	Kingswood Primary School	Community
	Leeds and Broomfield CE Primary School	Voluntary Controlled
	Sutton Valence Primary School	Community
	Ulcombe CE Primary School	Voluntary Controlled

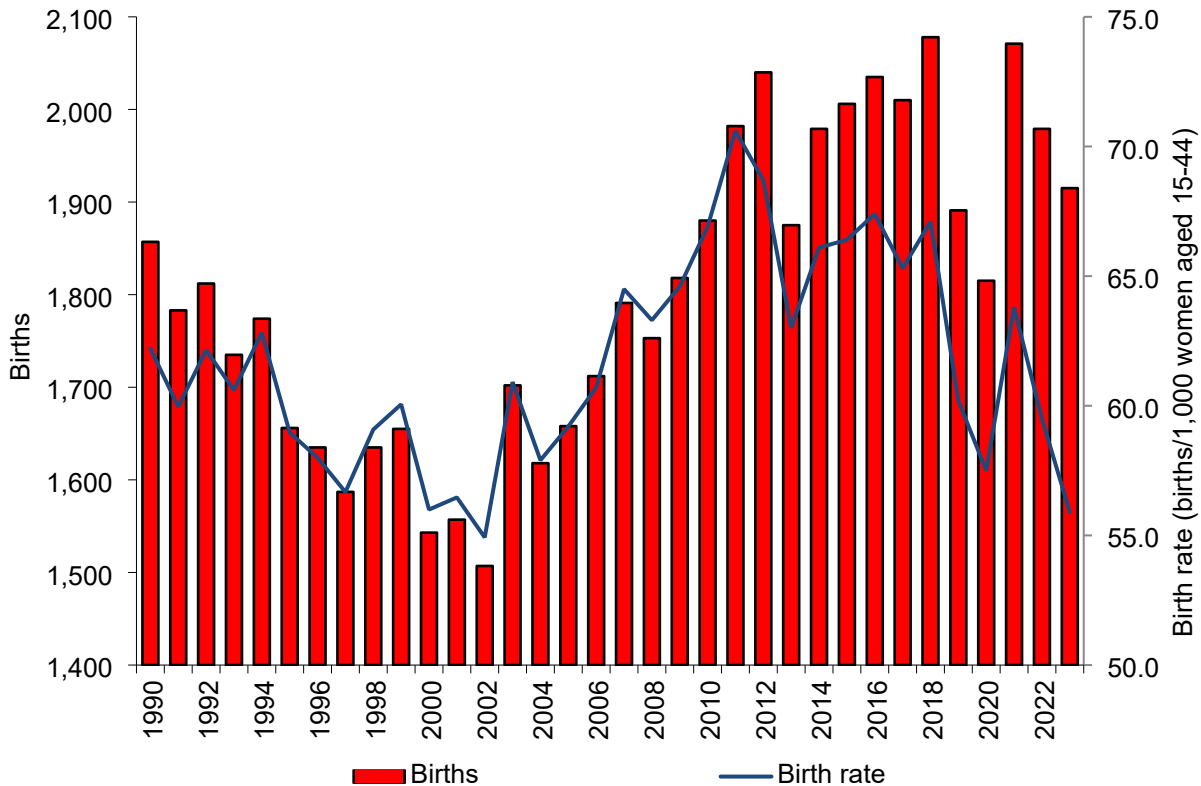
## Birth Rate and Births Analysis

The charts below set out the birth rates for the Borough and the number of recorded births.

### Maidstone, Kent and England & Wales birth rates 1990-2023



### Maidstone births and birth rate 1990-2023



## Maidstone Forecasts

### Primary - Year R Surplus/Deficit Capacity if No Further Action is Taken

Planning Group name	2023-24 capacity	2023-24 (A)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-34 (F)	2033-34 capacity
Maidstone Central and South	285	26	12	28	27	22	22	21	20	18	17	16	285
Maidstone North	530	30	16	61	37	83	90	93	97	101	106	109	530
Maidstone West	460	8	34	46	2	11	13	11	11	11	11	10	460
Maidstone South East	327	9	11	49	13	37	36	32	30	27	25	23	327
Lenham and Harrietsham	118	13	27	11	12	7	6	4	3	2	1	0	118
Coxheath	129	1	-14	-29	-16	-38	-39	-41	-43	-44	-44	-44	129
Marden and Staplehurst	145	34	31	-13	-4	-13	-16	-20	-23	-26	-28	-30	165
Maidstone Rural South East	140	19	5	16	1	-9	-10	-11	-12	-13	-13	-13	140
<b>Maidstone</b>	<b>2,134</b>	<b>140</b>	<b>122</b>	<b>170</b>	<b>72</b>	<b>98</b>	<b>101</b>	<b>89</b>	<b>82</b>	<b>77</b>	<b>75</b>	<b>71</b>	<b>2,154</b>

### Secondary - Year 7 Surplus/Deficit Capacity if No Further Action is Taken

Planning Group name	2023-24 capacity	2023-24 (A)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-34 (F)	2033-34 capacity
Maidstone Non-Selective	1,620	-12	-107	-129	-151	-194	-254	-315	-264	-260	-210	-299	1,560
Maidstone and Malling Selective	815	6	37	27	20	-8	-25	-50	-24	-32	-14	-47	815



## **Primary District commentary**

Overall, forecasts indicate that there will be sufficient places for Year R across the Plan period for the Maidstone district. However, there is pressure for places within the rural planning groups.

We also anticipate additional pressure from permitted developments across the town centre area of Maidstone. There are numerous projects scheduled and on-going to convert retail and office spaces into new residential dwellings under permitted development. This will potentially increase the demand for primary places across the Maidstone town centre area in excess of that indicated in the forecasts and has placed in-year pressure on schools as school-aged children move to the town.

### **Maidstone West Planning Group**

In the longer term, housing developments on the Maidstone side of Hermitage Lane will necessitate up to 2FE of additional provision. Land has been secured that would enable a 2FE primary school to be established on a site to the East of Hermitage Lane, known as Chapel Field. However, based on the current rate of housing growth, it is currently not expected to be required within the Plan period, this will continue to be reviewed as houses are occupied. The location on the boundary between Maidstone and Tonbridge and Malling means that it is important to consider demand arising from housing growth local to the site in both Maidstone North and East Malling when anticipating the timing of the school's establishment.

### **Lenham and Harrietsham Planning Group**

The planning group forecast indicates that a surplus of 12 places in 2026-25 drops sharply in 2027-28 to just 7 places and this small surplus continues to diminish throughout the Plan period. We will monitor the situation carefully to assess whether additional provision is needed and, subject to a review of future forecast demand, will commission an expansion of an existing school in 2027-28. This demand will be dependent on the pace and scale of housing development.

### **Marden and Staplehurst Planning Group**

The planning group is forecast to have a 13 place deficit in 2025-26 that reduces to 4 in 2026-27, before returning to a 13 place deficit the following year and thereafter, the deficit increases throughout the Plan period. We will commission up to 30 additional places within the existing schools in the planning group.

### **Coxheath Planning Group**

The forecast show deficit in excess of 1 FE forecast throughout the Plan period, with the exception of 2026-27 when the deficit dips to 16. We will seek to offer up to 30 additional temporary places in the initial year of the Plan period to ensure sufficient places for the short-term, before commissioning a 1FE permanent expansion of Coxheath Primary School in 2026-27.

### **Maidstone Rural South East Planning Group**

The planning group is forecast to have a deficit of places for the Plan period apart from in 2026-27 when a one place surplus is anticipated. The deficit increases slowly from 9 places in 2027-28 but is still below half a form of entry by the end of the Plan period. We will monitor the situation carefully to assess whether additional provision is needed, however, we anticipate that there will be sufficient places in neighbouring planning groups to meet the demand.

## **Secondary District Commentary**

There are two planning groups which are within Maidstone Borough, one non-selective and one selective (See appendix 12.2 for the non-selective and selective planning group maps). The commentary below outlines the forecast position for each of the planning groups.

### **Maidstone Non-Selective Planning Group**

There are eight schools in the Maidstone non-selective planning group: Cornwallis Academy, The Lenham School, Maplesden Noakes School, New Line Learning Academy, School of Science and Technology, St. Augustine Academy, St. Simon Stock Catholic School and Valley Park School.

The planning group is in deficit throughout the Plan period, with the initial deficit of 107 places (in excess of 3.5FE) gradually increasing to a high of 315 places (greater than 10 FE) in 2029-30. After 2029-30, the longer-term forecast suggests that the deficit will decrease slightly but will remain significant if not mitigation action is taken.

In recent years, schools within this planning group have admitted over PAN, creating additional capacity. We anticipate this pattern to continue and will accommodate some of the forecast deficit. However, up to 90 temporary places via bulge provision within the existing Secondary schools will be needed to meet the demand for places during the initial 2 years of the Plan period and this increases to 120 temporary places in 2027-28.

We anticipate the need for the establishment of a new secondary school no later than 2028-29 and will seek to work with partners, including the DfE, to identify an appropriate and available location within the Borough over the coming year.

### **Maidstone and Malling Selective Planning Group**

There are four schools in the Maidstone selective planning group: Invicta Grammar School, Maidstone Grammar School, Maidstone Grammar School for Girls and Oakwood Park Grammar School.

The forecast for the planning group indicates that there will be sufficient places in 2025-26 and 2026-27. However, in 2027-28 there will be a deficit of 8 places that then increases markedly from 2028-29, with fluctuating deficits of around a 1 FE forecast through to the end of forecast period in 2033-34. Therefore, in the longer term, subject to the pace and school of housing development, it will be necessary to expand an existing school by 1 FE.

## Planned Commissioning – Maidstone

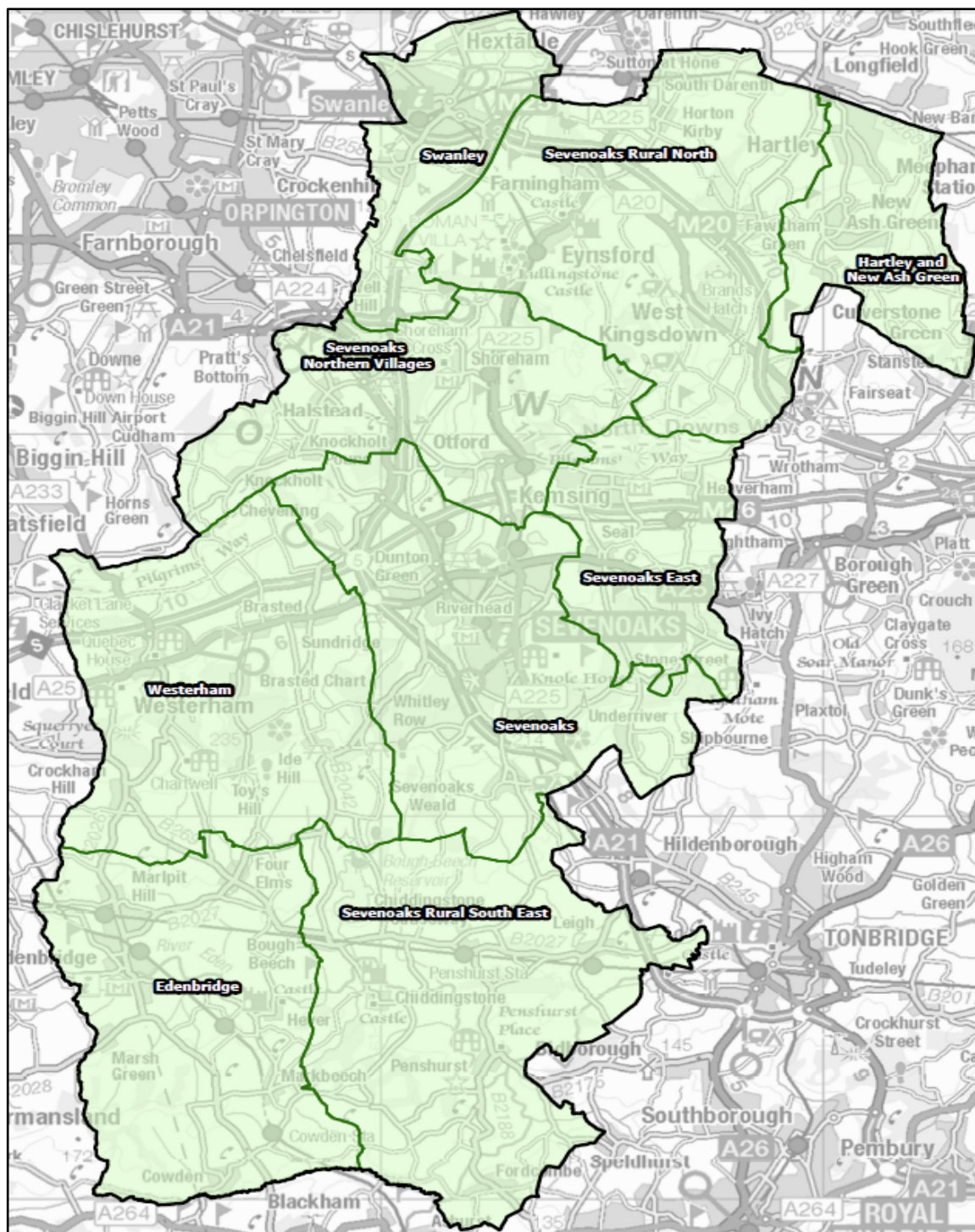
Planning Group	By 2025-26	By 2026-27	By 2027-28	By 2028-29	Between 2029-32	Post 2032
<b>Maidstone West</b>				New 2FE School on East of Hermitage Lane		
<b>Lenham and Harrietsham Planning Group</b>			1 FE permanent expansion of existing school			
<b>Marden and Staplehurst</b>	Up to 15 temporary Places		Up to 15 permanent Places			
<b>Coxheath</b>	Up to 30 temporary places	1FE permanent expansion of Coxheath school				
<b>Maidstone Non-Selective Planning Group</b>	Up to 90 temporary Year 7 places in existing schools	Up to 90 temporary Year 7 places in existing schools	Up to 120 temporary Year 7 places in existing schools	Establishment of new 6FE secondary school		
<b>Maidstone and Malling Selective Planning Group</b>				1 FE permanent expansion of existing school		

## 7.8. Sevenoaks

### District Summary

- The birth rate in Sevenoaks rose in 2021, but declined markedly in 2022 and 2023. However, it is still above the County and National averages. The number of births has followed a similar trend and dropped significant to 1092 in 2023, which is lowest for more than 20 years.
- There remain significant surplus Year R places in all planning areas, across the district, for the duration of the Plan period. KCC has initiated discussions with some of the primary schools where the surplus is more acute, about how they will seek to maintain financial viability, where surpluses appear excessive. This will be done by proposing a reduction in PAN through the annual admissions consultation, or when the need appears more urgent, through In Year Variation. However, KCC is cognisant of the imminent publication of the Sevenoaks Local Plan (see below), and the impact of the Local Plan on existing primary surplus.
- The Sevenoaks and Borough Green Non-Selective Secondary planning group is forecast to show a small surplus in most years, with only September 2026 indicating a small deficit of 0.5FE. Currently, KCC plan no intervention action, although the numbers will be monitored over the forthcoming years and once the Sevenoaks Local Plan is published.
- For much of the Plan period in the Dartford and Swanley Non-Selective planning group, there is a small surplus. This turns into a deficit of 1FE in September 2028, before returning to a small surplus a year later.
- The West Kent Selective planning group has small deficits forecast during the Plan period that will require additional temporary bulge provision.
- Sevenoaks District Council is expected to publish a new Local Plan within the next 12 months that will indicate building a significant number of new dwellings in the years up to 2040. Sevenoaks District Council has consulted on their Infrastructure Delivery Plan to identify the essential community infrastructure that will be required. This plan suggests that about 10,000 new homes will be provided by the Local Plan, with 2,500 alone being proposed for a new development at Pedham Place which will necessitate a new secondary school and two new primary schools.
- Prior to the publication of the Local Plan, new housing development sites have already been identified with Fort Halstead, Four Elms Road and Sevenoaks Quarry being progressed before the new plan is published. Fort Halstead and Sevenoaks Quarry sites have the potential for a new Primary School if sufficient demand for new provision materialises.

## Map of the Sevenoaks Primary Planning Groups



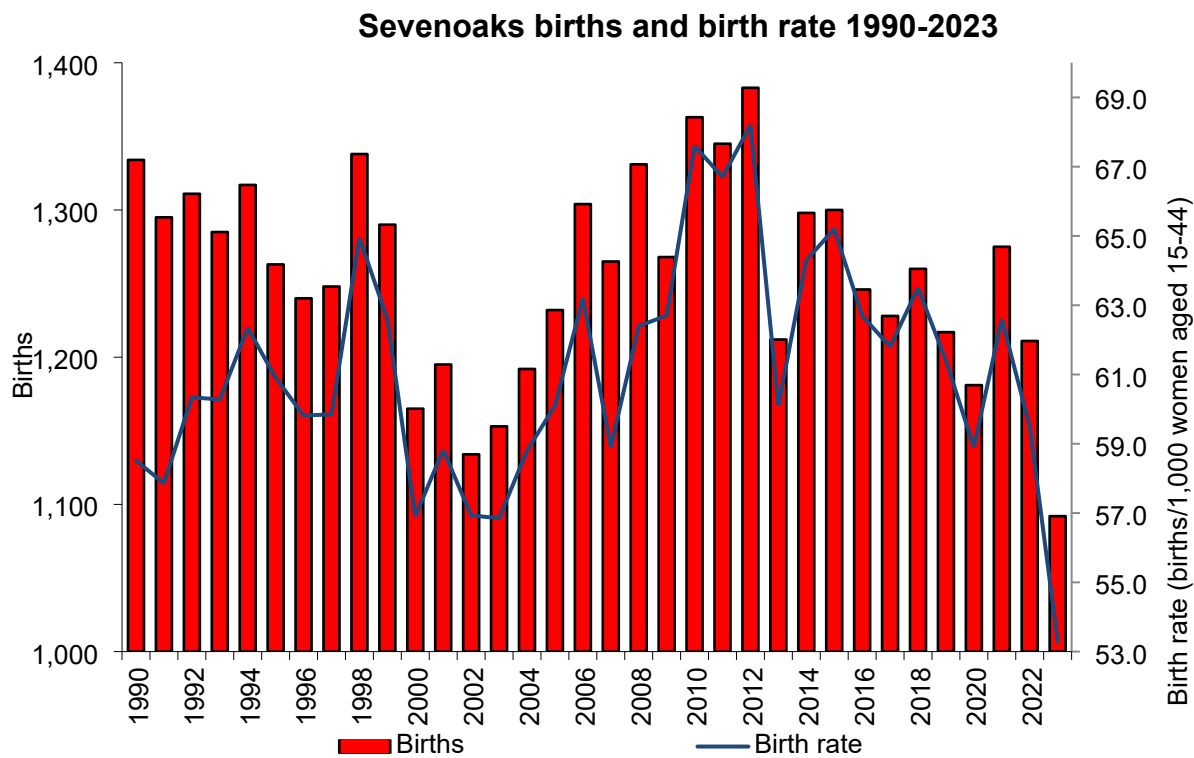
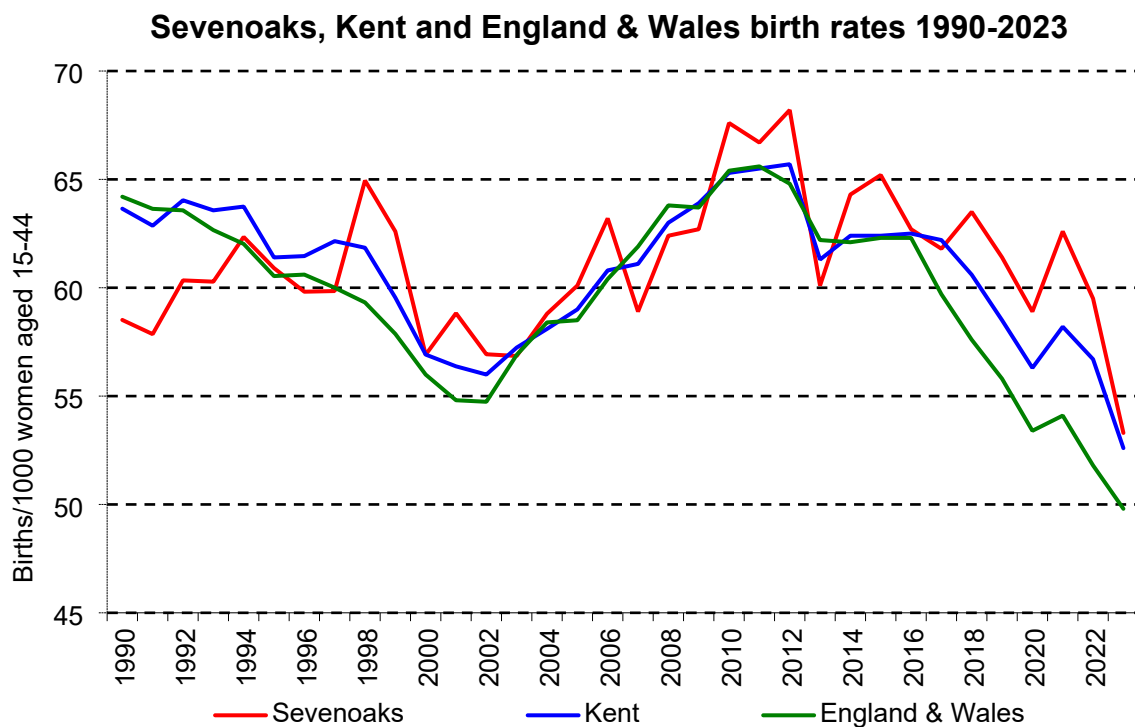
## Sevenoaks Primary Schools by Planning Group

Planning group	School	Status
Swanley	Crockenhill Primary School	Community
	Downsview Community Primary School	Community
	Hextable Primary School	Community
	High Firs Primary School	Community
	Horizon Primary Academy	Academy
	St. Bartholomew's RC Primary School	Voluntary Aided
	St. Mary's CE Primary School (Swanley)	Voluntary Aided
	St. Paul's CE Primary School	Voluntary Controlled

Planning group	School	Status
Sevenoaks Rural North	Anthony Roper Primary School	Foundation
	Fawkham CE Primary School	Voluntary Controlled
	Horton Kirby CE Primary School	Academy
	St. Edmund's Church of England Primary School	Voluntary Controlled
Hartley and New Ash Green	Leigh Academy Hartley	Academy
	New Ash Green Primary School	Community
	Our Lady of Hartley RC Primary School	Academy
Sevenoaks Northern Villages	Halstead Community Primary School	Academy
	Otford Primary School	Community
	Shoreham Village School	Community
	St. Katharine's Knockholt CE Primary School	Voluntary Aided
Sevenoaks East	Kemsing Primary School	Community
	Seal Church of England Primary School	Academy
	St. Lawrence CE Primary School	Voluntary Controlled
Sevenoaks	Amherst School	Academy
	Chevening St. Botolph's CE Primary School	Voluntary Aided
	Dunton Green Primary School	Community
	Lady Boswell's CE Primary School	Voluntary Aided
	Riverhead Infant School	Community
	Sevenoaks Primary School	Community
	St. John's CE Primary School (Sevenoaks)	Voluntary Controlled
	St. Thomas' RC Primary School (Sevenoaks)	Academy
Weald Community Primary School	Community	
Westerham	Churchill CE Primary School (Westerham)	Voluntary Controlled
	Crockham Hill CE Primary School	Voluntary Controlled
	Ide Hill CE Primary School	Voluntary Aided
	Sundridge and Brasted CE Primary School	Voluntary Controlled
Edenbridge	Edenbridge Primary School	Academy
	Four Elms Primary School	Academy
	Hever CE Primary School	Voluntary Aided
Sevenoaks Rural South East	Chiddingstone CE School	Academy
	Fordcombe CE Primary School	Academy
	Leigh Primary School	Community
	Penshurst CE Primary School	Voluntary Aided

## Birth Rate and Births Analysis

The charts below set out the birth rates for the district and the number of recorded births.





## Sevenoaks Forecasts

### Primary - Year R Surplus/Deficit Capacity if No Further Action is Taken

Planning Group name	2023-24 capacity	2023-24 (A)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-34 (F)	2033-34 capacity
Swanley	305	23	56	19	22	47	45	44	44	44	45	45	300
Sevenoaks Rural North	120	24	20	7	10	23	24	26	28	30	33	35	120
Hartley and New Ash Green	150	15	16	6	31	23	26	30	34	38	42	46	150
Sevenoaks Northern Villages	130	53	54	46	55	61	60	58	57	56	55	56	130
Sevenoaks East	102	15	20	8	17	27	26	26	26	27	27	28	102
Sevenoaks	390	60	109	87	84	126	122	118	114	110	107	103	390
Westerham	117	30	3	8	16	16	16	16	15	15	15	15	87
Ordenbridge	105	4	18	8	5	10	9	9	8	7	7	6	105
Sevenoaks Rural South East	83	21	11	20	12	20	20	20	21	21	21	21	83
<b>Sevenoaks</b>	<b>1,502</b>	<b>245</b>	<b>307</b>	<b>209</b>	<b>252</b>	<b>353</b>	<b>349</b>	<b>347</b>	<b>348</b>	<b>349</b>	<b>351</b>	<b>355</b>	<b>1,467</b>

### Secondary - Year 7 Surplus/Deficit Capacity if No Further Action is Taken

Planning Group name	2023-24 capacity	2023-24 (A)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-34 (F)	2033-34 capacity
NS - Dartford and Swanley	1,320	7	4	71	76	15	-36	2	-6	30	24	-16	1,440
NS - Sevenoaks and Borough Green	610	-25	-31	22	-15	11	5	13	16	59	11	32	630
SG - West Kent	1,270	-23	-33	19	-46	-20	-29	-12	37	61	51	71	1,264



## **Primary District commentary**

The Year R forecast indicates that no additional Primary capacity is needed. The levels of surplus forecast have persisted for two years now and individual schools may start to face viability issues. KCC is working with schools across the district to monitor the situation and to take mitigating action where necessary. Over the next three years, KCC is supporting three schools to reduce their PAN; two through the admission consultation, and one through In Year Variation. These reductions are not reflected in the forecasts, but the reductions will reduce the amount of capacity in Sevenoaks by 75 Year R places per year.

However, forecasts do not take into account any further new housing development that Sevenoaks District Council (SDC) may approve prior to the publication of its new Local Plan (windfall sites), and any new housing that may be included in the new Sevenoaks District Local Plan, that has not been notified to KCC already.

Two already consented sites in Fort Halstead and Sevenoaks Quarry will create demand for Primary places. KCC is in discussion with Sevenoaks District Council on how best to accommodate this. A third significant housing development site on the Four Elms Road in Edenbridge has been approved. This will add to the demand for primary provision, but it is likely that it can be managed locally. KCC will be assessing the impact of this development against existing capacity.

Where there is the potential for demand to exceed capacity, for example, in Edenbridge, such demand currently looks as if it can be accommodated in adjacent planning groups. This situation will be monitored and may be re-assessed following publication of the Local Plan. Until KCC has assessed the new Local Plan, it would be unwise to propose significant reduction of capacity in existing primary schools.

Longer term, the new development on Pedham Place will, if consented, support two new 2FE primary schools.

## **Secondary District Commentary**

There are two non-selective and one selective Secondary planning groups that are fully or partially within Sevenoaks District. See appendix 13.2 for the secondary planning group maps.

Sevenoaks has traditionally had a shortfall in capacity for both selective and non-selective, with a number of students who are resident in Sevenoaks, travelling out of the district to attend selective or faith education. However, the recent completion of the new satellite of Tunbridge Wells Grammar School for Boys provided a grammar provision for boys, complementing the girl's provision provided by the existing Weald of Kent Grammar School satellite, on the Sevenoaks Campus.

### **Dartford and Swanley Non-Selective Planning Group**

There are seven schools in the Dartford and Swanley non-selective planning group: Dartford Science and Technology College, Ebbsfleet Academy, Inspiration Academy, Leigh Academy, Orchards Academy, Stone Lodge School and Wilmington Academy. All the schools are in Dartford Borough, except for Orchards Academy which is in Sevenoaks District.

Demand is manageable without any intervention for the next two years, but provision falls into deficit from 2028 by 1FE. This demand fluctuates for the remainder of the Plan period.

To manage the demand that will be derived from the additional housebuilding, the new secondary provision at the Alkerden all-through school, will be expanded to its full capacity of

8FE, as and when required. The pupil forecasts in this section only include the 4FE that will be commissioned when the school opens (in temporary accommodation, scheduled for one year) in 2025.

Also included in the forecasts is the 2FE that KCC have commissioned at the Leigh Academy.

### **Sevenoaks and Borough Green Non-Selective Planning Group**

There are three schools in the Sevenoaks and Borough Green non-selective planning group: Knole Academy, Wrotham School and Trinity School.

The forecast indicates fluctuating demand for Year 7 places for the beginning of the Plan period. There is a small deficit of 15 places forecast in September 2026 and small surpluses through the remainder of the Plan period.

A key factor in this planning group is the impact of the publication of the Sevenoaks Local Plan, which has been explained above. Should the Sevenoaks Local Plan be agreed in the near future, additional housing will see the secondary need increase. KCC has notified Sevenoaks District Council that there is no opportunity to expand any of the existing schools, and that any increase in secondary provision must be accommodated with a new school.

Sevenoaks have indicated that a new development site is being considered in the north of the planning group, at Pedham Place, a former golf course, providing about 2500 new homes. This development must also provide a new secondary school.

No decisions can be made until the Local Plan is published, but it is possible that a new secondary school could be provided in Edenbridge where there is a site that is being held for a new secondary school, if required. The commissioning of a new school in Edenbridge depends on its financial viability. The Department for Education has indicated in the past, a preference for any new secondary schools to be larger (>5FE), rather than smaller (4 - 5FE), which impacts on viability.

Currently, there is insufficient demand in Edenbridge and its environs, to support a new secondary school. If sufficient new housing was outlined in the new Local Plan, or through windfall sites, KCC will again consider whether a new school in Edenbridge is viable.

### **West Kent Selective Planning Group**

There are six schools in the planning group: Judd School, Tonbridge Grammar School, Weald of Kent Grammar School, Skinners' School, Tunbridge Wells Girls' Grammar School and Tunbridge Wells Grammar School for Boys. Tunbridge Wells Grammar School for Boys, and Weald of Kent Grammar School both operate satellites in Sevenoaks district.

The Tunbridge Wells Grammar School for Boys provides 3FE and includes a sixth form provision, while the Weald of Kent Grammar School provides 4FE for Grammar eligible girls, with their sixth form being provided on the main school site in Tonbridge.

The move by Weald of Kent Grammar School to increase their number of places available on the Sevenoaks campus is a de facto increase of 1FE for Sevenoaks, even if it is not an actual increase for the school. This supports the need for more Grammar school places in the wider North Kent area.

### **Special Educational Needs**

Demand for special school places, for all categories, remains high. KCC needed to commission a new 250 place special school for Profound Severe and Complex Needs.

The old Birchwood Primary School site on Russell Way in Swanley was identified as suitable, and a bid was subsequently submitted for a new Special School through KCC’s Safety Valve submission. The bid for DfE funding was successful, and it is anticipated the new school will be opened by September 2027. A provider has been chosen by the DfE through open competition during this year, with the winner being the Leigh Academy Trust. Given the nature of Special Schools and the distances that students travel to receive an appropriate education, the provision will be designed to cater for students in the whole North Kent area.

There are currently no primary Specialist Resourced Provisions (SRP) in Sevenoaks District. KCC has concluded the review of SRP provision across Kent. Should a need for new provision be identified, KCC will ensure new provision is commissioned, where possible, throughout the Plan period.

**Planned Commissioning – Sevenoaks**

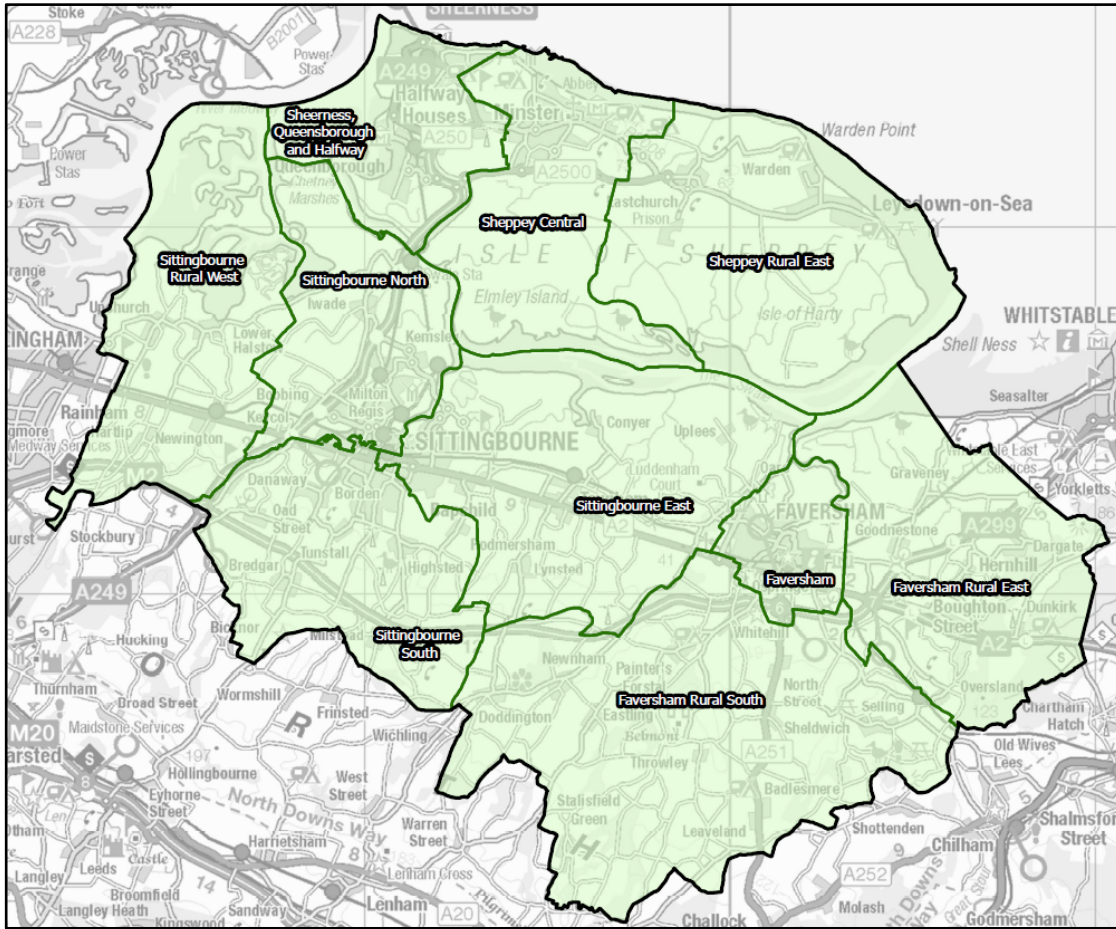
<b>Planning Group</b>	<b>By 2025-26</b>	<b>By 2026-27</b>	<b>By 2027-28</b>	<b>By 2028-29</b>	<b>Between 2029-32</b>	<b>Post 2032</b>
<b>Dartford and Swanley Non-Selective Planning Group</b>			2FE expansion at Alkerden	2FE expansion at Alkerden		
<b>West Kent Selective</b>		Up to 60 temporary places	Up to 30 temporary places	Up to 30 temporary places		
<b>Special Schools</b>			1 x New 250 place special school for Profound Severe and Complex Needs covering all of North Kent			

## 7.9. Swale

### District commentary

- The birth rate for Swale remains slightly above the County and National averages and follows a similar pattern with a notable decline in the rate from 2016 to 2020, before recovering slightly in 2021 and then declining again in 2022 and 2023. The number of births recorded follows a similar pattern.
- We forecast surplus primary places across the District throughout the Plan period with up to 247 places (8.2FE) for Year R in 2027/28, however there are variances across the planning groups.
- Within the secondary sector, we forecast a pressure in the Sittingbourne non-selective planning group of up to -162 Year 7 places (5.4FE) in 2027/28 and Faversham Planning Group of -22 Year 7 (0.7FE), whilst for the Isle of Sheppey we forecast a surplus of places across the plan period with up to 34 Year 7 places in 2028/29 (1.1FE).
- Swale Borough Council's Local Plan, adopted in July 2017, proposes a total of 13,192 new homes over the Plan period to 2031 with approximately 776 dwellings per year. During the 2013/14 to 2022/23 a total of 6,868 houses were completed (NET) with an average of 687 dwellings per year.
- Swale Borough Council is in the process of reviewing their current local plan and have agreed the Local Development Scheme 2024 (LDS) The LDS sets out the timetable for the Councils Local Plan Review and states that a draft Plan Regulation 18 consultation will be carried out in the fourth quarter of 2024, with a Regulation 19 pre submission consultation in the first quarter of 2025 and submission of the councils Local Plan for the end of the second quarter in 2025.

## Map of the Swale Primary Planning Groups



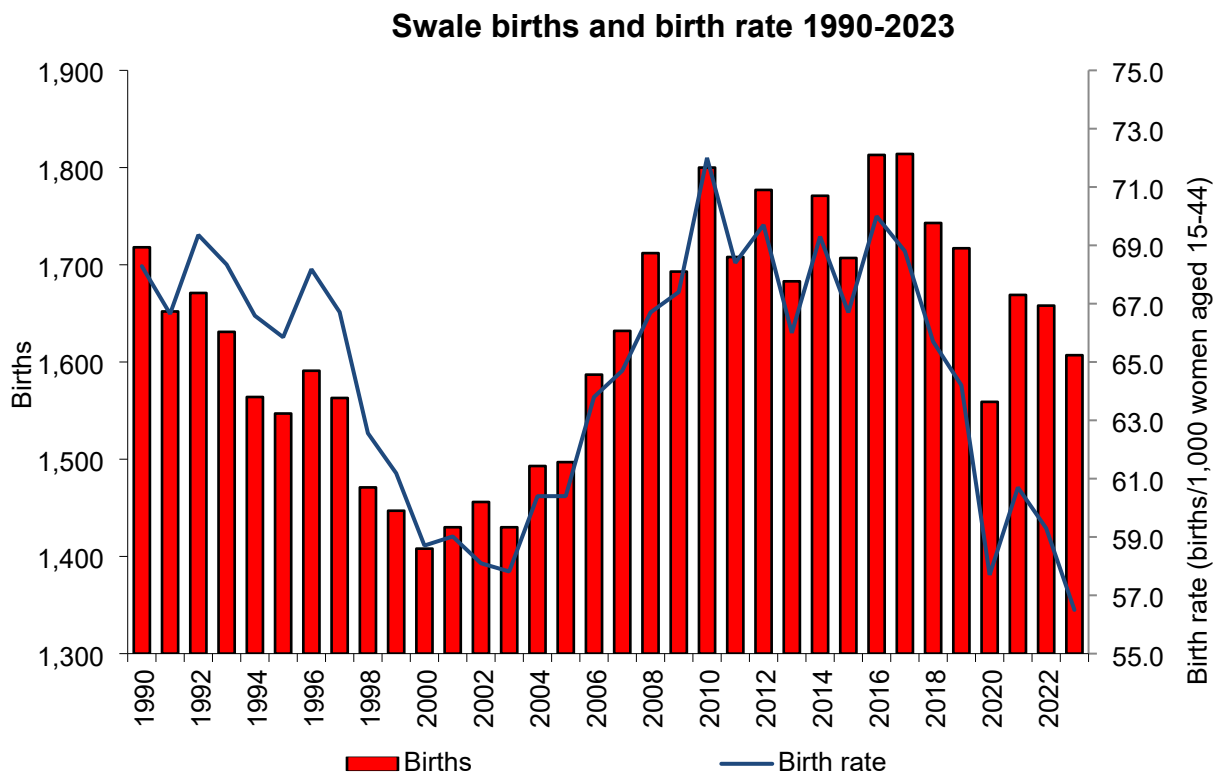
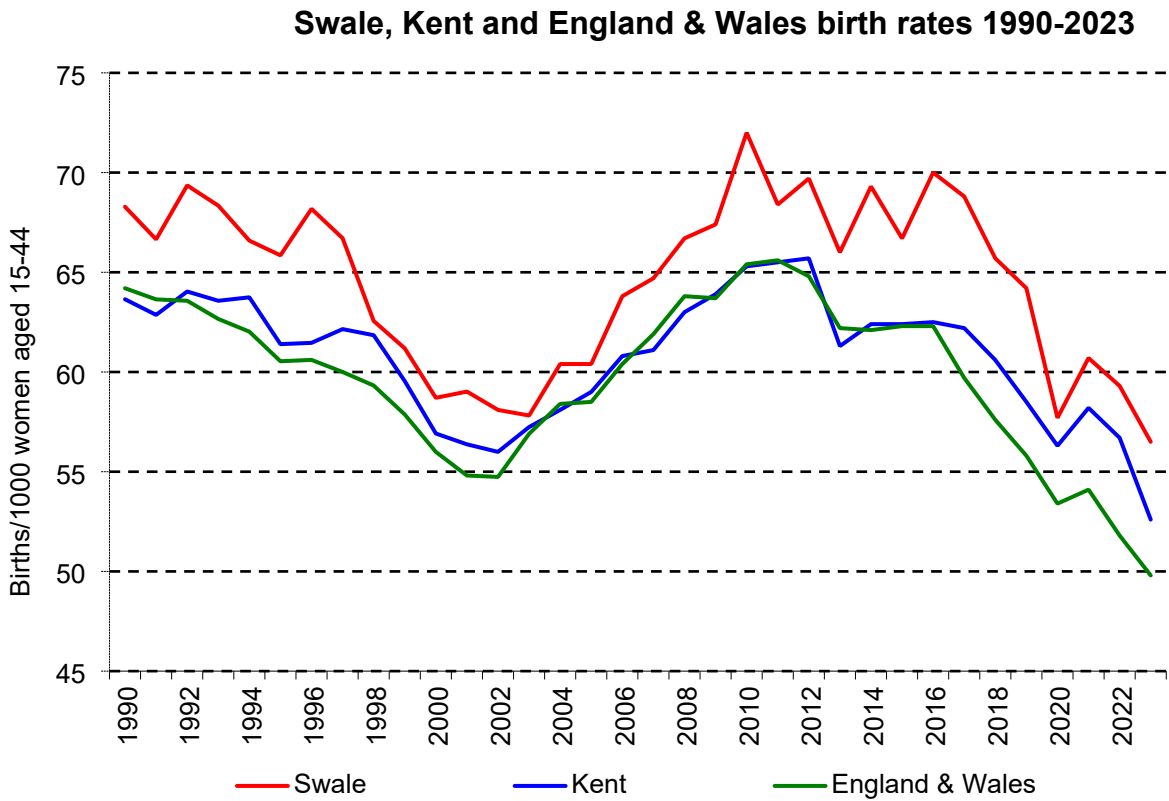
## Swale Primary Schools by Planning Group

Planning groups	School	Status
Faversham	Bysing Wood Primary School	Academy
	Davington Primary School	Community
	Ethelbert Road Primary School	Community
	Luddenham School	Academy
	Ospringe CE Primary School	Voluntary Controlled
	St. Mary of Charity CE Primary School	Academy
Faversham Rural East	Boughton-under-Blean and Dunkirk Primary School	Voluntary Controlled
	Graveney Primary School	Academy
	Hernhill CE Primary School	Voluntary Controlled
Faversham Rural South	Eastling Primary School	Community
	Selling CE Primary School	Academy
	Sheldwich Primary School	Academy
Sittingbourne East	Bapchild and Tonge CE Primary School	Voluntary Aided
	Canterbury Road Primary School	Community
	Lansdowne Primary School	Academy
	Lynsted and Norton Primary School	Academy
	South Avenue Primary School	Academy
	Sunny Bank Primary School	Academy
Sittingbourne South	Teynham Parochial CE Primary School	Voluntary Controlled
	Borden CE Primary School	Academy
	Bredgar CE Primary School	Academy
	Milstead and Frinsted CE Primary School	Academy

Planning groups	School	Status
	Minterne Community Junior School	Academy
	Oaks Community Infant School	Academy
	Rodmersham Primary School	Community
	St. Peter's RC Primary School (Sittingbourne)	Academy
	Tunstall CE Primary School	Voluntary Aided
	Westlands Primary School	Academy
Sittingbourne North	Bobbing Village School	Academy
	Grove Park Primary School	Academy
	Iwade School	Academy
	Kemsley Primary Academy	Academy
	Milton Court Primary Academy	Academy
	Regis Manor Primary School	Academy
Sittingbourne Rural West	Hartlip Endowed CE Primary School	Voluntary Aided
	Holywell Primary School	Academy
	Lower Halstow Primary School	Community
	Newington CE Primary School	Voluntary Controlled
Sheerness, Queenborough and Halfway	Halfway Houses Primary School	Academy
	Queenborough School	Academy
	Richmond Academy	Academy
	Rose Street Primary School	Community
	St. Edward's RC Primary School	Academy
	West Minster Primary School	Community
Sheppey central	Minster in Sheppey Primary School	Academy
	St. George's CE Primary School (Minster)	Academy
	Thistle Hill Academy	Academy
Sheppey Rural East	Eastchurch CE Primary School	Academy
	St Clements CE Primary School	Academy

## Birth Rate and Births Analysis

The charts below set out the birth rates for the Borough and the number of recorded births.



## Swale Forecasts

### Primary - Year R Surplus/Deficit Capacity if No Further Action is Taken

Planning Group name	2023-24 capacity	2023-24 (A)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-34 (F)	2033-34 capacity
Faversham	240	27	43	16	10	-14	-12	-10	-8	-7	-5	-4	240
Faversham Rural East	75	1	7	12	4	3	4	4	5	6	7	8	75
Faversham Rural South	75	22	4	5	6	-1	-1	0	0	1	1	2	60
Sittingbourne East	270	18	61	31	54	69	68	66	65	65	64	62	285
Sittingbourne South	305	21	32	20	6	32	31	29	28	27	26	25	300
Sittingbourne North	330	3	30	32	21	36	32	28	24	20	16	12	330
Sittingbourne Rural West	105	3	2	5	13	-2	-2	-3	-3	-3	-3	-2	105
Sheerness, Queenborough and Halfway	390	60	49	45	54	60	60	60	60	60	61	60	330
Sheppey Central	210	25	61	63	51	54	55	54	55	55	55	55	210
Sheppey Rural East	60	26	17	20	12	11	10	10	9	8	8	7	60
<b>Swale</b>	<b>2,060</b>	<b>206</b>	<b>307</b>	<b>249</b>	<b>232</b>	<b>247</b>	<b>244</b>	<b>239</b>	<b>235</b>	<b>233</b>	<b>231</b>	<b>225</b>	<b>1,995</b>

### Secondary - Year 7 Surplus/Deficit Capacity if No Further Action is Taken

Planning Group name	2023-24 capacity	2023-24 (A)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-34 (F)	2033-34 capacity
Faversham Non-Selective	210	26	9	23	14	-22	-14	-11	-29	-10	-30	-36	210
Isle of Sheppey Non-Selective	390	71	39	34	34	28	34	22	30	54	74	70	330
Sittingbourne Non-Selective	810	-29	-64	-92	-72	-162	-123	-110	-133	-51	-50	-61	765
Canterbury and Faversham Selective	645	-15	6	20	5	-47	-35	-36	-39	-2	-31	-37	645
Sittingbourne and Sheppey Selective	270	-9	20	18	24	-3	15	9	8	36	39	34	300



## **Primary District Commentary**

Forecasts indicate that across Swale district there will be surplus capacity for Year R throughout the plan period. Year R surplus capacity peaks at 247 places (8.2FE) in 2027/28 for the district, however there are differences across the primary planning groups with place pressures in Sittingbourne Rural West and Faversham and surplus across the Isle of Sheppey Planning Groups.

### **Faversham Planning Group**

Forecasts indicate from 2027/2028 a pressure on places for Year R of -14 (0.5FE), which slowly declines. There are several housing developments and strategic sites in Faversham and dependent on the rate of build-out and occupation of these sites, it is likely that there will be a need for additional capacity. Feasibilities have been undertaken for the future expansion of St Mary's of Charity by 1FE to meet this need when required.

### **Sittingbourne East Planning Group**

Forecasts indicate a surplus of up to 2FE Year R places in Sittingbourne East Planning Group throughout the plan period. It is anticipated that new housing developments in the planning area will increase the need for places. A 1FE expansion of Teynham Primary School, combined with a rebuild of the school, is planned for September 2026 to meet the demand that will arise linked to the housing developments in and around Teynham.

### **Sittingbourne South and North Planning Groups**

Forecasts indicate an ongoing 1FE surplus of places in both Sittingbourne North and Sittingbourne South Planning Groups from 2027/28. It is anticipated that medium to long term, as new housing developments are built and occupied a new 2FE primary school will be established to serve the need from the Wises Lane development in the Sittingbourne South Planning area.

### **Sittingbourne Rural West Planning Group**

Forecasts show a small deficit of places from 2027/2028. It is anticipated that surplus capacity in adjacent primary planning areas will provide sufficient places across the plan period.

### **Sheerness, Queenborough and Halfway, Sheppey Central and Sheppey Rural East Planning Groups**

Forecasts indicate an ongoing surplus of places of 4FE across these three planning groups throughout the plan period. Discussions will take place with the schools on managing this surplus to ensure schools remain viable.

## **Secondary District Commentary**

There are five planning groups within Swale district, or which cross the district boundary (See appendix 13.2 for the non-selective and selective planning group maps). Three of which are non-selective (Faversham, Isle of Sheppey and Sittingbourne) and two selective (Sittingbourne and Sheppey, and Canterbury and Faversham). The commentary below outlines the forecast position for each of the planning groups.

### **Faversham Non-Selective Planning Group**

The Abbey School is the only non-selective school in Faversham.

Forecasts indicate from 2027/28 a pressure on places of up to 1FE continuing throughout the plan period. All the housing developments for Faversham identified in the current Local Plan are being built-out and a 1FE permanent expansion of The Abbey School will be required with a

further 1FE of capacity potentially required to meet the need later in the forecast period as housing occupations increase.

### **Isle of Sheppey Non-Selective Planning Group**

There are two schools in the Isle of Sheppey non-selective planning group: East Kent College Sheppey Secondary and Leigh Academy Minster.

Forecasts for Year 7 show a continuing surplus of places over the Plan period of between 1.1 FE in 2025/2026 to 0.7FE in 2029/2030. This surplus will help to address the deficit in the Sittingbourne non-selective planning area. The forecast surplus places are a direct result of the number of pupils travelling off the Isle of Sheppey for their education into Sittingbourne schools. This results in additional pressure on places in the Sittingbourne non-selective planning group schools. The establishment of two schools on the Isle of Sheppey for September 2024 are part of the plan to address the situation and to help reverse the level of travel off the Island to secondary schools in Sittingbourne.

### **Sittingbourne Non-Selective Planning Group**

There are three schools in the Sittingbourne non-selective planning group: Fulston Manor School, The Westlands School and The Sittingbourne School.

Forecasts indicate that for Year 7 there is a fluctuating deficit of places over the Plan period. In 2025 forecasts show a deficit of -92 (3FE) places rising to a peak of -162 (5.4FE) in 2027/28. The pressure showing in Sittingbourne is exacerbated by the numbers of pupils travelling off the Isle of Sheppey for their secondary education. Surplus capacity in Secondary provision on the Island will help to offset some of the deficit in Sittingbourne. However, temporary bulge provision will be needed from 2025-26 to 2028-29, prior to the addition of permanent provision.

In the longer term, a new 6FE secondary school on the North Sittingbourne Quinton Road housing development will be commissioned between 2029 and 2032.

### **Sittingbourne and Sheppey Selective Planning Group**

There are two Schools in the planning group, Borden Grammar School (Boys) and Highsted Grammar School (Girls).

Forecasts indicate a fluctuation of capacity across the plan period of 18 (0.6FE) in 2025/26 to 9 (03FE) in 2029/30 with a slight deficit in 2027/28.

### **Canterbury and Faversham Selective Planning Group**

There are four schools in the Canterbury and Faversham selective planning group: Barton Court Grammar School, Simon Langton Girls' Grammar School, Simon Langton Grammar School for Boys and Queen Elizabeth's Grammar School.

Forecasts indicate a surplus of places in the planning group until 2027. From 2027/28 there is a pressure forecast in the planning group of between -1.2FE and 1.5FE for Year 7 places across the Plan period. Feasibilities will be undertaken at Simon Langton Girls' School to expand the school.

## Planned Commissioning – Swale

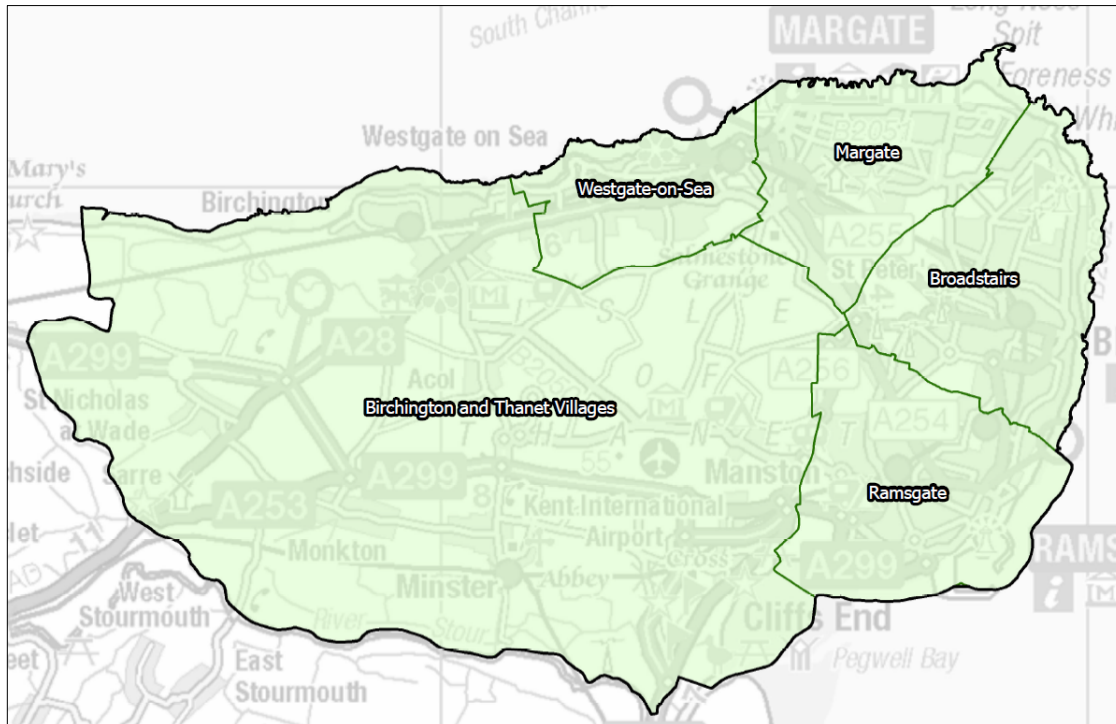
Planning Group	By 2025-26	By 2026-27	By 2027-28	By 2028-29	Between 2029-32	Post 2032
Faversham				1FE expansion of St Mary's of Charity		
Sittingbourne East		1FE expansion of Teynham PS				
Sittingbourne South					2FE new Primary School at Wises Lane	
Faversham Non-Selective			1FE expansion of Abbey School.		2 <sup>nd</sup> 1FE expansion of Abbey School	
Sittingbourne Non-selective	Up to 1FE temporary places	Up to 1FE temporary places	Up to 4FE temporary places	Up to 3FE temporary places	6FE new provision on Quinton Road	
Canterbury and Faversham Selective			1FE expansion of Simon Langton Girls School			
Special Schools			40 place expansion of Special school for SEMH with ASD to include Primary provision or a primary satellite			

## 7.10. Thanet

### District commentary

- The birth rate in Thanet fell steadily from 2017, before levelling out in 2022 and then falling significantly in 2023. The birth rate is higher than the National average, but has dipped below the County average. The number of births has similarly decreased since 2017 to a low of 1251 in 2023, which is the lowest for more than 20 years.
- We forecast surplus primary school places across the district throughout the plan period with a peak of 324 places (10.8FE) in 2028/2029.
- Within the secondary sector, Thanet non-selective planning group shows a pressure of between 26 places (0.86FE) to 65 places (2.16FE) from 2025/26 to 2029/30 when a surplus is forecast from 2030/31 of 43 places (1.43FE). There is a surplus of capacity of selective places throughout the plan period for the Thanet selective group.
- Thanet District Council's Local Plan to 2031, adopted on the 9 July 2020, includes the provision of 17,140 additional dwellings in the period up to 2031. During the 2013/14 to 2022/23 a total of 4,095 houses were completed (NET) with an average of 410 per year.
- Thanet District Council is revisiting the timetable for the Thanet Local Plan update subject to the outcome of the new Government's consultation on proposed reforms to the National Planning Policy Framework and other changes to the planning system.

## Map of the Thanet Primary Planning Groups



## Thanet Primary Schools by Planning Group

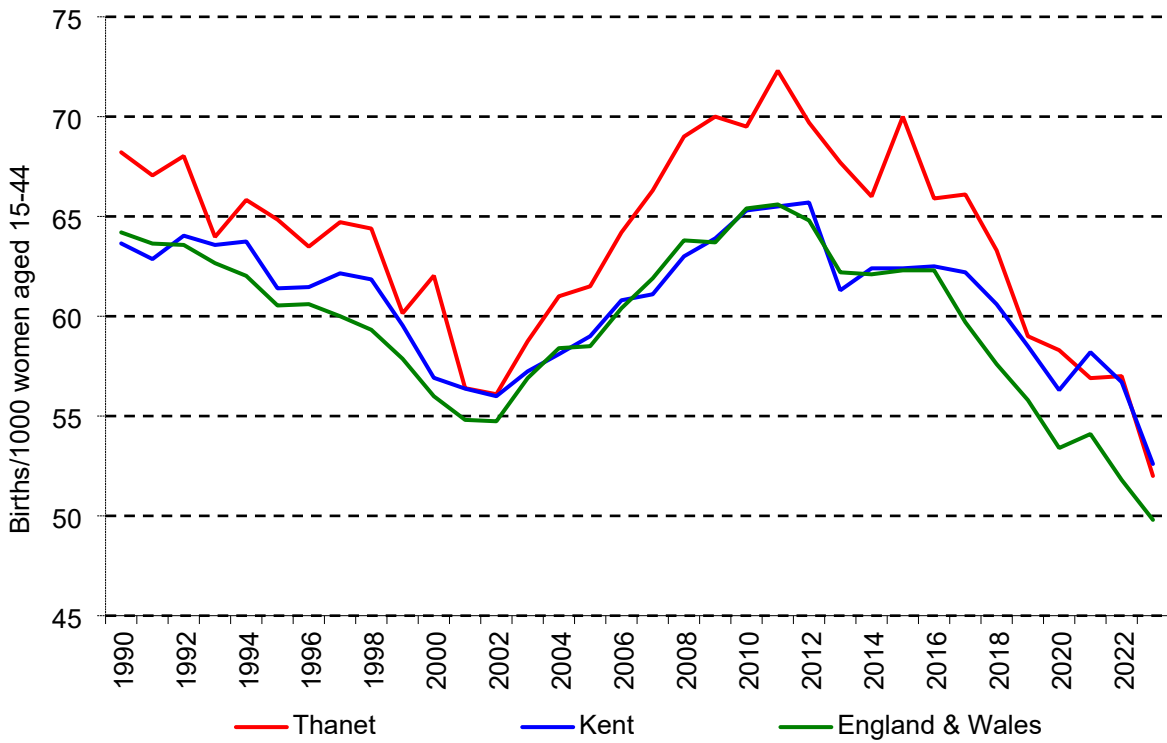
Planning Group	School	Status
Margate	Cliftonville Primary School	Academy
	Drapers Mills Primary Academy	Academy
	Holy Trinity and St. John's CE Primary School	Voluntary Controlled
	Northdown Primary School	Academy
	Palm Bay Primary School	Academy
	Salmestone Primary School	Academy
	St. Gregory's RC Primary School	Academy
Westgate-on-Sea	Garlinge Primary School	Community
	St. Crispin's Community Infant School	Community
	St. Saviour's CE Junior School	Voluntary Controlled
Ramsgate	Chilton Primary School	Academy
	Christ Church CE Junior School	Academy
	Dame Janet Primary Academy	Academy
	Ellington Infant School	Community
	Newington Community Primary School (Ramsgate)	Academy
	Newlands Primary School	Academy
	Priory Infant School	Community
	Ramsgate Arts Primary School	Free
	Ramsgate Holy Trinity CE Primary School	Voluntary Aided
	St. Ethelbert's RC Primary School	Voluntary Aided
St. Laurence-in-Thanet CE Junior Academy	Academy	
Broadstairs	Bromstone Primary School	Foundation
	Callis Grange Infant School	Community
	St. George's CE Primary School (Broadstairs)	Foundation
	St. Joseph's RC Primary School (Broadstairs)	Academy

Planning Group	School	Status
	St. Mildred's Infant School	Community
	St. Peter-in-Thamet CE Junior School	Voluntary Aided
	Upton Junior School	Academy
Birchington and Thanet Villages	Birchington CE Primary School	Voluntary Controlled
	Minster CE Primary School	Voluntary Controlled
	Monkton CE Primary School	Voluntary Controlled
	St. Nicholas at Wade CE Primary School	Voluntary Controlled

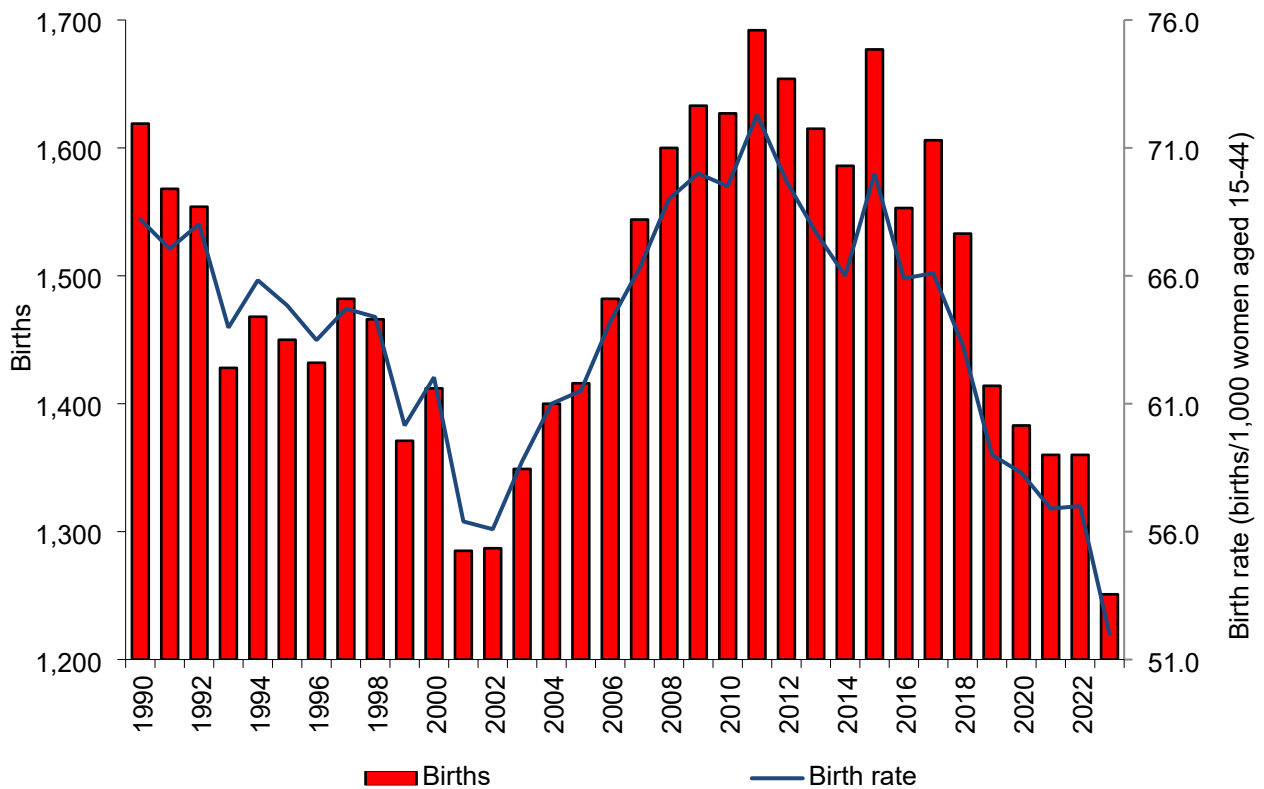
## Birth Rate and Births Analysis

The charts below set out the birth rates for the district and the number of recorded births.

### Thanet, Kent and England & Wales birth rates 1990-2023



### Thanet births and birth rate 1990-2023



## Thanet Forecasts

### Primary - Year R Surplus/Deficit Capacity if No Further Action is Taken

Planning Group name	2023-24 capacity	2023-24 (A)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-34 (F)	2033-34 capacity
Margate	435	91	79	86	74	123	126	126	127	127	127	128	420
Westgate-on-Sea	210	25	36	41	36	33	34	34	34	35	35	36	210
Ramsgate	495	73	58	114	89	111	111	115	118	121	124	126	495
Broadstairs	330	31	31	31	54	61	62	61	61	61	61	61	330
Birchington and Thanet Villages	165	31	23	13	11	-7	-10	-15	-20	-22	-24	-25	165
<b>Thanet</b>	<b>1,635</b>	<b>251</b>	<b>227</b>	<b>285</b>	<b>264</b>	<b>321</b>	<b>324</b>	<b>322</b>	<b>319</b>	<b>322</b>	<b>324</b>	<b>325</b>	<b>1,620</b>

### Secondary - Year 7 Surplus/Deficit Capacity if No Further Action is Taken

Planning Group name	2023-24 capacity	2023-24 (A)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-34 (F)	2033-34 capacity
Thanet Non Selective	1,159	1	-16	-26	-29	-30	-14	-65	43	25	72	58	1,099
Thanet Selective	345	7	8	5	5	6	17	-4	26	23	34	36	345



## **Primary District Commentary**

Forecasts indicate that Thanet district has surplus capacity for Year R places across the Plan period. Surplus capacity ranges between 8.5FE in 2025/26 to a peak of 10.8FE in 2028/29.

There are significant differences within the individual planning groups, with Margate and Ramsgate showing high levels of surplus capacity, Westgate-on-sea and Broadstairs also showing spare capacity whilst Birchington and Thanet Villages planning group has a deficit of places.

### **Margate Planning Group**

Forecasts indicate surplus Year R places across the Plan period between 2.8FE in 2025/26 to 4.2FE in 2029/30. Discussions will take place with the schools on options to manage this surplus to ensure schools remain viable. This could be through further reductions in Published Admission Numbers.

### **Ramsgate Planning Group**

Forecasts indicate surplus Year R places across the Plan period of around 3.8FE. Discussions will take place with the schools on options to manage this surplus to ensure schools remain viable. This could be through reduction in Published Admission Numbers.

Planned developments within Birchington and Thanet Villages planning group will help to reduce the current surplus as several of the villages border the Ramsgate planning group. A new 2FE primary school to serve the Manston Green Development may be required in the long term, if all housing proceeds as set out in the Local Plan.

### **Birchington and Thanet Villages Planning Group**

Forecasts indicate a pressure on Year R places in this planning group from 2027/28 that rises gradually to 0.5FE by the end of the forecast period. Initially, the surplus of places in the adjacent planning groups will support this pressure. Any future pupil pressures arising from the developments closer to the borders of the Margate and Ramsgate planning groups could initially be accommodated in Margate and Ramsgate schools due to the surplus capacity available. Birchington Primary School can also revert to a 3FE PAN to support the initial pressure from new housing in Birchington. New primary school provision to serve any new housing developments may be required later in the Plan period in Birchington and/or Westgate-on-Sea if all housing comes forward as set out in the Local Plan.

## **Secondary District Commentary**

There are two planning groups which are within Thanet district, one non-selective and one selective (See appendix 13.2 for the non-selective and selective planning group maps). The commentary below outlines the forecast position for each of the planning groups.

### **Thanet Non-Selective Planning Group**

There are six schools in the Thanet non-selective planning group: Charles Dickens School, Hartsdown Academy, King Ethelbert School, Royal Harbour Academy, St George's CE Foundation School and Ursuline College.

Forecasts indicate a deficit of places of 26 (0.9FE) in 2025/26 rising to a high of -65 (2.2FE) in 2029/30. After this, the forecast indicates a surplus of places. Discussions will be held with the Thanet non-selective schools on managing the need for places in the short term via bulge classes.

### **Thanet Selective Planning Group**

There are two schools in the Thanet selective planning group: Chatham and Clarendon Grammar School and Dane Court Grammar School. Forecasts indicate a slight fluctuation of surplus places throughout the plan period.

**Planned Commissioning – Thanet**

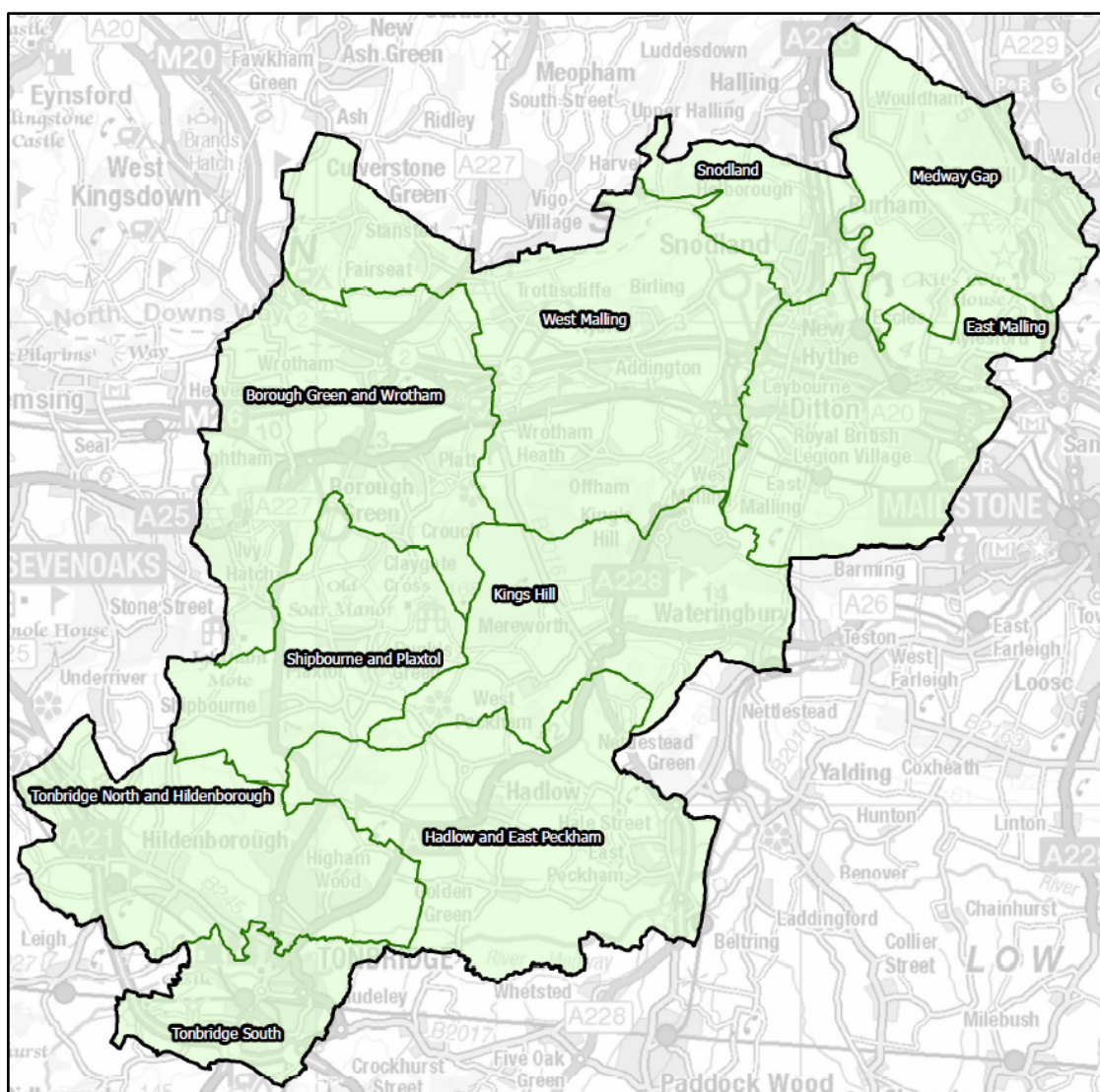
Planning Group	By 2025-26	By 2026-27	By 2027-28	By 2028-29	Between 2029-32	Post 2032
Ramsgate						2FE new primary at Manston Green
Birchington and Thanet Villages						2FE new primary in Birchington and/or Westgate on Sea
Westgate-on-Sea						2FE new primary in Birchington and/or Westgate on Sea
Thanet Non-Selective	Up to 1FE temporary places	Up to 1FE temporary places	Up to 1FE temporary places	Up to 0.5FE temporary places	Up to 2FE temporary places	
Specialist Resourced Provision		30 place Secondary SRP for ASD				

## 7.11. Tonbridge and Malling

### Borough commentary

- The birth rate for Tonbridge and Malling dropped from 2018 to 2020, before increasing slightly in 2021 and then falling sharply in 2022 and 2023. The number of births also increased in 2021, before falling back in 2022 and the dropping significantly in 2023 to 1253 births which is the lowest since 2013.
- We forecast sufficient primary school places across the Borough to meet demand across the Plan period. However, there is local place pressures within some planning groups which will need to be addressed. Within the Non-Selective secondary planning groups, we anticipate sufficient places during the Plan period, apart from a small deficit in 2026-27 within the Sevenoaks and Borough Green Non-Selective. The West Kent Selective planning group as has small deficits forecast for the Plan period.
- On 13 July 2021, Tonbridge and Malling Borough Council withdrew their proposed Local Plan from public examination. The Borough Council expects to submit a revised plan to the Secretary of State 2025. The forecasts within the Kent Commissioning Plan incorporate consented housing proposals and remaining sites to be built out from the current Core Strategy. Any housing proposals from emerging Local Plans are not incorporated within the forecasts.

## Map of the Tonbridge and Malling Primary Planning Groups



### Tonbridge and Malling Primary Schools by Planning Group

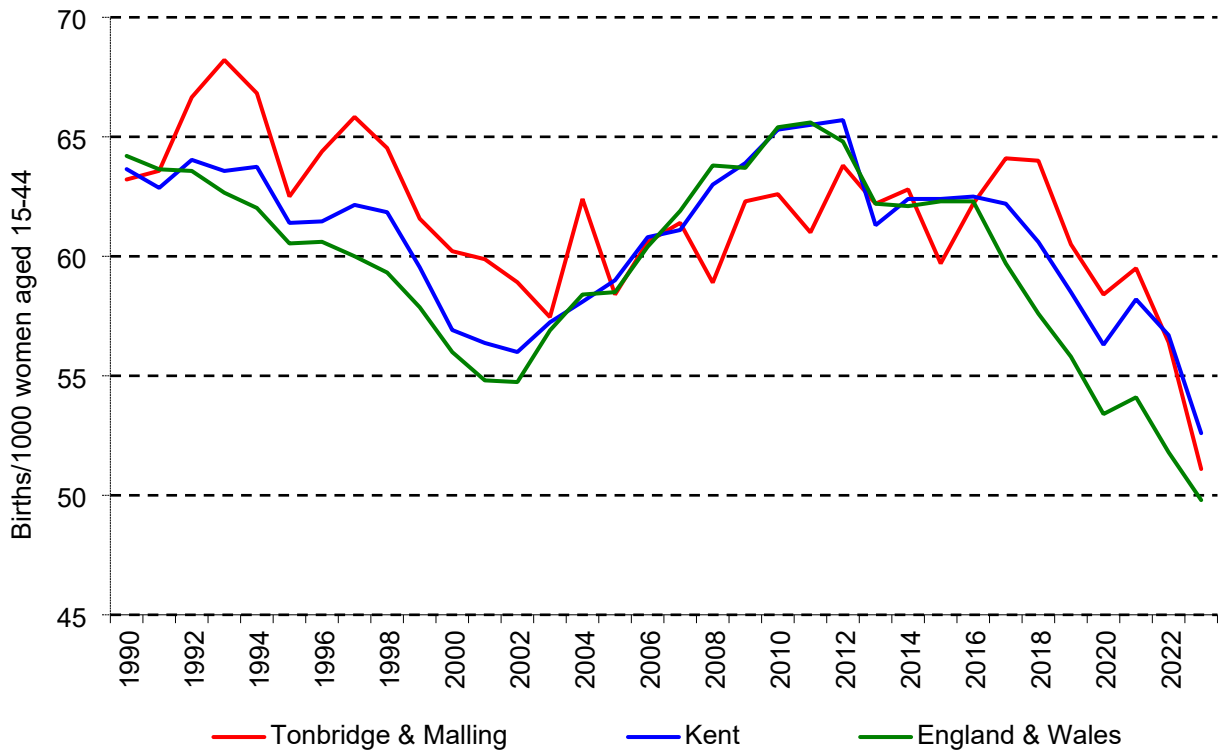
Planning Groups	School	Status
Tonbridge South	Bishop Chavasse CE Primary School	Free
	Royal Rise Primary School	Academy
	Slade Primary School	Community
	Sussex Road Community Primary School	Community
Tonbridge North and Hildenborough	Cage Green Primary School	Academy
	Hildenborough CE Primary School	Voluntary Controlled
	Long Mead Community Primary School	Community
	St. Margaret Clitherow RC Primary School	Academy
	Stocks Green Primary School	Community
Hadlow and East Peckham	East Peckham Primary School	Community
	Hadlow Primary School	Community
Shipbourne and Plaxtol	Plaxtol Primary School	Community
	Shipbourne School	Community
Kings Hill	Discovery School	Community
	Kings Hill School	Community
	Mereworth Community Primary School	Community
	Valley Invicta Primary School at Kings Hill	Academy

Planning Groups	School	Status
	Wateringbury CE Primary School	Voluntary Aided
Borough Green and Wrotham	Borough Green Primary School	Foundation
	Ightham Primary School	Community
	Platt CE Primary School	Voluntary Aided
	St. George's CE Primary School (Wrotham)	Voluntary Controlled
West Malling	More Park RC Primary School	Academy
	Offham Primary School	Community
	Ryarsh Primary School	Community
	Trottiscliffe CE Primary School	Voluntary Controlled
	Valley Invicta Primary School at Leybourne Chase	Academy
	West Malling CE Primary School	Academy
East Malling	Brookfield Infant School	Community
	Brookfield Junior School	Community
	Ditton CE Junior School	Voluntary Aided
	Ditton Infant School	Foundation
	Leybourne St. Peter and St. Paul CE Primary School	Voluntary Aided
	Lunsford Primary School	Community
	St. James the Great Academy	Academy
	St. Peter's CE Primary School (Aylesford)	Voluntary Controlled
	Valley Invicta Primary School at Aylesford	Academy
Snodland	Snodland CE Primary School	Voluntary Aided
	St. Katherine's School (Snodland)	Academy
	Valley Invicta Primary School at Holborough Lakes	Academy
Medway Gap	Burham CE Primary School	Voluntary Controlled
	St. Mark's CE Primary School (Eccles)	Academy
	Tunbury Primary School	Community
	Wouldham All Saint's CE Primary School	Voluntary Controlled

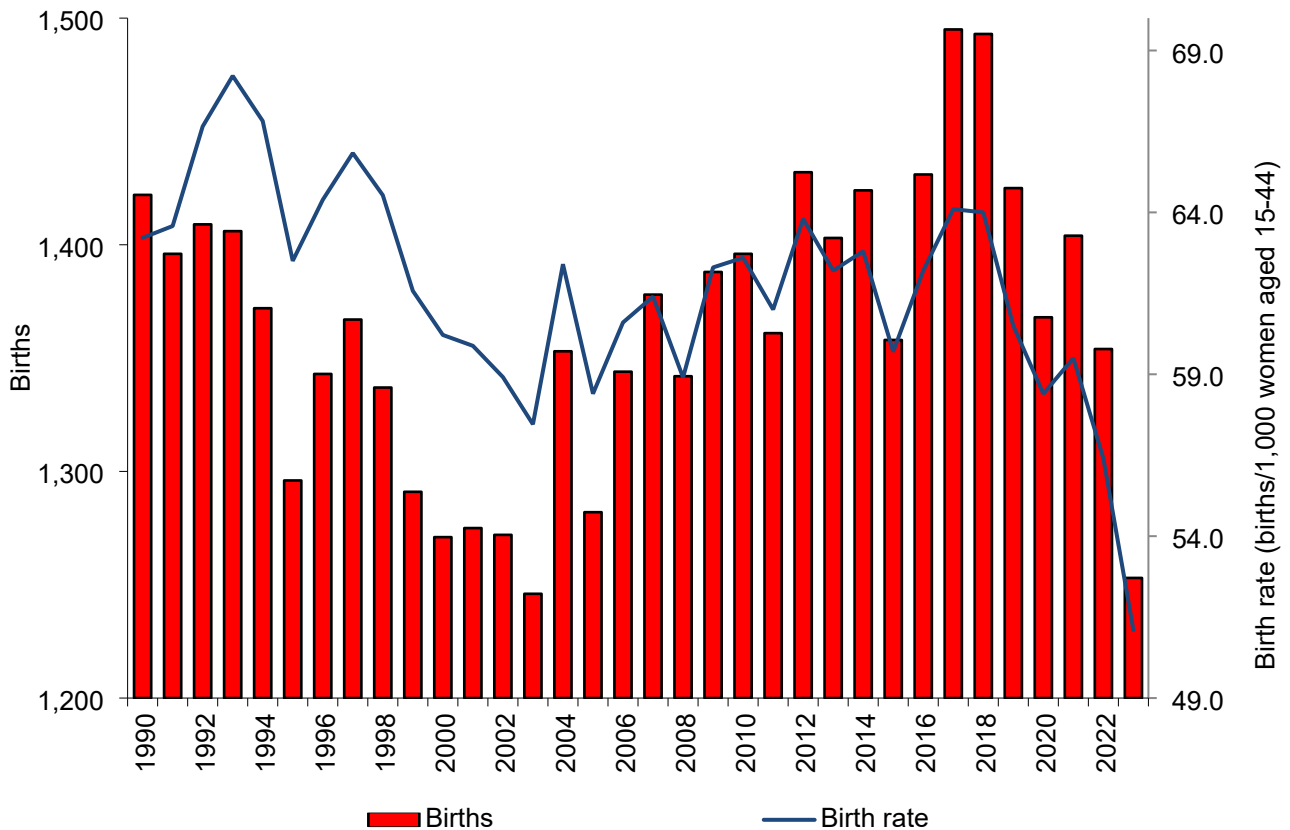
## Birth Rate and Births Analysis

The charts below set out the birth rates for the Borough and the number of recorded births.

### Tonbridge & Malling, Kent and England & Wales birth rates 1990-2023



### Tonbridge & Malling births and birth rate 1990-2023



## Tonbridge and Malling Analysis – Primary

### Primary - Year R Surplus/Deficit Capacity if No Further Action is Taken

Planning Group name	2023-24 capacity	2023-24 (A)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-34 (F)	2033-34 capacity
Tonbridge South	210	37	36	23	25	52	53	53	54	55	57	59	210
Tonbridge North and Hildenborough	270	71	68	57	64	63	64	65	66	67	69	71	255
Hadlow and East Peckham	60	9	14	4	14	8	9	9	9	10	11	13	60
Shipbourne and Plaxtol	23	8	9	4	7	6	6	7	7	7	7	7	24
Kings Hill	240	24	40	13	35	39	40	39	38	38	38	37	240
Borough Green and Wrotham	135	11	32	12	21	42	41	40	39	39	39	38	135
West Malling	162	18	10	11	-6	21	17	12	8	5	1	-2	162
East Malling	294	35	22	42	36	36	31	26	26	27	28	30	294
Snodland	180	25	-4	8	7	5	5	4	3	2	2	2	150
Medway Gap	198	49	25	16	3	-11	-14	-18	-20	-23	-24	-25	198
<b>Tonbridge &amp; Malling</b>	<b>1,772</b>	<b>287</b>	<b>252</b>	<b>191</b>	<b>203</b>	<b>260</b>	<b>252</b>	<b>237</b>	<b>230</b>	<b>227</b>	<b>228</b>	<b>229</b>	<b>1,728</b>

### Secondary - Year 7 Surplus/Deficit Capacity if No Further Action is Taken

Planning Group name	2023-24 capacity	2023-24 (A)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-34 (F)	2033-34 capacity
Malling Non-Selective	543	43	44	61	67	17	36	33	59	40	64	55	543
Sevenoaks and Borough Green Non-Selective	610	-25	-31	22	-15	11	5	13	16	59	11	32	630
Tonbridge and Tunbridge Wells Non-Selective	1,584	64	116	154	63	92	55	34	124	104	81	109	1,612
West Kent Selective	1,270	-23	-33	19	-46	-20	-29	-12	37	61	51	71	1,264

## **Primary District Commentary**

For primary education, the overall forecasts indicate sufficient places to meet demand across the Plan period. However, there are local place pressures within the some of the individual planning groups.

### **West Malling Planning Group**

Forecasts for West Malling show a small deficit in 2026-27 that can be accommodated in the adjacent Kings Hill planning group.

### **Medway Gap Planning Group**

The planning group is forecast to have a deficit from 2027-28 that increases throughout the Plan period. Where the demand in the short to medium term cannot be accommodated in neighbouring planning groups, we will work with local schools to establish bulge provision before seeking a more permanent solution via the expansion of an existing school towards the end of the forecast period. The demand for school places within this group can be impacted by children resident in Medway, we will work with Medway Council when determining the most appropriate commissioning strategy for ensuring all children have a school place.

## **Secondary District Commentary**

There are four planning groups which are within Tonbridge and Malling Borough or which cross the Borough boundary (See appendix 12.2 for the non-selective and selective planning group maps). Three of which are non-selective. The commentary below outlines the forecast position for each of the planning groups.

### **Malling Non-Selective Planning Group**

There are three schools in the planning group: Aylesford School, Holmesdale School and Malling School. Forecasts indicate that there will be sufficient Year 7 places across the Plan period.

### **Sevenoaks and Borough Green Non-Selective Planning Group**

There are three schools in the Sevenoaks and Borough Green non-selective planning group: Knowle Academy, Wrotham School and Trinity School.

The forecast indicates a 15 place deficit in 2026-27, before then showing surpluses for the remainder of the Plan period. We anticipate that the adjacent Tonbridge and Tunbridge Wells planning group will provide places for this deficit, however we will also work with existing schools to offer bulge provision of up to 30 places to meet the deficit in 2026-27 if required.

### **Tonbridge and Tunbridge Wells Non-Selective Planning Group**

There are eight schools in the planning group: Hadlow Rural Community School, Hayesbrook School, Hillview School for Girls, Hugh Christie Technology College, Bennett Memorial Diocesan School, Mascalls Academy, Skinners' Kent Academy and St. Gregory's Catholic School.

Forecasts indicate that there will be sufficient Year 7 places across the Plan period. It should be noted that these forecasts do not incorporate the impact of housing growth associated with unconsented or unallocated development outside of an adopted Local Plan, therefore future strategic housing growth may have a significant impact over and above the forecast need.

### **West Kent Selective Planning Group**

There are six schools in the planning group: Judd School, Tonbridge Grammar School, Weald of Kent Grammar School, Skinners' School, Tunbridge Wells Girls' Grammar School and Tunbridge Wells Grammar School for Boys.



The forecast indicates that there will be fluctuating deficits through to 2030-31 when there is a forecast surplus. We anticipate that these forecast deficits will be met through commissioned bulge provision in existing schools where necessary or own admission authorities offering over their PAN. We will keep the need for additional permanent capacity under review.

### Planned Commissioning – Tonbridge and Malling

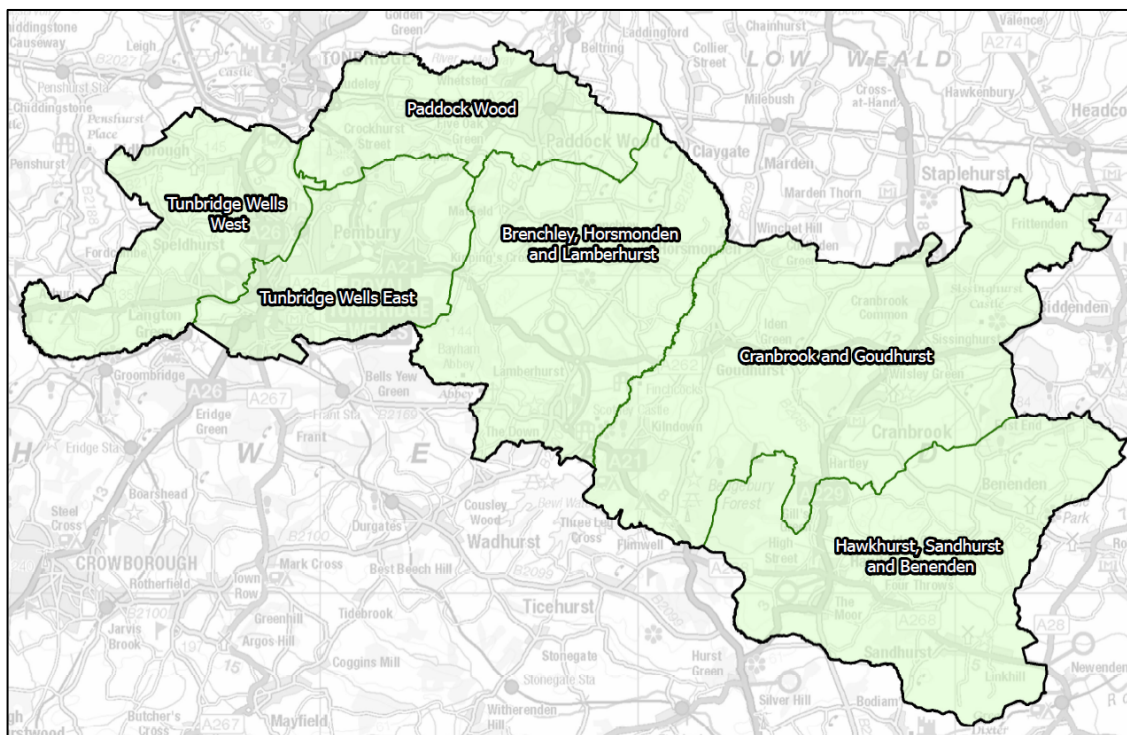
Planning Group	By 2025-26	By 2026-27	By 2027-28	By 2028-29	Between 2029-32	Post 2032
Medway Gap					1FE Expansion of Existing School	
West Kent Selective		Up to 60 temporary places	Up to 30 temporary places	Up to 30 temporary places		
Specialist Schools			50 place Satellite of a PSCN School			

## 7.12. Tunbridge Wells

### Borough Commentary

- The birth rate for Tunbridge Wells has in general been falling since 2010 and continued to drop in 2023. However the rate is still above both the county and national averages. The number of recorded births has followed a similar trend to a low of 1068 in 2023, which is the lowest for more than 20 years.
- We forecast sufficient primary school places across the Borough throughout the Plan period albeit there is local place pressure within the Cranbrook and Goudhurst, the Brenchley, Horsmonden and Lamberhurst and the Paddock Wood planning groups. Within the secondary sector, we anticipate there will be sufficient places during the Plan period within the Tonbridge and Tunbridge Wells Non-Selective and the Cranbrook Selective groups. The West Kent Selective planning group as has small deficits forecast for the Plan period.
- Consultation took place on Issues and Options for the new Local Plan in 2017 and on a Draft Local Plan in autumn 2019, a final proposed Local Plan is now undergoing independent examination. The assessed housing need for the Borough is 678 dwellings per annum, equivalent to some 12,200 additional homes over the plan period to 2038. We will continue working with the Borough Council to ensure sufficient education provision is provided for future housing growth. During the 5 year period 2015-16 to 2019-20 a total of 2473 houses were completed with an average of 494.6 per year, which is below the required average based on objectively assesses hosing need.

## Map of the Tunbridge Wells Primary Planning Groups



## Tunbridge Wells Primary Schools by Planning Group

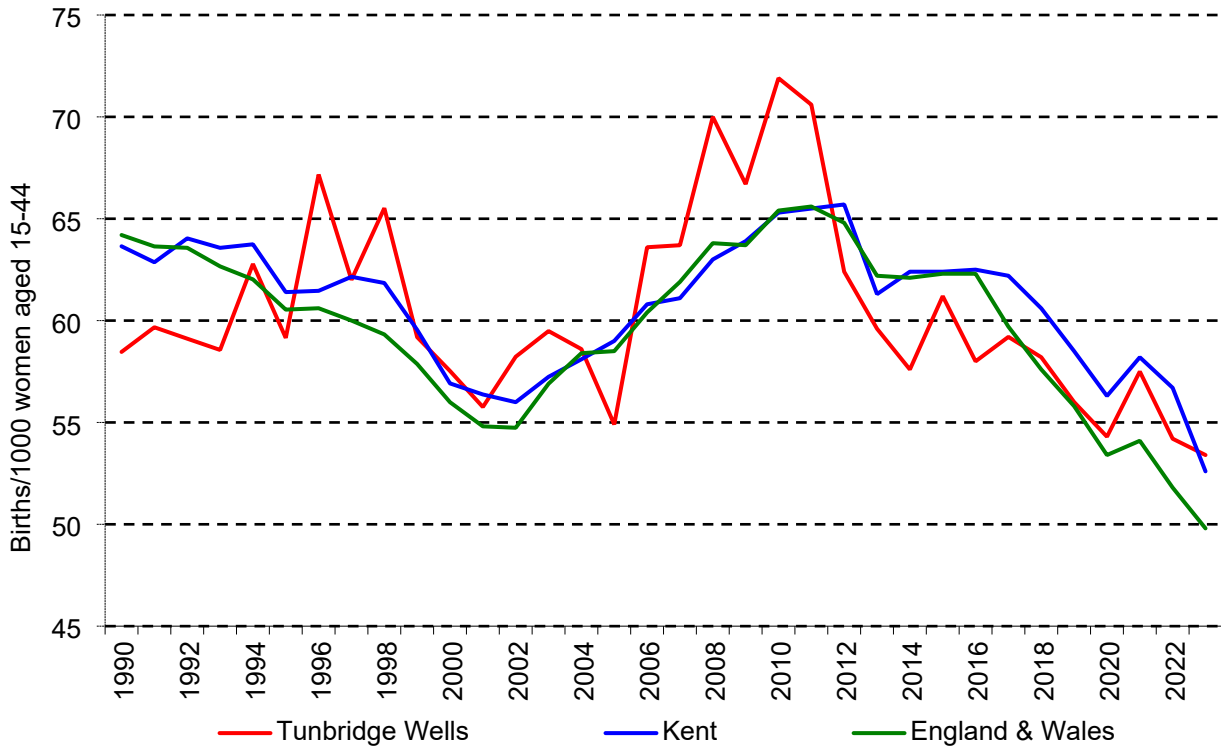
Planning Groups	School	Status
Tunbridge Wells East	Broadwater Down Primary School	Community
	Claremont Primary School	Community
	Pembury School	Community
	Skinners' Kent Primary School	Academy
	St. Barnabas CE Primary School	Voluntary Aided
	St. James' CE Primary School	Voluntary Aided
	St. Mark's CE Primary School (Tunbridge Wells)	Voluntary Controlled
	St. Peter's CE Primary School (Tunbridge Wells)	Voluntary Controlled
	Temple Grove Academy	Academy
	Wells Free School	Free
Tunbridge Wells West	Bidborough CE Primary School	Voluntary Controlled
	Bishops Down Primary School	Community
	Langton Green Primary School	Community
	Rusthall St. Paul's CE Primary School	Voluntary Aided
	Southborough CE Primary School	Voluntary Controlled
	Speldhurst CE Primary School	Voluntary Aided
	St. Augustine's RC Primary School (Tunbridge Wells)	Academy
	St. John's CE Primary School (Tunbridge Wells)	Voluntary Controlled
St. Matthew's High Brooms CE Primary School	Voluntary Controlled	
Paddock Wood	Capel Primary School	Community
	Paddock Wood Primary School	Academy
Branchley, Horsmonden and Lamberhurst	Branchley and Matfield CE Primary School	Academy
	Horsmonden Primary School	Academy
	Lamberhurst St. Mary's CE Primary School	Voluntary Controlled
Cranbrook and Goudhurst	Colliers Green CE Primary School	Voluntary Aided
	Cranbrook CE Primary School	Voluntary Controlled

Planning Groups	School	Status
	Frittenden CE Primary School	Voluntary Controlled
	Goudhurst and Kilndown CE Primary School	Voluntary Controlled
	Sissinghurst CE Primary School	Voluntary Aided
Hawkhurst, Sandhurst and Benenden	Benenden CE Primary School	Voluntary Controlled
	Hawkhurst CE Primary School	Voluntary Controlled
	Sandhurst Primary School	Community

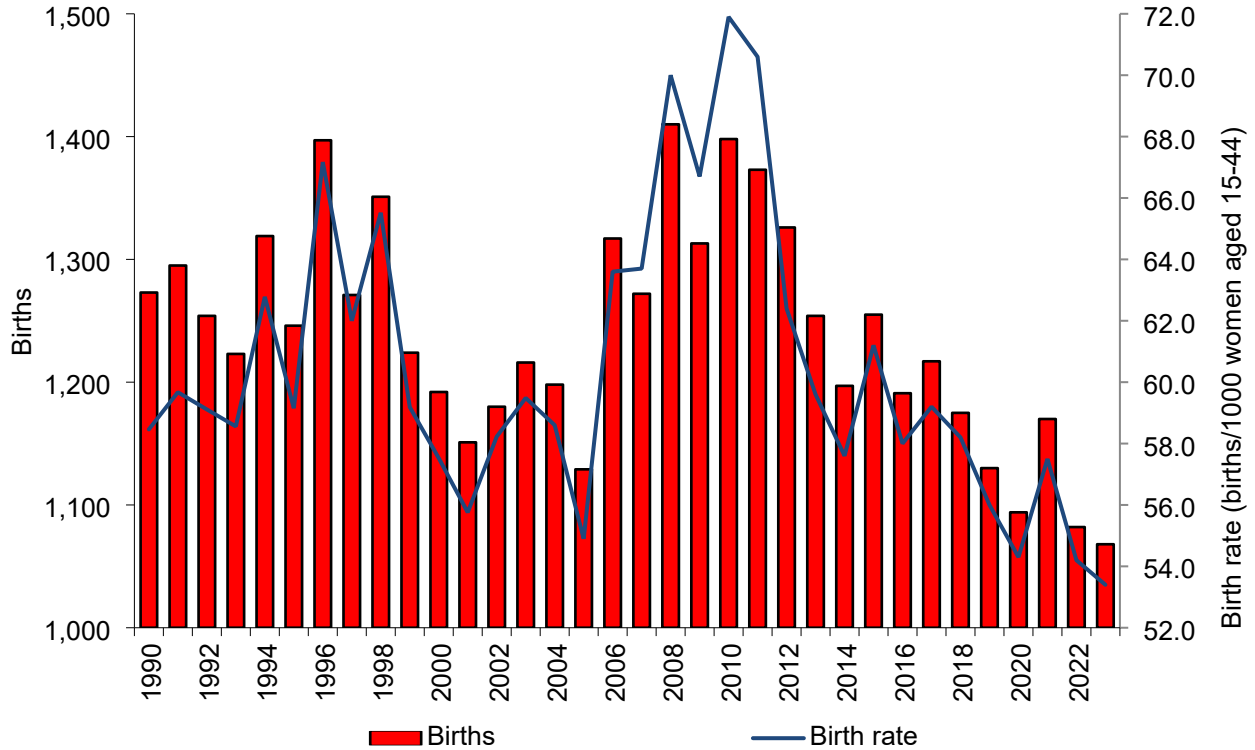
## Birth Rate Analysis

The charts below set out the birth rates for the Borough and the number of recorded births.

### Tunbridge Wells, Kent and England & Wales birth rates 1990-2023



### Tunbridge Wells births and birth rate 1990-2023



## Tunbridge Wells Forecasts

### Primary - Year R Surplus/Deficit Capacity if No Further Action is Taken

Planning Group name	2023-24 capacity	2023-24 (A)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-34 (F)	2033-34 capacity
Tunbridge Wells East	450	60	92	97	112	119	120	120	120	119	119	117	450
Tunbridge Wells West	435	37	-2	53	56	93	95	96	97	98	100	101	450
Paddock Wood	120	4	-19	-16	-21	-38	-39	-40	-41	-43	-43	-44	120
Brenchley, Horsmonden and Lamberhurst	90	1	5	-7	-14	-6	-6	-6	-5	-5	-4	-4	90
Cranbrook and Goudhurst	111	-6	7	-6	-11	-9	-9	-9	-9	-8	-7	-6	121
Hawkhurst, Sandhurst and Benenden	90	3	6	4	6	7	8	10	11	12	13	15	90
<b>Tunbridge Wells</b>	<b>1,296</b>	<b>99</b>	<b>89</b>	<b>126</b>	<b>129</b>	<b>166</b>	<b>170</b>	<b>171</b>	<b>172</b>	<b>174</b>	<b>177</b>	<b>180</b>	<b>1,321</b>

### Secondary - Year 7 Surplus/Deficit Capacity if No Further Action is Taken

Planning Group name	2023-24 capacity	2023-24 (A)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-34 (F)	2033-34 capacity
Tenterden and Cranbrook Non-Selective	360	73	73	58	42	36	31	25	40	24	22	27	360
Tonbridge and Tunbridge Wells Non-Selective	1,584	64	116	154	63	92	55	34	124	104	81	109	1,612
Cranbrook Selective	90	-1	20	23	18	8	10	9	7	9	0	0	90
West Kent Selective	1,270	-23	-33	19	-46	-20	-29	-12	37	61	51	71	1,264

## **Primary District Commentary**

For primary education the overall forecasts indicate sufficient places to meet demand across the Plan period for Year R and all primary years. There is local place pressure within the Paddock Wood, the Brenchley, Horsmonden and Lamberhurst and the Cranbrook and Goudhurst planning groups

The Year R surplus in Tunbridge Wells town (Tunbridge Wells East and West planning groups) is forecast to be in excess of 20% during the Plan period; depending on the distribution of this surplus between schools it may necessitate adjustment to the PANs of individual schools in order to ensure class sizes remain financially viable.

### **Paddock Wood Planning Group**

The planning group is forecast to have deficits that increase throughout the Plan period. We will monitor the situation but anticipate that the deficits will be accommodated in the neighbouring planning groups or within one of the small schools within the planning group offering over PAN for the first 2 years of the Plan period. However, the demand of more than 1 FE is forecast from 2027-28. To meet this demand we will seek to establish a new primary school within the town.

### **Brenchley, Horsmonden and Lamberhurst Planning Group**

The planning group is forecast to small deficits across the Plan period. We will monitor the situation but anticipate that the deficits will be accommodated in the neighbouring planning groups or within one of the small schools within the planning group offering over PAN.

### **Cranbrook and Goudhurst Planning Group**

Forecasts indicate deficits throughout the Plan period. We will seek to provide sufficient capacity within the planning group through additional temporary provision in those schools with a PAN of less than 1FE from during the initial years of the Plan period. The forecast ongoing deficit is less than 1FE; careful consideration of any detriment to existing schools will be given prior to a permanent commissioning strategy being adopted.

## **Secondary District Commentary**

There are four planning groups which are within Tunbridge Wells Borough or which cross the Borough boundary, two non-selective and two selective (See appendix 12.2 for the non-selective and selective planning group maps). The commentary below outlines the forecast position for each of the planning groups.

### **Tenterden and Cranbrook Non-Selective Planning Group**

Following a substantive decision by the Secretary of State for Education to close High Weald Academy on 31 August 2022, this is a single school planning group containing Homewood School and Sixth Form Centre. There is forecast to be sufficient places in this planning group throughout the plan period.

### **Tonbridge and Tunbridge Wells Non-Selective Planning Group**

There are eight schools in the planning group: Hadlow Rural Community School, Hayesbrook School, Hillview School for Girls, Hugh Christie Technology College, Bennett Memorial Diocesan School, Mascalls Academy, Skinners' Kent Academy and St. Gregory's Catholic School.

Forecasts indicate that there will be sufficient Year 7 places across the Plan period. It should be noted that these forecasts do not incorporate the impact of housing growth associated with unconsented or unallocated development outside of an adopted Local Plan, therefore future

strategic housing growth may have a significant impact over and above the forecast need.

### **Cranbrook Selective Planning Group**

There is only one school in the Cranbrook selective planning group: Cranbrook School. We forecast sufficient Year 7 and Years 7-11 places throughout the Plan period.

### **West Kent Selective Planning Group**

There are six schools in the planning group: Judd School, Tonbridge Grammar School, Weald of Kent Grammar School, Skinners' School, Tunbridge Wells Girls' Grammar School and Tunbridge Wells Grammar School for Boys.

The forecast indicates that there will be fluctuating deficits through to 2030-31 when there is a forecast surplus. We anticipate that these forecast deficits will be met through commissioned bulge provision in existing schools where necessary or own admission authorities offering over their PAN. We will keep the need for additional permanent capacity under review.

### **Planned Commissioning – Tunbridge Wells**

<b>Planning Group</b>	<b>By 2025-26</b>	<b>By 2026-27</b>	<b>By 2027-28</b>	<b>By 2028-29</b>	<b>Between 2029-32</b>	<b>Post 2032</b>
<b>Cranbrook and Goudhurst Planning Group</b>	Up to 10 temporary places	Up to 10 temporary places	Up to 10 temporary places	1 FE permanent expansion of existing school		
<b>Paddock Wood</b>			1FE Through Establishment of New Primary School			
<b>West Kent Selective</b>		Up to 60 temporary places	Up to 30 temporary places	Up to 30 temporary places		
<b>Special Schools</b>						



## 8. Commissioning Special Educational Needs

### 8.1 Duties to Provide for Special Educational Needs and Disabilities (SEND)

The Children and Families Act 2014 sets out the responsibility to improve services, life chances and choices for vulnerable children and to support families. The Act extends the SEND system from birth to 25, where appropriate, giving children, young people and their parents/carers greater control and choice in decisions and ensuring needs are properly met.

The Equality Act 2010 and Part 3 of the Children and Families Act 2014 interact in several important ways. They share a common focus on removing barriers to learning. In the Children and Families Act 2014 duties for planning, commissioning, and reviewing provision, the Local Offer and the duties requiring different agencies to work together apply to all children and young people with Special Education Needs (SEN) or disabilities. The Code of Practice 2015 which applies to England, explains the duties of local authorities, health bodies, schools and colleges to provide for those with special educational needs under part 3 of the Children and Families Act 2014.

### 8.2 Kent Overview

Kent has a significantly large number of pupils with an Education Health & Care Plan (EHCP). We remain an outlier nationally with a rate of growth in EHCPs well above national averages per 10,000 children. The number of EHCPs in January 2024 was 19,407.

Kent has proportionately:

- fewer children identified as requiring SEN support in mainstream schools when compared to the national average.
- fewer children with EHCPs educated in our mainstream schools compared to national and statistical neighbour averages.
- more children placed in either maintained special or independent special schools or Specialist Resource Provisions than national and statistical neighbour averages.

Kent is now part of the DfE Safety Valve programme. The programme aims to support Local Authorities to reform their High Needs systems and SEND services for children and young people while ensuring services are sustainable.

Whilst we acknowledge that Special Schools play an important role in the continuum of education provision in Kent, we also need to focus on developing the role of mainstream schools, including SRPs, to successfully support more complex children and young people with SEND.

KCC produces an annual SEND Sufficiency Plan for children and young people. In addition, the reviews of Special Schools, Specialist Resource Provisions and Early Years Provision will contribute to a revised SEND Strategy, setting out the direction for the next five years. The outcomes from these reviews and further work to inform KCC's approach to supporting children and young people with Social, Emotional and Mental Health (SEMH) needs, aligned with the approach to Alternative Provision across all twelve of Kent's districts, will inform the revision of the new SEND Sufficiency Plan.

The SEND Sufficiency Plan sits under the Commissioning Plan for Education Provision in Kent to inform strategic educational place planning. The purpose of the SEND Sufficiency Plan is to inform and support the Local Authority in its development of strategic place planning for SEND educational provision in the medium to long term. There are four key aims for the Sufficiency Plan.

- Inform medium to longer term commissioning/decommissioning of places for children and young people with an EHCP.
- Inform capital investment planning and future bids to DfE Wave programmes.
- Inform high level discussions with providers around required changes to current provision.
- Support the delivery of the Safety Valve programme, bringing Kent in-line with other local authorities' patterns of provision.

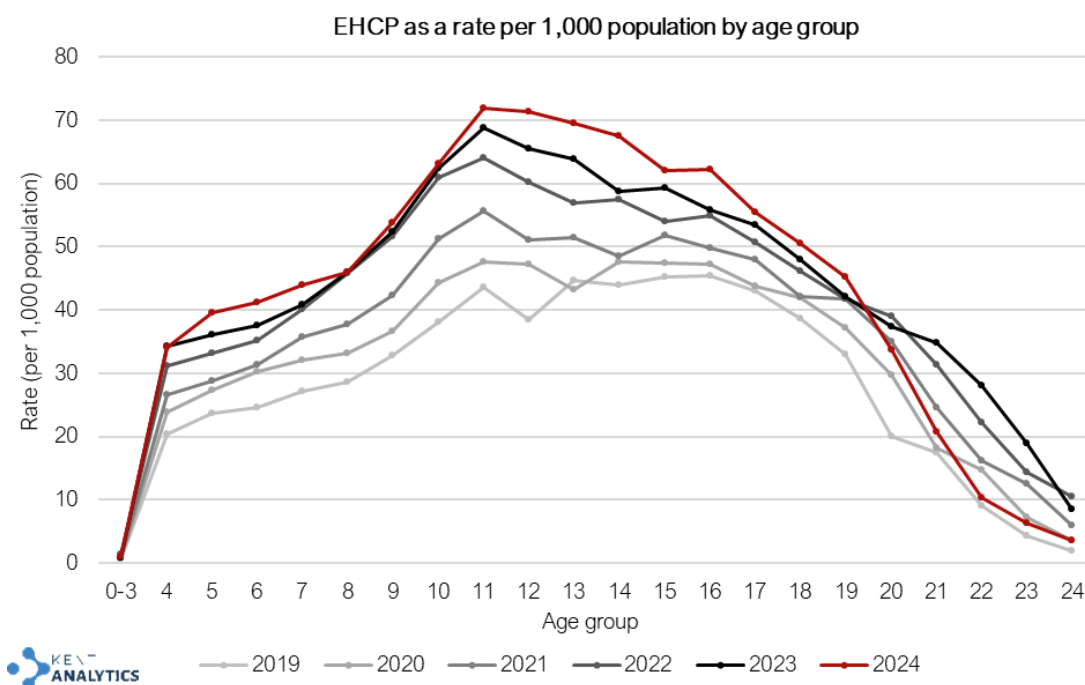
### 8.3 Education Health and Care Plans

The Local Authority is responsible for issuing and maintaining EHCPs for children and young people between the ages of 0-25 years. As of January 2024, this totalled 19,407 children and young people with an EHCP in Kent. This is an increase of 477 (2.5%) since January 2023. In England, the number of children and young people with EHCPs increased to 575,963 in January 2024, up by 11% from 2023. The number of EHCPs have increased each year since 2010<sup>2</sup>

### 8.4 Age Groups

Figure 9a shows the rate of children and young people with an EHCP per 1,000 population for the past 6 years. It shows that the proportion of the population aged 4 to 25 years with an EHCP continues to increase year on year.

**Figure 9a: Children and Young People with EHCPs rate with per 1,000 population 2019-2024 to update from Forecast**

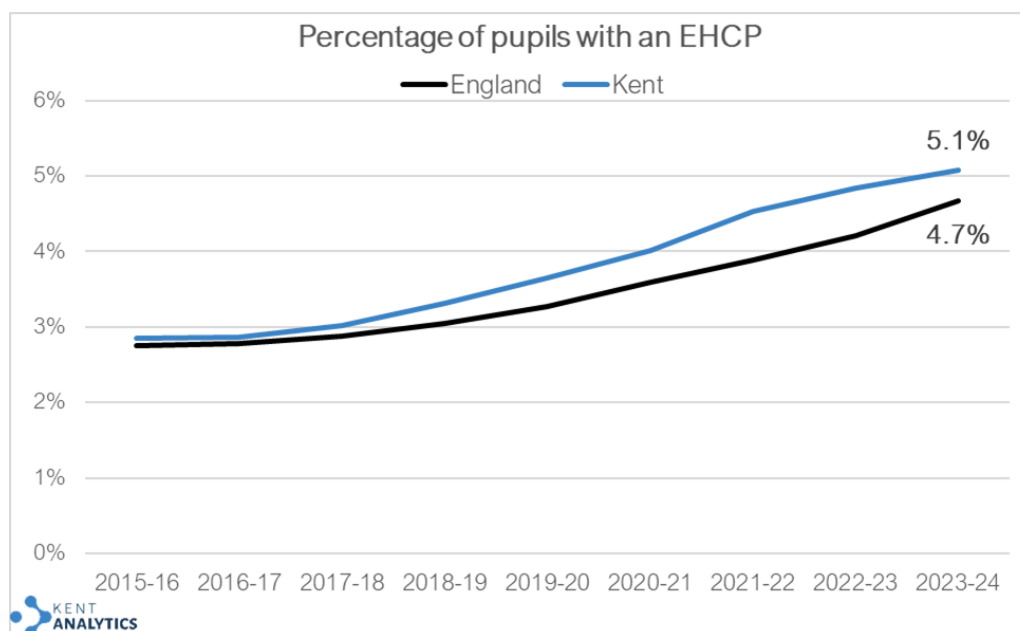


<sup>2</sup> [Education, health and care plans, Reporting year 2023 – Explore education statistics – GOV.UK \(explore-education-statistics.service.gov.uk\)](https://www.gov.uk/explore-education-statistics/service/gov.uk)

## 8.5 School Aged Pupils

Figure 9b shows the percentage of pupils in schools in Kent and England that have an EHCP. Kent has 5.1% of pupils compared to 4.7% for England. Whilst the rate of growth has increased nationally, Kent's increase started much earlier (2015) and has continued to increase at a greater rate.

**Figure 9b: Percentage of pupils with an EHCP in Kent compared with England 2015 – 2024**



## 8.6 SEN Need Types

Figure 9c shows that Autistic Spectrum Disorder (ASD) remains the most common primary need type with 44.5% of children and young people with an EHCP (0-25 years) having ASD identified as their primary need. This is an increase from 42.3% in January 2023. The second highest is SEMH at 19.3%, a decrease from 20.4% in January 2023, followed by 17.3% of children and young people with Speech, Language and Communication Needs (SLCN) identified as their EHCP primary need.

**Figure 9c: EHCPs by age group and need type January 2024**

SEN Need Type 2024	Under 5	Aged 5-10	Aged 11-15	Aged 16-19	Aged 20-25	Total	%
Autistic Spectrum Disorder	348	2699	3273	1806	509	8,635	44.5%
Hearing Impairment	9	58	63	46	16	192	1.0%
Moderate Learning Difficulty	21	249	475	242	99	1,086	5.6%
Multi-Sensory Impairment	2	6	8	5	1	22	0.1%
Not recorded on system	9	21	14	11	3	58	0.3%
Other difficulty/disability	0	1	0	0	0	1	0.0%
Physical Disability	29	206	190	153	53	631	3.3%
Profound and Multiple Learning Difficulty	16	139	126	79	22	382	2.0%
Severe Learning Difficulty	19	214	307	215	99	850	4.4%
Social, Emotional and Mental Health	5	624	1706	1165	238	3,738	19.3%
Specific Learning Difficulty	1	49	191	91	28	360	1.9%
Speech, Language and Communication Needs	212	1495	1063	433	156	3,359	17.3%
Visual Impairment	2	37	29	21	4	93	0.5%
<b>Kent Total</b>	<b>673</b>	<b>5,798</b>	<b>7,445</b>	<b>4,267</b>	<b>1,224</b>	<b>19,407</b>	

Source SEN2 Return January 2024

## 8.7 Provision

Figure 9d shows the number of EHCPs by establishment type (0-25 year olds.) In 2024, 34.8% of children and young people in Kent (34% in 2023) are educated in mainstream schools (including SRPs), whilst the national figure is 43.1%. In Kent, 40.4% of children and young people with EHCPs are educated in a special school (including independent schools) compared to 32.1% nationally.

To ensure the LA is able to provide sustainable high quality provision, the system needs to be realigned and the proportion of children and young people catered for within each provision type brought in line with national figures, so that specialist places are only for those children and young people with the most complex needs. A significant change programme is ongoing to improve mainstream school SEND inclusion capacity so staff are skilled, confident and able to educate and support more children with EHCPs. This realignment will be supported by the inclusive practices within Kent's Countywide Approach to Inclusive Education (CATIE) and will ensure a greater proportion of Kent's children and young people will be supported and achieve their full potential in mainstream schools closer to their homes.

Kent has 24 special schools. These include 21 Local Authority maintained special schools, 1 special academy and 2 Free Schools. In 2024, 96% of Kent's special schools were graded as good or outstanding by Ofsted. There are 18 special schools that are all-through schools (primary and secondary aged). There are 17 special schools offering post-16 placements.

For the academic year 2024-25 Kent has commissioned 6,282 places in Kent special schools, an increase of 314. Of the total places, 890 are places for post-16 pupils. The current total designated number across Kent special schools as of September 2022 was 5,483. Kent also has 74 Specialist Resource Provisions attached to 65 mainstream schools. Each provision has a designation for SEN and eight schools have more than one SRP or an SRP with multiple designations. A total of 1430 SRP places, including 20 places for post-16 pupils, have been commissioned for September 2024, with no increase of places from September 2023.

Where we are unable to provide a specialist school placement in a Kent maintained special school or SRP, placements are commissioned in the independent and non-maintained sector. As of January 2024, 1,648 Kent resident pupils had funded places in an independent non-maintained school, an increase of 59 places from January 2023 and representing 8.5% of all EHCPs. To meet the need for specialist places across Kent, including meeting the needs in areas of population growth, a mixture of new special schools, expansions of existing schools and the establishment of satellites and SRPs will be commissioned across Kent. This plan only reflects a proportion of our commissioning intentions as the full plan will need to be informed by the review of our continuum of SEND provision, to be reported in the first half of 2025.

**Figure 9d: EHCPs by establishment type January 2024 (0-25 year olds)**

Type of Establishment	Number	Kent %	England %
Mainstream school including SRPs	6,754	34.8%	43.1%
Special school inc. independent.	7,869	40.4%	32.1%
Non-maintained early years	67	0.3%	0.8%
Further education	2,634	13.6%	14.5%
NEET	553	2.8%	2.7%
Educated elsewhere	820	4.2%	3.7%
Alternative provision/Pupil referral unit	9	0.0%	0.8%
Other	321	1.7%	0.7%
Unknown	380	2.0%	1.2%
<b>Total</b>	<b>19,407</b>		

Source: <https://explore-education-statistics.service.gov.uk/find-statistics/education-health-and-care-plans>

## 8.8 Post 16 SEN provision

Most young people with SEND will complete their education alongside their peers by 18. However, some young people will require longer to complete and consolidate their education and training, and the length of time will vary for each young person.

The Children and Families Act 2014 extended the special educational needs system to young people up to the age of 25. Consequently, since 2015 KCC has seen a large growth in the number of EHCPs for young people up to the age of 25.

We know the number of young people wanting to remain in education is growing. However, planning post-16 SEND provision is complex. KCC continues its work to establish a robust evidence base to resolve any gaps in provision. Remaining at their secondary school for sixth form is one of the choices that young people with SEND can make; 17 of Kent's maintained special schools have sixth form provisions.

Further Education (FE) College remains the most common type of provision attended across all the age groups of the post-16 cohort. However, Kent is below the national average for General and Tertiary College/HE placement, with 9.3% of placements compared to 11.6% nationally in 2024. FE Colleges provide a range of courses for 16 to 25 SEND learners and are the most popular form of education for this group. However, due to a range of issues, FE colleges are not suitable in the first instance for many SEND learners and a proportion of learners drop out of college in the first term.

SPIs provide an alternative to FE colleges, offering more bespoke learning environments often for learners with additional or more complex needs. In 2024, 829 young people attended an SPI in Kent which is 4.3% of the cohort. In comparison, 1.5% attended SPIs nationally. Of the SPIs in Kent in 2024, the majority have a contractual relationship with KCC. Growth in SPI provision to this point continues to be largely organic and provider led. To ensure we have full County coverage, we wish to work in partnership with prospective providers as there is the need for more targeted SPI provision in the County.

We continue to work with FE Colleges to ensure that we have good geographical coverage of the right courses at the right levels and that there are clear pathways and partnerships with alternate types of providers such as SPIs to meet the needs of learners with more complex needs or requiring a more bespoke package.

We expect that the number of EHCPs for young people over the age of 18 will continue to grow as the population bulge works its way through secondary school and into post-16, and without careful planning, demand could outstrip supply. To ensure sufficient quality post-16 SEND provision, we will continue to build on our present work to develop a 16 to 19 SEND Strategy. We want to explore new ways of working, including potential collaborations between partner agencies and organisations, which are service intelligence and data-driven; so, we get the right provision in the right area to meet need.

## 8.9 Future Commissioning of Provision

Evidence for our commissioning intentions is set out within KCC's SEND Sufficiency Plan. The Plan will inform changes and additional provision required from September 2025 and throughout the rest of the Plan period. Commissioning intentions for this Plan will be limited to new SEN schools and satellites where there is already a case based on population growth and current patterns of travel to special schools outside of the areas where children live. The Special School Review has worked with stakeholders to provide recommendations and is reporting to members.

Additional SRPs that have been committed to or form part of a new academy's funding agreement will be included. We will also look to address evidenced gaps in SRP provision in secondary schools, particularly as the school age population growth is currently moving through the secondary and post-16 age groups.

A total of 460 new special school places are forecast to be commissioned and 70 SRP places, some of which are already within the commissioning process. Additional SRP places may be commissioned following the completion of the SRP review which will identify need type and geographical gaps based on the role of SRPs within the provision of locality services for children and young people with SEND. Kent is currently undertaking area discussions with stakeholders to consider future SRP provision and commissioning. Figures 9i and 9j identify the number, need type and district of these places.

**Figure 9i: Agreed and planned additional specialist provision across Kent Specialist Schools**

Provision	Proposed opening date	Need Type	District	Potential Number of places	Total Planned Places added by year				
					2025-2026	2026-2027	2027-2028	2028-2029	Between 2029-32
Special School (all through) - Whitstable	2026	PSCN/ ASD/ SEMH	Canterbury	120	0	48	28	44	0
Special School (All through) - Swanley	2026	PSCN	Sevenoaks	250	0	114	66	70	0
Expansion of Special school for SEMH with ASD to include Primary provision or a primary satellite	2027	SEMH with ASD	Swale	40	0	0	10	10	20
Satellite of a PSCN School	2027	PSCN	Tonbridge and Malling	50	0	0	50	0	0
<b>Total Special School places</b>				<b>460</b>	<b>0</b>	<b>162</b>	<b>154</b>	<b>124</b>	<b>20</b>

**Figure 9j: Agreed and planned additional Specialist Resource Provisions**

Provision	Proposed opening date	Need Type	District	Potential Number of places	Total Planned Places added by year				
					2025-2026	2026-2027	2027-2028	2028-2029	Between 2029-32
Alkerden (Primary)	2026	ASD	Dartford	15	0	4	4	7	0
Alkerden (Secondary)	2026	ASD	Dartford	25	0	5	5	15	0
Secondary SRP	2026	ASD	Thanet	30	0	5	5	5	15
<b>Total SRP places</b>				<b>70</b>	<b>0</b>	<b>14</b>	<b>14</b>	<b>27</b>	<b>15</b>



## 9. Commissioning Early Years Education and Childcare

### 9.1 Legislative Context - Free Entitlements and new Wraparound Childcare

Early Education and Childcare is legislatively governed by the Childcare Acts of 2006 and 2016. These place a duty on all local authorities to improve outcomes for young children, to cut inequalities between them, to secure sufficient childcare, with adequate flexibility to allow parents to work via the following:

- 15 hours of early education for eligible two-year olds (the Two Year Old Entitlement, in Kent known as Free for Two)
- 15 hours of early education for working parents of all children aged 9 months and above
- The Universal Entitlement of 15 hours for all three and four-year olds
- 30 Hours of Free Childcare (the Extended Entitlement) for three and four-year olds of eligible working parents.

From September 2025 – 30 hours per week for working parents of all children aged 9 months and above.

In addition, KCC has commissioned The Education People to work with schools and private providers to increase the supply of wraparound childcare, so that all parents of primary school-aged children can access childcare from 8am to 6pm if they need it.

In September 2024, the Government announced it will provide capital funding to create or expand 3,000 on-site nurseries in primary schools either run by the school or in partnership with PVI (private, voluntary and independent) providers. Funding will be allocated to successful schools in Spring 2025 to support the first cohort of places.

The Government also announced plans to provide free breakfast club places in primary schools to build on the wraparound childcare programme supporting families with the cost of living and reducing the impact of poverty, by providing children with a free breakfast every morning. A pilot programme in 750 schools nationally has been announced with £7m funding for delivery in the summer term April-July 2025.

### 9.2 Early Education and Childcare Provision in Kent

Early Education and Childcare in Kent is available through a large, diverse and constantly shifting market of maintained, academies, private, voluntary and independent providers and childminders, all of which operate as individual businesses and are therefore subject to market forces.

The LA (in Kent as commissioned through The Education People) is required to work with providers in making available a sufficient range of flexible provision, in the right geographical areas, at the right times and offering the right sessions to fit with both standard and atypical working patterns.

The DfE has provided each local authority with information related to the expansion of funded early education and childcare entitlements and wraparound childcare, as announced in the Spring Budget of 2023. This information includes the DfE's analysis of the demand and supply of childcare places in Kent. The results of this analysis give an indicative view of the level of demand in Kent and is being used to support childcare sufficiency planning carried out by The Education People. This information is used to help plan for the roll-out of the new 30 hours childcare entitlement for working parents of 9 month to 36 month-olds.



### 9.3 Childcare Sufficiency Assessment

The annual Childcare Sufficiency Assessment (CSA) shows the supply of, and demand for, early years and childcare provision across the County, including where there might be over supply and particularly a deficit in provision. The Education People’s Early Years and Childcare Service works with providers and potential providers to encourage the establishment of additional provision where it is required.

The CSA for the 2024-2025 academic year is based on the DfE analysis for childcare places needed for 9 month to 36 month-olds combined with the supply and demand for childcare for 3 and 4 year olds in the Summer Term 2024 when demand for the take up and supply of childcare is greatest.

### 9.4 Sufficiency of Childcare Places for Children Aged 0-4 Years Old

Traditionally, the assessment of sufficiency is calculated by comparing the total available childcare supply of places with the forecast number of eligible children in each age group living within in each planning area and district. The DfE’s analysis uses other research and knowledge of each district to determine how many extra childcare places are needed. The level of rurality of the district, reflecting the greater ease of travel across smaller urban areas, is used to decide the degree to which a surplus of childcare places can offset a deficit. Figure 10a models the anticipated childcare places needed for 9 month to 36 month-olds in the 2024/2025 academic year.

To aid planning for the entitlement increasing to 30 hours per week for working parents of all children aged 9 months and above from September 2025, the DfE analysis also estimates the number of children expected to take up the expanded 30 hours childcare entitlement in September 2025. This has been used to show, in figure 10a, the anticipated childcare places needed for 9-month to 36-month-olds in the 2024/2025 academic year. As more is discovered throughout the current academic year about the uptake of the entitlement for 15 hours of early education for working parents of children aged 9 months to 36 months, the number of places needed in 2024/2025 may need to be refined.

**Figure 10a: 9-month to 36-month-olds Childcare Sufficiency Assessment (2024/2025 Academic Year)**

District	Supply of Childcare Places	Demand for Childcare Places - Sept 2025	Surplus/ Deficit of places	Places Required - Sept 2025
Ashford	1,677	2,036	-359	361
Canterbury	1,800	1,831	-31	157
Dartford	2,089	2,267	-177	177
Dover	1,180	1,490	-310	253
Folkestone & Hythe	1,261	1,317	-56	139
Gravesham	1,421	1,741	-320	301
Maidstone	2,487	2,721	-234	379
Sevenoaks	1,978	1,611	367	89
Swale	2,053	2,322	-269	329
Thanet	1,541	1,852	-312	354
Tonbridge & Malling	2,005	1,947	58	83
Tunbridge Wells	2,201	1,893	307	119
<b>Total</b>	<b>21,692</b>	<b>23,028</b>	<b>-1336</b>	<b>2740</b>

**Figure 10b: Universal Free Entitlement Places Childcare Sufficiency Assessment (2024/2025 Academic Year)**

District	3 & 4 Year Old Population	Children Requiring a 15 Hour Place	15 Hour Childcare Places Available	Surplus/ Deficit of 15 Hour Places
Ashford	2,530	1,345	1,255	-90
Canterbury	2,243	1,045	1,426	381
Dartford	2,708	1,241	1,656	415
Dover	1,825	821	809	-12
Folkestone & Hythe	1,634	736	1,162	426
Gravesham	2,268	1,295	1,241	-54
Maidstone	3,502	1,612	1,840	228
Sevenoaks	2,128	1,037	1,351	314
Swale	2,802	1,262	1,548	286
Thanet	2,369	1,053	1,433	380
Tonbridge & Malling	2,437	1,094	1,090	-4
Tunbridge Wells	2,036	1,216	1,252	36
<b>Total</b>	<b>28,482</b>	<b>13,757</b>	<b>16,063</b>	<b>2,306</b>

**Figure 10c: Extended Free Entitlement Places Childcare Sufficiency Assessment (2024/2025 Academic Year)**

District	3 & 4 Year Old Population	Children Requiring a 30 Hour Place	30 Hour Childcare Places Available	Surplus/ Deficit of 30 Hour Places
Ashford	2,530	1,055	1,058	3
Canterbury	2,243	960	1,094	134
Dartford	2,708	1,028	1,137	109
Dover	1,825	763	918	155
Folkestone & Hythe	1,634	742	733	-9
Gravesham	2,268	654	546	-108
Maidstone	3,502	1,412	1,668	256
Sevenoaks	2,128	644	938	294
Swale	2,802	1,175	1,480	305
Thanet	2,369	1,017	1,151	134
Tonbridge & Malling	2,437	925	1,181	256
Tunbridge Wells	2,036	757	986	229
<b>Total</b>	<b>28,482</b>	<b>11,132</b>	<b>12,890</b>	<b>1,758</b>

### 9.5 Sufficiency Estimates by Planning Area

Sufficiency rates have been calculated using primary planning areas. Where some primary planning areas indicate a deficit of 0-4 childcare places, consideration must be given to the fact that neighbouring planning areas may have a surplus of places and children may be travelling to access settings in adjacent areas based on parental preferences or travel to work patterns. Equally, where planning areas have more provision than children, children will be drawn from other areas to access these settings.

The percentage of funded three and four year olds accessing a setting within the planning area in which they live can be used to interpret the deficit in each planning area along with qualitative analysis to understand whether the variation in local take up rates are driven by a preference for particular providers, commuting patterns or a lack of places in the local area.

## **9.6 Future Planning**

Supporting the sufficiency, sustainability and quality of early years and childcare provision remains crucial in the aim to ensure a long term, sufficient supply of places.

The supply of Free Entitlement places for 9 months to four year olds will be kept under review as planned new housing developments are built and potentially increase the demand for places. Where housing developments are proposed in school planning areas where there is an indicative deficit of places or where the size of a development means that it will require new provision; KCC will engage in discussions with developers to either seek funding to provide nursery provision which may include securing community rental or leasehold accommodation availability for private, voluntary or independent sector providers of 0-4 year old childcare.

When a new school is delivered according to the ESFA Baseline Design, a nursery space is now included in the design. As new schools are planned, KCC will work with the sponsor to identify early years provision and the most appropriate way to deliver this.

## 10. Commissioning Plan Post-16

The work of Pathways for All, the county's 16-19 review, is moving on rapidly. The strategic board is well established and the recommendation implementation groups have been working for over two years. A new chair has been appointed from within the county and is working with the Strategic Board to develop an updated strategy. The priorities from this strategy are:

- To secure a mechanism that creates joint ownership of knowledge and skills between providers and employers in Kent and Medway
- To create relevant and viable Level 3 provision across Kent and Medway that reflects regional skill needs, whilst providing meaningful choice, an outstanding learning experience and strong progression.
- To ensure there is an offer that enable learners who have SEMH needs to reengage with mainstream provision and perform as well as those cohorts that do not.
- To ensure there is an appropriate and local offer to enable learners who have SEND requirement to increase their life choices and meet their full potential.
- To increase the number of learners, including those with SEND, studying at Level 2 from a GCSE base of less than 2 (Level 1 entry criteria).

Another development is the establishment of Local Collaborative Partnership Areas (LCPAs), bringing together senior leaders in travel to learn areas across the county to plan a coherent offer at a local level. All areas have appointed a lead to drive the work in the area and have begun setting priorities.

### 10.1 The LCPAs and their Priorities

#### **Dartford/Gravesham/Swanley**

- Develop comms between education providers, parents and young people.
- Map and analyse the local post-16 offer.
- Widen participation and developing effective pathways for all young people.
- Pilot a more common approach to CEIAG across the area.
- Develop SEN provision and level 1/Entry qualifications.

#### **West Kent**

- Understand the context (Attainment, Provision, NEETs).
- Build sufficient provision at all levels and for all need types. (levels and SEND).

#### **Maidstone**

- Strategic conversations regarding planned curriculum offer and joint approach to qualification reforms.
- Map and analyse the local Post 16 offer.
- Widening participation and developing effective pathways for all young people.
- Working with RIG 2 to pilot a more common approach to CEIAG across the area.
- Developing a plan for students taking non-traditional routes.

#### **Sittingbourne and Sheppey**

- To set up and develop a genuine and formal collaboration between the post 16 providers in Sittingbourne and Sheppey District.
- To research, establish, review and communicate a shared understanding of the district offer at post 16 particular at level 2 and below.
- To work together to create a platform of communication and action that enable a wider set of experiences of different providers and courses for our vulnerable students that might otherwise become NEET.

## **Ashford**

- Establish clear provision mapping of the current local provision for L1 – 3.
- Develop an updated offer for L1/2 learners.
- Develop an updated offer for L3 learners (mid to lower) to meet the needs of all learners as well as match the needs of the local economy.
- Develop new and collaborative approaches to communicating the Post 16 offer to students and their parents.

## **Folkestone and Hythe**

- Consider the development of long transition programme and preparing for adulthood approach through KS3 and 4. Potentially using the future skills questionnaire to track their preparedness over time.
- Consider what a Folkestone cycle of business could look like. Setting about key points in the year which could support transition, collaboration, and strategic sharing of key information.
- Review and share the mental health support for learners across Folkestone.

## **Canterbury/Faversham/Thanet**

- Set out, and consult upon, what the comprehensive local post-16 'area offer' should include as a minimum.
- Encourage schools with sixth forms, local GFEC(s) and work-based and other learning providers to construct their own 'area offer'. This should combine academic (A level) and vocational programmes to replace qualifications set to be discontinued.
- Encourage the strong collaboration required to deliver this offer, based on specific local circumstances and needs.
- Progressively review all collaborations to ensure they are delivering strong, effective and truly comprehensive area offers.
- Continue to lobby Government to moderate the impact of vocational qualification reforms and ensure adequate provision at Level 3 for those whose Level 2 attainment does not allow progression to T or A levels.

## **Dover**

- difficulties have been encountered in this area in commencing those strategic discussions due to delays in appointing a chair. Work to develop priorities for this area only commenced during the Autumn Term 2024.

The low-level offer for learners outside of school and colleges is changing rapidly. As expected, the number of places available across the county declined from 1106 in 2022-23 to 733 in 2023-24. During the same period, the number of training providers dropped from 20 to 18. This was due to the ceasing of European Social Fund support and short term, covid related funding. Work with the DFE has been ongoing for several years to fill these gaps and they have now agreed to allocate an additional 450 places for the county. A new training provider also commenced delivery in September 2024 and some district councils have begun to allocate small amounts from their Shared Prosperity Fund allocation to support skills. This should begin to stabilise the training provision in most areas.

The defunding of applied general qualifications (BTECs etc) has been paused which means that the current Kent 6<sup>th</sup> form offer is likely to remain unchanged for at least the next year until a decision on how to proceed has been made by the new government. There had been concerns that the offer for lower achieving students wishing to study at Level 3 would narrow. This is now not the case.

To further enhance the forecasting and planning of provision for both mainstream Post 16 students and students with SEN, the FE colleges within Kent and Medway are working to produce robust assessments of their capacities which can be referred to in future iterations of the KCP. Previously the only data published was for school sixth forms which meant a full assessment of surplus or deficit place numbers could not be made for the sector.

## 11. Appendices

### 11.1 Forecasting Methodology Summary

To inform the process of forecasting Primary school pupil numbers, KCC receives information from the Kent Primary Care Agency to track the number of births and location of Pre-school age children. The Pre-school age population is forecast into Primary school rolls according to trend-based intake patterns by ward area. Secondary school forecasts are calculated by projecting forward the Year 6 cohort, also according to trend-based intake patterns. If the size of the Year 6 cohort is forecast to rise, the projected Year 7 cohort size at Secondary schools will also be forecast to rise.

It is recognised that past trends are not always an indication of the future. However, for the Secondary phase, travel to school patterns are firmly established, parental preference is arguably more constant than in the Primary phase and large numbers of pupils are drawn from a wide area. Consequently, forecasts have been found to be accurate.

Pupil forecasts are compared with school capacities to give the projected surplus or deficit of places in each area. It is important to note that where a deficit is identified within the next few years work will already be underway to address the situation.

The forecasting process is trend-based, which means that relative popularity, intake patterns, and inward migration factors from the previous five years are assumed to continue throughout the forecasting period. Migration factors will reflect the trend-based level of house building in an area over the previous five years, but also the general level of in and out migration, including movements into and out of existing housing. An area that has a large positive migration factor may be due to recent large-scale housebuilding, and an area with a large negative migration factor may reflect a net out-migration of families. These migration factors are calculated at Pre-school level by ward area and also at school level for transition between year groups, as the forecasts are progressed.

Information about expected levels of new housing, through the yearly Housing Information Audits (HIA) and Local Development Framework (LDF) Core Strategies is the most accurate reflection of short, medium and long term building projects at the local level. Where a large development is expected, compared with little or no previous house building in the area, a manual adjustment to the forecasts may be required to reflect the likely growth in pupil numbers more accurately.

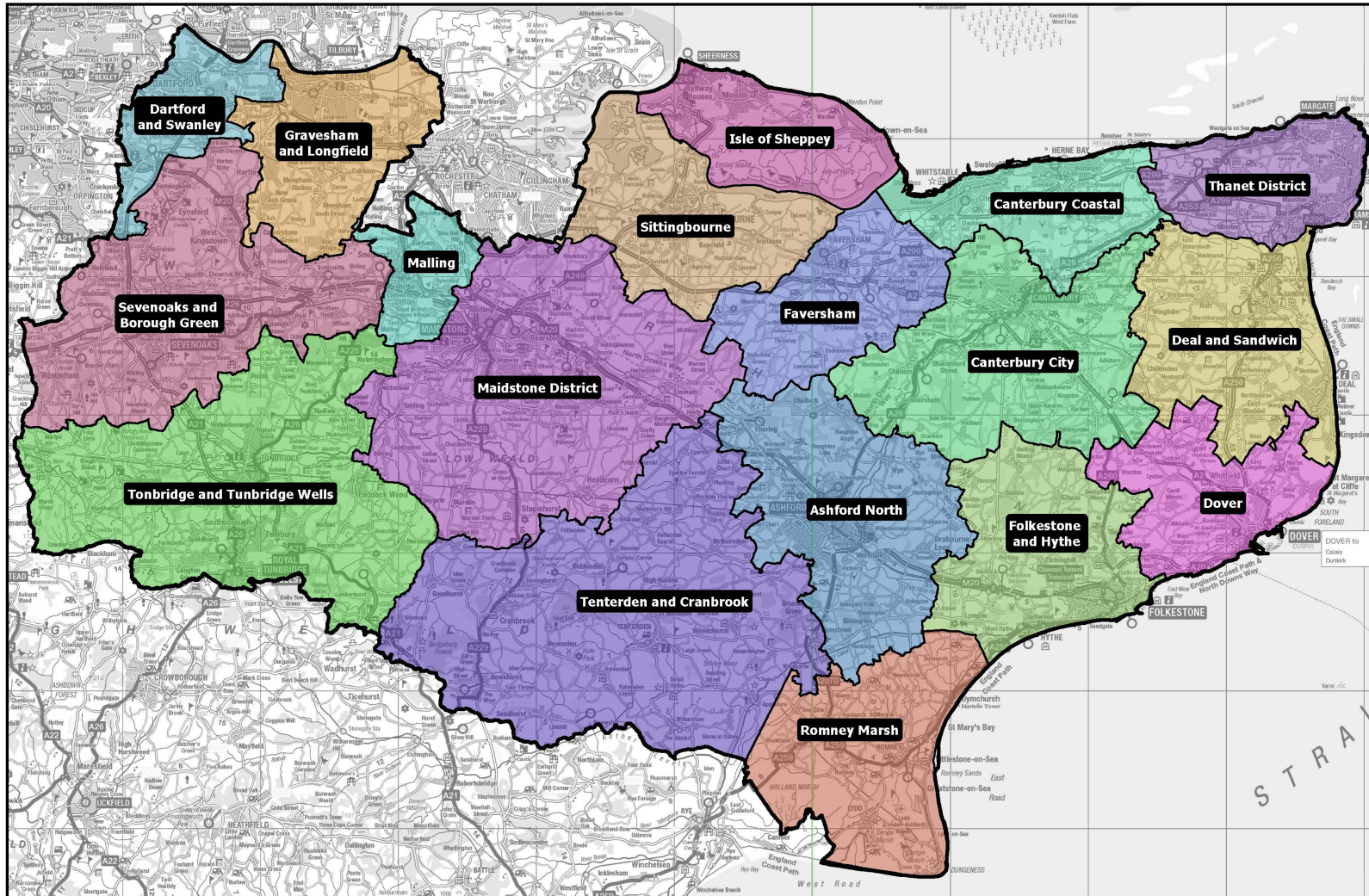
Pupil product rates (the expected number of pupils from new housebuilding) are informed by the MORI New Build Survey 2005. KCC has developed a system that combines these new-build pupil product rates (PPRs) with the stock housing PPR of the local area to model the impact of new housing developments together with changing local demographics over time. This information is shared with district authorities to inform longer term requirements for education infrastructure and the Community Infrastructure Levy (CIL) discussions at an early stage.

Forecasting future demand for school places can never be completely precise given the broad assumptions which have to be made about movements in and out of any given locality, the pace of individual housing developments, patterns of occupation and not least parental preferences for places at individual schools. This will be a function of geography, school reputation, past and present achievement levels and the availability of alternative provision.



## 11.2 Secondary Planning Group Maps

### Kent Secondary Non Selective Planning Groups

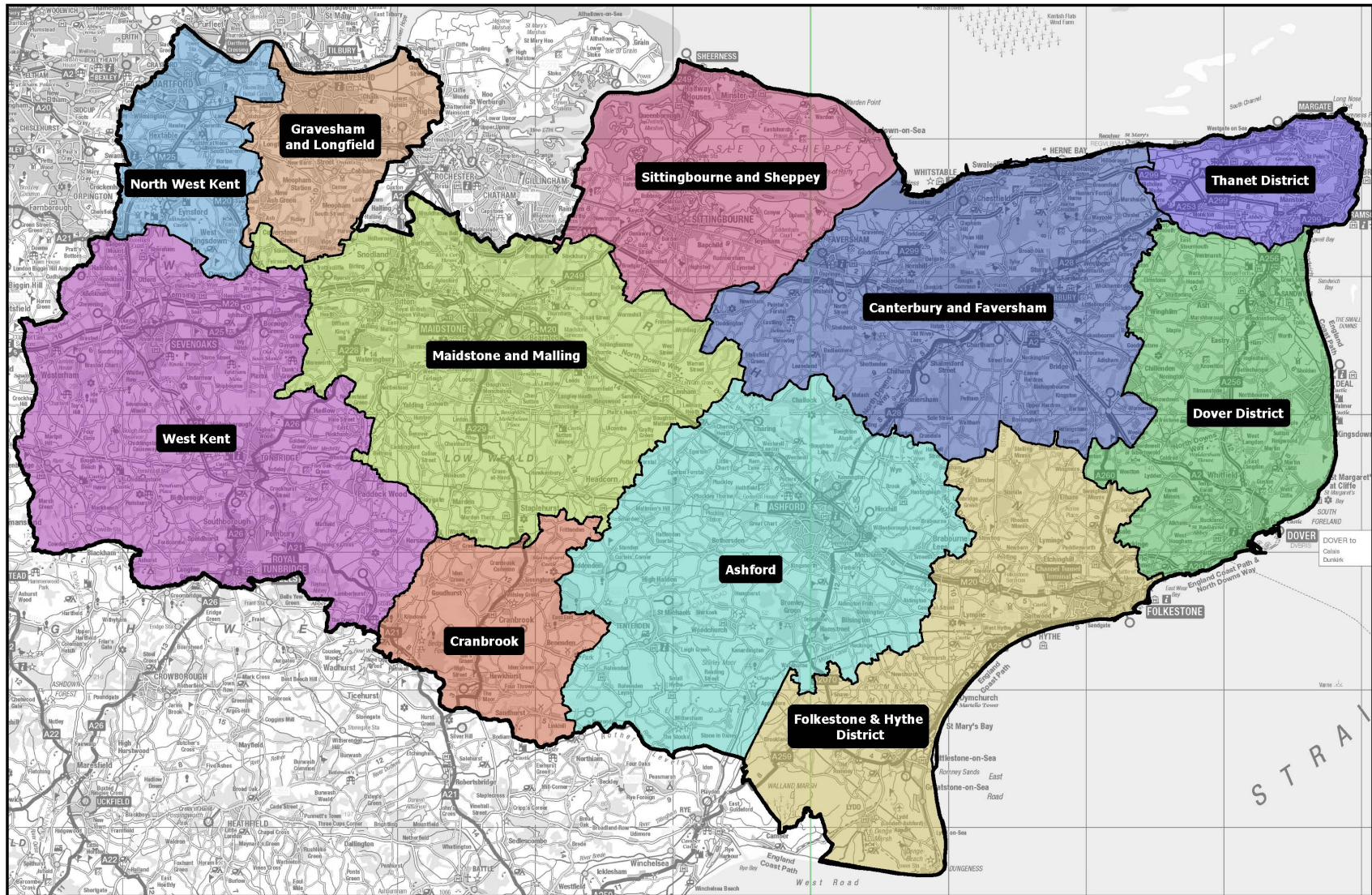


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# Kent Secondary Selective Planning Groups



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