

EQUALITY IMPACT ASSESSMENT AND ANALYSIS (EqIAA)

STRATEGY FOR CHILDREN AND YOUNG PEOPLE WITH SPECIAL EDUCATIONAL NEEDS DISABILITIES IN SOUTH GLOUCESTERSHIRE 2018 - 2023

SECTION 1 – INTRODUCTION

For the purpose of this impact assessment, children refers to children, young people and young adults.

The SEND Strategy sets out the vision, priorities and activities that will be implemented from 2018 – 2023 for children with special educational needs and disabilities from 0-25 years old. The Government have suggested that all local areas should have a strategy in place so that all stakeholders have a clear understanding of the level of need, demand for services and activities to be implemented over the five year period.

The Strategy outlines all activities across education, social care, health and leisure that will be developed to support pupils with Special Educational Needs and disability.

SECTION 2 –RESEARCH AND CONSULTATION

Research

At any one time there are approximately 6,600 children aged between 0-25 years with SEND. 1,700 children have more complex needs and have an Education Health Care (EHC) plan. 4,750 children identified with SEND have an SEN Support plan.

SEN Categories of Need

The Government identify 12 categories of SEND. The local authority have completed analysis in May 2017 to provide a breakdown of SEN categories of need for the children and young people with an EHC plan or statement of SEN and therefore with most complex needs.

Primary Need	Description	% total Primary need for pupils with EHC plans
ASD	Autistic spectrum disorder	26.6%
SLCN	Speech, language & communication needs	18.2%
MLD	Moderate learning difficulty	15.3%
SEMH	Social, emotional, mental health	14.8%
SLD	Severe learning difficulty	8.4%
PD	Physical disability	8.2%
HI	Hearing impairment	3.1%
PMLD	Profound and multiple learning difficulty	1.7%
VI	Visual impairment	1.5%
SPLD	Specific learning difficulty	1.3%
OTH	Other difficulty/disability	0.8%
MSI	Multi-sensory impairment	0.2%

Source: July 2017 data report to Schools Forum (May 2017 data)

Ethnicity

The analysis of SEND cohort of children with EHC plans and SEN Support at schools broadly mirrors the ethnicity profile of all pupils in the local area.

ETHNICITY	EHCPS	SEN SUPPORT	ALL PUPILS
WHITE BRITISH	86.6%	86.8%	83.90%
MIXED	4.9%	4.4%	4.90%
WHITE NON-BRITISH	2.9%	4.1%	4.70%
ASIAN	2.1%	1.9%	3.30%
BLACK	1.9%	1.4%	1.60%
CHINESE	0.2%	0.3 %	0.30%
ANY OTHER	0.2%	0.3%	0.50%
UNCLASSIFIED	1.2%	1.0%	0.70%

Source: SEN2 data return 2017

Gender

74% of the children and young people with EHC plans are boys. It is expected that there will be a higher percentage of male children with EHC plans than females as the incidence of SEN and disability is higher in boys than in girls. This is for a number of reasons: the key ones are that there are more genetic syndromes that effect boys than girls and boys are more likely to be referred for a medical diagnosis. There is growing evidence that female children are less likely to be identified with SEN as their behaviours are less likely to bring them to the attention of education and health professionals. It is therefore expected that the incidence of female children being issued EHC plans will increase slightly but a differential and imbalance will remain.

Source: all pupils with EHC plan list 12 Dec 2017

Age

The table below provides information on the number of children with an EHC plan by year group and category of need.

Year group	ASD	HI	MLD	MSI	OTH	PD	PMLD	SEMH	SLCN	SLD	SPLD	VI	Grand Total
-2	1			1		4	1		2	2			0.7%
-1	5		1		1	6			13	4		1	1.9%
0	28	3	7		1	2		6	30	3		2	5.0%
1	26	3	2		2	4	1	10	29	6	1	1	5.2%
2	20	4	5			8	2	13	26	11		2	5.5%
3	21	2	11	1	1	12	2	9	17	5	1	3	5.2%
4	24	5	17		3	5		11	25	12			6.2%
5	24	6	16			16	3	14	17	11	2		6.6%
6	27	3	26			8	2	19	13	9	1	1	6.6%
7	25	3	12		2	5	1	24	22	7	3	1	6.4%
8	25	2	18		1	10		18	26	9	3		6.8%
9	32	3	17	1		15	1	26	13	7	1	4	7.3%
10	23	1	19		1	11		21	13	6	1	2	6.0%
11	47	3	28		1	6	4	21	22	1	3	2	8.4%

12	34	3	24	1		3	3	20	11	7	2	3	6.8%
13	36	2	23			8	2	21	11	9	2		6.9%
14	22	3	16			3	2	5	4	10		1	4.0%
15	9	3	5			3	3	3	1	7	1		2.1%
16	5	1	1			4			1	6			1.1%
17	2		3			2				5			0.7%
18		1						2				1	0.2%
19									1	1			0.1%
20									1				<0.1%

Source: July 2017 data report to Schools Forum (May 2017 data)

Access to Support and Quality of Support

Based on forecast demand and through the development of the Specialist Planned Places Strategy, the local authority has expanded places to meet the needs of the following groups of children with SEND at specific age groups. Places are open for male and female pupils.

- Warmley Park School – places for pupils with Severe Learning Difficulties (all ages but a focus on post 16)
- New Siblands School – places for pupils with Severe Learning Difficulties (nursery)
- Lyde Green Unit – places for primary aged pupils with Severe Learning Difficulties (Reception to Year 6)
- SGS Pegasus School – places for primary aged pupils with autism. The school will grow to cater for secondary and post 16 pupils
- New Free School for Severe Learning Difficulties aged 2 -19

Ofsted judgements for all special schools are good or better and support the view that pupils achieve their potential and positive outcomes are delivered.

Consultation

The consultation output report provides full details of the results and feedback received. Additionally, this EqIAA notes that the consultation survey put forward a specific question regarding equalities as follows:

We want to ensure that all young people receive the support they need and achieve appropriate outcomes regardless of their background. Are there any points you would raise in respect of Gender, Race or Age or any other equalities related issue that you feel the Strategy should take account of?

The following responses were received in response to this question:

1. Currently some service access criteria is discriminatory. See comments: Families need to understand the criteria for services that are advertised in the local offer/SEND Pathways. Criteria must be clear, flexible enough to respond to need and not discriminate against particular groups eg access to 0-25 social care does not take into account the impact of acute mental health, attachment difficulties or undiagnosed conditions. Access to the 0-25 transition team is dependent on the family having a social worker and the child not having SEMH difficulties. Access to appropriate mental health support via CAMHS LDT requires an IQ of less than 50!"). This needs to be addressed.
2. It is crucial that all Parents/ Carers are given appropriate information in a timely way about support being offered. This needs to be made accessible to all in different formats,
3. It's only those who have caring proactive parents who will ever be able to get the help and support they need
4. Children with a recognised private diagnosis should be accepted and treated the same as if it were by the NHS, surely this would take pressure off the system and get things moving as a whole system quicker.
5. Access to life skills training for young people who pursue a higher level academic route post 16 yet still need support in this area
6. It would be good to promote equity rather than equality, some SEND children/young people will need more support than others to achieve the same things so an equitable chance is fairer than an equal chance.
7. Equalities and diversity awareness needed in all schools and inclusion policies implemented
8. Children who come from vulnerable families need help sign posting. not all parents will scream and shout if they get left behind
9. Schools often focus on FSM, gender and race and look for trends within these groups. Within my own setting the biggest barrier for all children but especially for those with SEN/D is the experience of trauma - children who have been on the CP register or who have high ACE scores consistently miss their targets and if they also have SEN/D outcomes are even worse. How do we help children who live in chaotic circumstances to have a voice and who will speak for them if their parents will not. My own setting is not a 'typical' South Glos school but there are others like us who work in deprived areas and work with children who do not receive the support they deserve because their parents can't or won't engage in the system. These children often fail. I'm not sure the draft strategy addresses this group.
10. I agree with your views
11. Age: support peters out from year 11 onwards. There is little support for most SEND YP as they look towards post-16 options. There is no proper support for many SEMH YP for post-16 education. There is some post-16 support/educational establishments for certain severe SEND YP. But, as I've said before, where do your post-16 SEMH kids end up? And this all needs to be up to 25. I don't see anything for that age group unless they have severe SEND. Where is the support for housing? Transition to adult services?
12. This should tie in with a National Strategy, if one exists, and consider sharing resources with neighbouring councils or National authorities where appropriate.
13. As noted under Q10, consideration needs to be given to parents who are unable to access information

on the internet or who are not able to read information in English.

SECTION 3 - IDENTIFICATION & ANALYSIS OF EQUALITIES ISSUES AND IMPACTS

In respect of the consultation feedback received, the following table provides a response to each point:

Feedback Received	Response
Currently some mental health services access criteria is discriminatory. This needs to be addressed.	This is an important point which relates to mental health services. Services are working together to assess their thresholds and criteria to ensure that they are not discriminatory in any respect and any address any gaps identified.
It is crucial that all Parents/ Carers are given appropriate information in a timely way about support being offered. This needs to be made accessible to all in different formats,	Relevant training for staff will be completed and will cover these equalities issues, including the Council's accessible communications policy.
It's only those who have caring proactive parents who will ever be able to get the help and support they need	The SEND Partnership Board will carry out equalities related monitoring which will allow for the identification of these issues and any gaps to be addressed. The SEND Action Plan will be written post approval of the Strategy and will focus on achieving equality. We work closely with the Parent Carer Forum to address these issues, and in addition, Supportive Parents are commissioned by the DFE to support parents/carers. We also work closely together with Supportive Parents to address these issues.
Children with a recognised private diagnosis should be accepted and treated the same as if it were by the NHS, surely this would take pressure off the system and get things moving as a whole system quicker.	Each case is looked at individually and regard is given to Private Assessments in line with the Code of Practice for Special Educational Needs 2015.
Access to life skills training for young people who pursue a higher level academic route post 16 yet still need support in this area	There are providers who offer Post 16 opportunities for children with SEND. These will be available on the Council's Local Offer Website.
It would be good to promote equity rather than equality, some SEND children/young people will need more support than others to achieve the same things so an equitable chance is fairer than an equal chance.	This point is accepted and is the foundation of the SEND Strategy. Equality is about treating people according to their needs (which differ) as opposed to treating everyone the same. The SEND Strategy itself is built upon this principle.
Equalities and diversity awareness needed in all schools and inclusion policies implemented	We plan to deliver this as part of the SEND Action Plan.
Children who come from vulnerable families need help sign posting. not all parents will scream and shout if they get left behind	The SEND Partnership Board will carry out equalities related monitoring which will allow for the identification of these issues and any gaps to be addressed. The SEND Action Plan will be written post approval of the Strategy and will

	<p>focus on achieving equality. We work closely with the Parent Carer Forum to address these issues, and in addition, Supportive Parents are commissioned by the DFE to support parents/carers. We also work closely together with Supportive Parents to address these issues.</p>
<p>Schools often focus on FSM, gender and race and look for trends within these groups. Within my own setting the biggest barrier for all children but especially for those with SEN/D is the experience of trauma - children who have been on the CP register or who have high ACE scores consistently miss their targets and if they also have SEN/D outcomes are even worse. How do we help children who live in chaotic circumstances to have a voice and who will speak for them if their parents will not. My own setting is not a 'typical' South Glos school but there are others like us who work in deprived areas and work with children who do not receive the support they deserve because their parents can't or won't engage in the system. These children often fail. I'm not sure the draft strategy addresses this group.</p>	<p>The SEND Partnership Board will carry out monitoring on ACE which will allow for the identification of these issues and any gaps to be addressed. The SEND Action Plan will focus on achieving equality in this area.</p>
<p>Age: support tapers out from year 11 onwards. There is little support for most SEND YP as they look towards post-16 options. there is no proper support for many SEMH YP for post-16 education. There is some post-16 support/educational establishments for certain severe SEND YP. But, as I've said before, where do your post-16 SEMH kids end up? And this all needs to be up to 25. I don't see anything for that age group unless they have severe SEND. Where is the support for housing? Transition to adult services?</p>	<p>Priority 5 of the SEND Strategy focusses on Transition and actions will be included in the SEND Action Plan. Priority 4 of the SEND Strategy addresses services and provision, and services will be reviewed to identify gaps and how to address these.</p>
<p>This should tie in with a National Strategy, if one exists, and consider sharing resources with neighbouring councils or National authorities where appropriate.</p>	<p>The SEND Strategy is written to link directly with the SEND Code of Practice 2015. Sharing of resources across Local Areas is looked at and jointly commissioned where this is possible.</p>
<p>As noted under Q10, consideration needs to be given to parents who are unable to access information on the internet or who are not able to read information in English.</p>	<p>The SEND Strategy Action Plan will address how we ensure that information is provided for all in accessible formats.</p>

In relation to the 6 priorities set out within the Strategy, the following key equalities issues have been identified and are outlined in the table below along with actions to be taken to address them:

No.	Priority	Equalities Issues we have identified and what we will do about them through a review of the strategy on an annual basis	How will we know if we are successful through review on an annual basis
1	Access to information, advice and signposting	We will liaise with the Council's Equality Co-ordinator to signpost information and advice to the various Equalities groups and forums across South Gloucestershire as part of the implementation of the communication plan. This will include evaluation of how information is shared and the extent to which it is understood by service users.	We will evaluate the success criteria set out within the Strategy to include an analysis of protected characteristics and action will be taken as relevant.
2	Timely identification and assessment leading to improved outcomes	We will check whether timely identification and assessment occurs and leads to improved outcomes for children with protected characteristics.	We will evaluate the success criteria set out within the Strategy to include an analysis of protected characteristics and action will be taken as relevant.
3	Lead, co-ordinate and ensure accountability	The SEND Partnership Board will receive training in assessing equalities performance in order that the skills to support, challenge and oversee the running of the Strategy are in place.	We will evaluate the success criteria set out within the Strategy to include an analysis of protected characteristics and action will be taken as relevant.
4	Plan sufficient services and provision to be available within the community	Gaps in services as they affect children and their families with protected characteristics will be addressed where a need is identified.	We will evaluate the success criteria set out within the Strategy to include an analysis of protected characteristics and action will be taken as relevant.
5	Plan transitions from pre-school into Primary and Pre-school into Secondary	We will determine if all transitions are smooth for children with protected characteristics	We will evaluate the success criteria set out within the Strategy to include an analysis of protected characteristics and action will be taken as relevant.
6.	Support, training and development	We will plan for practitioners and services have the training, support and development required to support children and their families taking account of relevant needs associated with protected characteristics.	The skills will support the implementation of the SEND Strategy for children and families with protected characteristics.

It is clear that the SEND Strategy focuses on the protected characteristic of “Disability” and seeks to enable children with SEND to achieve their potential in a safe, caring and supportive community (as stated in the vision). As such, the entire Strategy is based on the principle of equality and facilitating and ensuring equality of opportunity for young people with SEND.

Even though the key group impacted by the Strategy and its key actions will fall under the Equality Act 2010 definition of “Disability”, it is important that the full range of protected characteristics are considered. In this respect, it is true to say that even though the Strategy focusses on young people with SEND, all of those young people will be additionally protected by the characteristics of ‘Race’, ‘Age’, ‘Sex’, ‘Sexual Orientation’ and Religion/Belief’ (it is anticipated that the characteristics of ‘Race’, ‘Age’ and ‘Sex’ are the most relevant).

An important over-arching point to raise in respect of the above is that the SEND Strategy sets out six priorities and key themes to be delivered for each priority area and a detailed action plan will be written to include these equalities related actions. As such, this EqIAA has determined to ensure that these key themes are analysed on an ongoing basis in respect of equalities issues and that the SEND Partnership Board have the skills to support, challenge and oversee this analysis, defining development actions as appropriate. This approach will ensure that issues pertaining to equalities are proactively identified and action to address issues is defined, delivered and monitored as a core and ongoing element of the delivery of the Strategy. This approach will ‘mainstream’ equalities as being fundamental and a central element of the successful delivery of the Strategy.

SECTION 4 - EqIAA OUTCOME

Outcome	Response	Reason(s) and Justification
Outcome 1: No major change required.	<input type="checkbox"/>	
Outcome 2: Adjustments to remove barriers or to better promote equality have been identified.	<input checked="" type="checkbox"/>	<p>The central purpose of the Strategy itself concerns advancing equality of opportunity for young people with SEND.</p> <p>This EqIAA establishes that protected characteristics in addition to “Disability” are relevant and has defined actions which will ensure that ongoing monitoring and any resultant improvement action is delivered.</p> <p>This approach will ensure continuous development in the provision of services for all.</p>
Outcome 3: Continue despite having identified potential for adverse impact or missed opportunities to promote equality.	<input type="checkbox"/>	
Outcome 4: Stop and rethink.	<input type="checkbox"/>	

SECTION 5 - ACTIONS TO BE TAKEN AS A RESULT OF THIS EqIAA

A wide range of actions have been identified as shown in Section 3 of this EqIAA document.

SECTION 6 - EVIDENCE INFORMING THIS EqIAA

- July 2017 data report to schools Forum (May 2017 data)
- SEN2 data return 2017
- All pupils with an EHC plan list 12 Dec 2017
- Consultation output report March/April 2018