

EQIA Submission – ID Number

Section A

EQIA Title

Special Educational Needs Integrated Therapies Joint Commissioning Strategy

Responsible Officer

Emma Hanson - CED SC

Type of Activity

Service Change

No

Service Redesign

No

Project/Programme

No

Commissioning/Procurement

Commissioning/Procurement

Strategy/Policy

No

Details of other Service Activity

No

Accountability and Responsibility

Directorate

Children Young People and Education

Responsible Service

Special Educational Needs and Disabilities (SEND)

Responsible Head of Service

Christy Holden - CED SC

Responsible Director

Christine McInnes - CY EPA

Aims and Objectives

The 2015 Special Educational Needs and Disability (SEND) Code of Practice, sets out that Speech and Language Therapy, Occupational Therapy, Physiotherapy and Assistive Technology should be jointly commissioned.

KCC is working towards a jointly commissioned Integrated Therapy Service, which will include the Kent and Medway Communication and Assistive Technology Service (KMCAT), to maximise the use of finite resources from local authorities, schools, colleges, and the NHS improving outcomes for 0–25-year-olds with SEND and their parents/carers.

The joint aim is to establish a new jointly commissioned service by September 2025, to fall in line with NHS Kent and Medway's broader recommissioning of a unified Community Service Offer.

Section B – Evidence

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

Yes

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

Yes

Is there national evidence/data that you can use?

Yes

Have you consulted with stakeholders?

Yes

Who have you involved, consulted and engaged with?

Discovery interviews were held with 33 stakeholders including parents, SEN staff, The Education People (TEP), KCHFT, EKHUFT and NHS Kent and Medway. These interviews established common themes to inform the future commissioning strategy and reinforce ongoing transformational activity to embed the Balanced System® Framework for SLCN.

As well as identifying issues with capacity, the lack of clear pathways and the need for a properly articulated tiered approach, those interviewed also varied greatly in their understanding and approach to what was a health need or an educational need for Integrated Therapy and there was inconsistency about when and why Therapies should be considered and written into Section F or G of the EHCP.

This lack of clarity about responsibilities, reinforces the need for future Therapy provision to be jointly commissioned, because of this, if parents find they are on a waiting list for NHS Therapy, then some are using the EHCP process to ensure the need for Therapy is included in Section F of their child's EHCP, this makes the need for Therapy an educational requirement and placing the responsibility on KCC to provide. As evidence of this, in recent years, KCC has seen the number of pupils receiving spot purchased Therapies increase and therefore the budget.

KCC has also met and held individual discovery interviews with 18 of the 25 Kent Maintained Special Schools to ascertain their impression of current therapy provision and their aspirations for the future commissioned provision. Although these interviews have not been fully analysed and written up, there have been interest themes emerging that will inform the future commissioning strategy. There is a postcode lottery of provision with schools responding very differently to the therapeutic needs of their pupils. Some schools have invested in their own therapy provision using High Needs Funding, whilst others have taken the stance that this is the NHS/Council's role. In the new commissioning strategy using the Balanced System® framework we hope to set out more clearly what should be expected of schools and the whole SEN system to create a more coherent and consistent offer.

Ensuring that children, young people, and their families/carers are involved in the development of future delivery models to inform our joint commissioning strategy, we have sought to engage families, initially via a survey which was widely circulated and completed by 109 parents, of which 60% said that they would be willing to participate in future opportunities to shape Therapy provision.

Following up with willing parents a Therapies Commissioning Co-design Steering Group has been established with five parents, a KCC employed Lived Experience Practitioner, SEN Service and Commissioning representatives.

The Group now meets fortnightly to support the engagement of more families in the development of wider collaboration and co-design as this commissioning activity develops.

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

No

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

Yes

Section C – Impact

Who may be impacted by the activity?

Service Users/clients

Service users/clients

Staff

Staff/Volunteers

Residents/Communities/Citizens Residents/communities/citizens
Are there any positive impacts for all or any of the protected groups as a result of the activity that you are doing?
Yes
Details of Positive Impacts
Extending the existing Contracts providers stability whilst we work with a range of stakeholders on what the new contract post 2025 will look like.
Negative impacts and Mitigating Actions
19. Negative Impacts and Mitigating actions for Age
Are there negative impacts for age?
No
Details of negative impacts for Age
Not Applicable
Mitigating Actions for Age
Not Applicable
Responsible Officer for Mitigating Actions – Age
Not Applicable
20. Negative impacts and Mitigating actions for Disability
Are there negative impacts for Disability?
No
Details of Negative Impacts for Disability
Not Applicable
Mitigating actions for Disability
Not Applicable
Responsible Officer for Disability
Not Applicable
21. Negative Impacts and Mitigating actions for Sex
Are there negative impacts for Sex
No
Details of negative impacts for Sex
Not Applicable
Mitigating actions for Sex
Not Applicable
Responsible Officer for Sex
Not Applicable
22. Negative Impacts and Mitigating actions for Gender identity/transgender
Are there negative impacts for Gender identity/transgender
No
Negative impacts for Gender identity/transgender
Not Applicable
Mitigating actions for Gender identity/transgender
Not Applicable
Responsible Officer for mitigating actions for Gender identity/transgender
Not Applicable
23. Negative impacts and Mitigating actions for Race
Are there negative impacts for Race
No
Negative impacts for Race
Not Applicable

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