



CHILDREN'S SERVICES AND SCHOOLS OVERVIEW AND SCRUTINY COMMITTEE

DATE: 6 DECEMBER 2018

REPORT OF: DIRECTOR OF CHILDREN'S SERVICES

**SUBJECT: DEDICATED SCHOOLS GRANT: CONSULTATION ON
FUNDING OPTIONS FOR THE HIGH NEEDS BLOCK**

1. SUMMARY

- 1.1 Expenditure on education services for children and young people with special educational needs and disabilities (SEND) continues to significantly exceed the funds allocated in the high needs block of the Dedicated Schools Grant (DSG). The accumulated overspend on the DSG fund is forecast to be £13 million by the end of 2018/19 and to increase by an additional £8 million in 2019/20. A significant change in approach is required to deliver high quality SEND services that are financially sustainable. This report provides the Committee with a summary of the public consultation on the future funding options for the high needs block of the DSG which was completed in October and November 2018.

2. PURPOSE OF REPORT GOING TO OVERVIEW AND SCRUTINY COMMITTEE

- 2.1 Cabinet is due to agree the schools' budget for the financial year 2019/20 at its meeting on 14 February 2019. This report provides a summary of outcomes from the public consultation on future funding options for the high needs block of the DSG to inform decision-making.

3. RECOMMENDATIONS

- 3.1 The Committee is asked to note and comment on the results of the public consultation to inform the schools' budget setting process.**

4. DETAIL

- 4.1 The Children and Families Act 2014 made significant amendments to local authorities' statutory duties to children and young people with SEND. This included the replacement of Statements of Special Education Needs with Education, Health and Care Plans (EHCPs), and a change to the age eligibility from 4 to 19 years to 0 to 25 years.

- 4.2 Between January 2014 and January 2018, the number of children and young people with Statements or EHCPs grew from 941 to 1239, partially as a result of the implementation of these reforms: an increase over four years of 31.7%. The average annual increase was 7.2%. Due to the change in age eligibility, 10% of EHCPs now relate to young adults in National Curriculum Year 14 (age 19) and above. This cohort is now included in the high needs block of the DSG.
- 4.3 Spend per EHCP has remained relatively constant over time; however, the number of EHCPs has grown at a significantly higher rate than the funding allocation in the high needs block of the DSG. The table below sets out the overspend on the high needs block between 2014/15 and 2017/18. The net impact on the overall DSG fund overspend is also included and is affected by the transfer of funds between funding blocks and an underspend in the early years funding block.

Financial Year	HNB overspend £m	Total DSG overspend £m	Cumulative DSG overspend £m
2014/5	1.27	0.65	0.1
2015/6	2.17	1.85	1.95
2016/7	4.01	3.86	5.82
2017/8	2.93	2.15	7.97

- 4.4 Cabinet is due to set the DSG schools' budget for 2019/20 at its meeting on 14 February 2019. To inform decision-making on this budget, consultation was completed in October and November 2018. This included consultation with the statutory Schools Forum, workshops with schools and early years providers, public consultation events, focus groups with children and young people, and an online survey. The findings of the public consultation are attached to this report as **ANNEX A**.
- 4.5 The consultation requested responses and views on a number of options for the future funding of services and support for children and young people with SEND from the high needs block of the DSG. These are summarised in the table below together with a summary of the consultation responses.

Consultation area	Summary of responses
<i>Re-prioritising funding</i>	
The movement of funds initially allocated to the schools block of the DSG to the high needs block. Mainstream schools would receive a reduced combined income; however, all schools would retain the protection of the minimum funding guarantee,	Respondents were split in their views on the proposal to transfer funds from the schools block to the high needs block (schools: 48% in favour, 45% not). Respondents raised concerns that the proposed block transfer would impact

<p>which only allows for a maximum reduction of 1.5% per annum. Increasing numbers of local authorities are supporting the movement of funds in this way.</p>	<p>negatively on teaching and learning for all children and be difficult for schools to absorb due to existing funding pressures.</p> <p>Transfer between blocks was seen by many responders as unlikely to have an impact in the long term.</p> <p>A number of parents commented that they found it difficult to choose which block, and therefore children, should receive the funding - all children should have sufficient funding.</p> <p>A number of respondents asked for the Council to lobby central government for more funding, and to enable local parents to add their voices to the lobbying.</p>
<p>The use of funds initially allocated to the early years block of the DSG for a wider range of services than has been the case in the past; specifically to fund support for children aged 0 to 5 with SEND from the early years block rather than the high needs block.</p>	<p>The majority of early years providers responding to the survey forecasted a 'medium' (62%) impact of a freeze in the hourly rate.</p> <p>Some respondents felt the impact on individual providers would be low if it was applied consistently to all providers.</p>
<p>Reviewing central costs in the high needs block and the central services block of the DSG to derive efficiency from services such as school admissions and governor support. Some of these services are statutory.</p>	<p>A number of respondents agreed that if efficiencies can be made without impacting service delivery this should be a priority.</p> <p>Respondents felt that the impact of losing some or all of the services outlined would have a disproportionately negative impact on schools for the minimal amount of potential savings.</p> <p>Caseworkers must have enough capacity to know the children and young people that they are working to support.</p>
<p><i>Promoting resilience</i></p>	
<p>Improving early intervention and outreach support to schools so that they are better able to meet the needs of children and young people without the need for an EHCP.</p>	<p>The majority of respondents agree with proposals on early intervention. Early intervention cannot take the place of statutory provision, this would be unlawful.</p> <p>To be successful, early intervention initiatives must be resourced - it is difficult in the context of budget pressures in schools - particularly</p>

	<p>therapies (occupational, speech and language and music).</p> <p>Many also feel that more evidence of the impact of early intervention must be developed before further investment of scarce resources can be made.</p> <p>Early intervention initiatives should build on local expertise and include developing strong partnerships with the community and voluntary sector.</p> <p>Early intervention should include outreach for nurseries, including Private, Voluntary and Independent nurseries (PVIs).</p>
<p>Directing additional resources towards the annual review process for EHCPs, on the basis that there may be opportunities to reduce the intervention and support specified in an EHCP because a pupil's progress means that this is no longer needed.</p>	<p>More should be done to support parents to understand the process and the system.</p> <p>More training is required for all professionals taking part in the assessment and annual review processes, particularly focussing on standards of evidence of impact.</p> <p>Improvements should be made to the statutory assessment process - some families reported that they have relied on private assessments that are then not considered. This should also reduce the rate of appeals.</p> <p>All young people who took part in our consultation exercises felt that they should have copies of their plans, only two said that they had contributed their views to the plan.</p> <p>There is broad support for investing in the annual review process, this is a statutory duty.</p> <p>The needs of children and young people must be the starting point for annual reviews, not a funding cut target.</p> <p>Most of the young people who took part in our consultation exercises had not attended their annual reviews, where they had they found it to be a negative experience.</p>
<p>Creating improved pathways and support for young people with SEND post-16, including developing vocational pathways such as traineeships and apprenticeships, and</p>	<p>Broad agreement that a better post-16 offer is needed.</p> <p>Parents/carers responded that support during transitions is crucial, including better joined up working between children and adults' services.</p>

ensuring a well-planned transition to adulthood and greater independence.	<p>Young people told us that that school should teach them more practical skills that will be useful in their adult lives.</p> <p>Young people also told us that school should talk to them more about jobs and what they want to be when they are adults, and offer a week work experience for all pupils in years 10 and 11.</p>
<i>Promoting local education</i>	
Asking special schools and mainstream schools operating specialist resource provisions to identify operational efficiencies so that commissioning costs can be reduced. Special schools are protected by the Minimum Funding Guarantee (maximum reduction of 1.5% per annum).	<p>A number of respondents commented that in the current financial context, reduction in funding for special schools and specialist resource provision could not be absorbed and would impact negatively on teaching and learning, undermining work to develop a quality local offer.</p> <p>Some respondents remarked that processes for allocating places in specialist resource provisions could be reviewed to ensure it is as effective as possible.</p>
Taking a more commercial approach to commissioning placements from the independent and non-maintained school sector in order to maximise value for money.	<p>The majority of respondents agreed with proposals to improve commissioning with independent, non-maintained and academy special school providers</p> <p>A number of respondents commented that this must be done in conjunction with developing our local offer so that suitable, positive alternatives are available</p>
Increasing the number of local specialist school places in special schools and specialist resource provisions in mainstream schools. Plans are already in place to create 56 new school places in specialist resource provisions, intention to increase to 100. Two joint applications for new special free schools have been submitted by Richmond and Kingston to the Department for Education (both 90 places, one for learners on the autism spectrum and one for learners with social, emotional and mental health needs.	<p>Proposals to establish more local specialist places are welcomed.</p> <p>A number of respondents remarked that well-funded and sufficient therapy provision is crucial to meet need and gain parents' confidence in the local offer.</p> <p>An inclusive ethos is needed across the Borough so that all schools are contributing to supporting local children and young people with special educational needs.</p>

- 4.6 The forecast schools' budget outturn for 2018/9, including the accumulated overspend from past years, is as follows:

2018/19 DSG Outturn	Budget £m	Outturn £m	Variance £m	Future Demand £m	Variance incl Future Demand £m
Schools Block	70.662	70.430	(0.232)	0.000	(0.232)
Central School Services Block	0.867	0.743	(0.124)	0.000	(0.124)
Early Years Block	14.657	14.363	(0.294)	0.000	(0.294)
High Needs Block	22.078	26.548	4.469	1.250	5.719
Sub-Total	108.263	112.084	3.820	1.250	5.070
2017/18 Carry forward	(7.971)	0.000	7.971	0.000	7.971
Total	100.292	112.084	11.791	1.250	13.041

- 4.7 Latest information suggests the 2019/20 high needs block allocation will be £250k more than 2018/19 high needs block allocation. 2018/19 expenditure is likely to be £5.8m more than 2018/19 income, and if growth in demand for high needs block services continues to increase at the current rate, expenditure is forecast to increase by £2.4m compared to 2018/9 expenditure. It is reasonable therefore to conclude that 2019/20 expenditure will exceed 2019/20 allocation by approximately £8m. Unless this is offset by underspends in other DSG blocks, this would result in a cumulative overspend of £21m at the end of 2019/20.
- 4.8 The picture is less clear for 2020/21 and beyond but in-year overspends of a similar order are possible without significant changes to the local system.
- 4.9 The projected level of overspend is not affordable for schools or the Council and therefore it is important that all local partners continue to develop and implement plans to bring the cost of high needs services more in line with the Government grant allocation, and / or find alternative sources of funding.

Legal considerations

- 4.10 The council is required under the School Standards and Framework Act to set a schools budget for its area in consultation with the Schools Forum. The schools budget covers areas of expenditure as defined in Regulations, including funding for individual school budgets, provision for children and young people with high needs, early years provision and other statutory education services relating to individual pupil education such as education welfare and admissions. The schools budget is supported by the DSG. The Council is required to use the DSG only for the purposes of the schools budget and in accordance with conditions published by the Secretary of State. The Council can however add to the schools budget from other sources.
- 4.11 Where there are significant changes to services which will impact on service users, consultation should take place with relevant stakeholders. Consultation needs to take place at time when proposals are at a formative stage, give sufficient reasons and there must be adequate time given for consideration and response. Consultation needs to take place at the point where there are sufficiently clear proposals for consultation and before the stage where it would be too late, i.e. before the budget is set in stone so that the savings have to be made. Consultation should also be used to inform detailed equalities impact assessments.

- 4.12 In considering any service changes the Council must conscientiously consider the responses to consultation and must have regard to its statutory duties under the Equality Act 2010 and the Children Act 2011. Under the Equality Act, section 149, the Council must, when exercising its functions, have due regard to the need to eliminate discrimination, harassment and victimisation and other conduct prohibited by the Act and to advance equality of opportunity and foster good relations between those who share a 'protected characteristic' under the Act and those who do not share a protected characteristic. A 'protected characteristic' is defined in the Act as age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. Marriage and civil partnership are also protected characteristics for the purposes of the duty to eliminate discrimination. An initial Equality Assessment has been undertaken and a draft is attached as **ANNEX B**. The Children Act 2004 section 11 requires that the Council must make arrangements for ensuring that its functions are discharged having regard to the need to safeguard and promote the welfare of children.

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ANNEX A: Consultation Findings

Summaries of findings from consultation activity are outlined in Parts 1 to 8 below:

Consultation activity	Summary of responses
Summary of main themes arising	Part 1
Early Years Providers	Part 2
Schools	Part 3
Workshops with Richmond schools and Early Years Providers	Part 4
Public consultation: Online	Part 5
Public consultation: Drop ins	Part 6
Children and young people (November 2018)	Part 7
Children and young people (Summer 2018)	Part 8

PART 1: Summary of main themes arising in feedback

The key themes arising across all our consultation activity are:

Theme 1: Re-prioritise funding

Block transfers

- Respondents were split in their views on the proposal to transfer funds from the schools block to the high needs block (schools: 48% in favour, 45% not)
- Respondents raised concerns that the proposed block transfer would impact negatively on teaching and learning for all children and be difficult for schools to absorb due to existing funding pressures
- Transfer between blocks was seen by many responders as unlikely to have an impact in the long term
- A number of parents commented that they found it difficult to choose which block, and therefore children, should receive the funding - all children should have sufficient funding
- A number of respondents asked for the Council to lobby central government for more funding, and to enable local parents to add their voices to the lobbying.

Savings from central services budget funded from High Needs Block

- Respondents felt that the impact of losing some or all of the services outlined would have a disproportionately negative impact on schools for the minimal amount of potential savings
- A number of respondents agreed that if efficiencies can be made without impact service delivery this should be a priority
- Caseworkers must have enough capacity to know the children and young people that they are working to support

Early years hourly rate freeze

- The majority of early years providers responding to the survey forecasted a 'medium' (62%) impact of a freeze in the hourly rate

- Some respondents felt the impact on individual providers would be low if it was applied consistently to all providers.

Theme 2: Resilience

Improved post-16 offer

- There was broad agreement that a better post-16 offer is needed
- Parents/carers responded that support during transitions is crucial, including better joined up working between children and adults' services
- Young people told us that that school should teach them more practical skills that will be useful in their adult lives
- Young people also told us that school should talk to them more about jobs and what they want to be when they are adults, and offer a week's work experience for all pupils in years 10 and 11.

Early intervention

- The majority of respondents agree with proposals on early intervention.
- Some respondents commented that early intervention cannot take the place of statutory provision, as this would be unlawful.
- To be successful, early intervention initiatives must be sufficiently resourced; it is difficult in the context of budget pressures in schools - particularly therapies (occupational, speech and language and music)
- Many also feel that more evidence of the impact of early intervention must be developed before further investment of scarce resources can be made
- Early intervention initiatives should build on local expertise and include developing strong partnerships with the community and voluntary sector.
- Early intervention should include outreach for nurseries, including Private, Voluntary and Independent nurseries (PVIs).

Statutory assessments and annual reviews

- More should be done to support parents to understand the process and the system
- More training is required for all professionals taking part in the assessment and annual review processes, particularly focussing on standards of evidence of impact
- Improvements should be made to the statutory assessment process - some families reported that they have relied on private assessments that are then not considered. This should also reduce the rate of appeals
- All young people who took part in our consultation exercises felt that they should have copies of their plans, only two (of eight) said that they had contributed their views to the plan
- There is broad support for investing in the annual review process, as this is a statutory duty
- The needs of children and young people must be the starting point for annual reviews, not a funding cut target
- Most of the young people who took part in our consultation exercises had not attended their annual reviews. The young people who had attended found it to be a negative experience.

Theme 3: Promoting local education

- Young people told us that Learning Support Assistants are helpful and kind, but there are not enough of them
- Young people also told us that physical access to buildings is generally good but PE lessons are not inclusive and they can spend a lot of time "watching"
- The majority of respondents agreed with proposals to improve commissioning with independent, non maintained and academy special school providers

- Must be done in conjunction with developing our local offer so that suitable, positive alternatives are available
- Well funded and sufficient therapy provision is crucial to meet need and gain parents' confidence in the local offer
- An inclusive ethos is needed across the Borough so that all schools are contributing to supporting local children and young people with special educational needs.

Process

Some respondents raised concerns about the survey and consultation process. Key points were:

- Insufficient information was provided on some questions to enable respondents to make an informed decision
- Achieving for Children is not able to act impartially in this matter because it will benefit from decisions to make further investment
- Insufficient controls on who completes the survey will mean that there can be no confidence that the responses are reflective of the views of residents
- Some questions in the survey are leading
- The proposals do not appear to be based on a forensic understanding of need.

PART 2: Early Years Providers - Online survey

Summary of respondents

- 24 responses
- 23% (five) childminders
- 58% (14) Nurseries

Summary of responses

To what extent do you:

To what extent do you agree / disagree with the following statements?						
	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	Response Total
1a - High needs support for 0 to 5 years olds could be paid for through the early years part of the DSG, rather than the high needs part of the DSG	4.5% (1)	9.1% (2)	54.5% (12)	31.8% (7)	0.0% (0)	22
1b - Hourly rates should be set at a level to enable this to happen and no lower than 2018/19 levels	4.5% (1)	4.5% (1)	27.3% (6)	45.5% (10)	18.2% (4)	22
1c - My setting would be able to continue to offer subsidised places if the hourly rate remains the same	9.1% (2)	18.2% (4)	45.5% (10)	18.2% (4)	9.1% (2)	22
					answered	22
					skipped	2

A number of respondents also raised the following issues:

- Limited resources to be able to subsidise more than one or two children
- The current funding rate covers just over 55% of our hourly cost
- Target EEF so that those who need it can access it

What would the impact of a freeze in hourly rates be on your provision?

						Response Percent	Response Total	
1	High	<div><div></div></div>				14.29%	3	
2	Medium	<div><div></div></div>				61.90%	13	
3	Low	<div><div></div></div>				23.81%	5	
Analysis	Mean:	2.1	Std. Deviation:	0.61	Satisfaction Rate:	54.76	answered	21
	Variance:	0.37	Std. Error:	0.13			skipped	3

A number of respondents also raised the following issues:

- Rent/ property costs and staffing costs increase annual so the hourly rate needs to do the same
- Impact would be low if consistent across all settings
- It would make our setting unsustainable

Please rank the following early years service in order of value to you in your provision:

Item	Total Score ¹	Overall Rank
Speech and language therapy	72	1
Early Years Advisory Team	68	2
SEND Inclusion Fund	49	3
Portage (home support services)	31	4
¹ Score is a weighted calculation. Items ranked first are valued higher than the following ranks, the score is a sum of all weighted rank counts.	answered	22
	skipped	2

A number of respondents also raised the following issues:

- Main presenting needs appear to be speech and language difficulties
- Ranking of need depends on the cohort

Are there any services that could be provided centrally that you feel would be of more value than existing services?

Responses included:

- More training for nursery practitioners
- To be able to access support quicker, there is always a long wait

Do you have any recommendations for how the SEN Inclusion Fund could be better used to support nursery providers in supporting children with SEND?

Responses included:

- Streamline the process
- Target the fund at settings in areas with relatively low income
- Create centres of excellence and outreach services

PART 3: Richmond Schools - Online consultation survey

Summary of respondents

- 29 responses
- 69% of respondents were headteachers; 31% other senior school leader
- 0 governors

Summary of responses

Theme 1: Re-prioritise funding so it is more closely aligned with need

1a - To what extent do you agree/disagree that Schools Forum should agree to transfer 0.5% of the Schools Block allocation to the High Needs block to increase the available budget for high needs services?

- 48.27% of respondents agree or strongly agree, 44.83 disagree or strongly disagree with this proposal:

						Response Percent	Response Total	
1	Strongly disagree		<div></div>			20.69%	6	
2	Disagree		<div></div>			24.14%	7	
3	Neutral		<div></div>			6.90%	2	
4	Agree		<div></div>			34.48%	10	
5	Strongly agree		<div></div>			13.79%	4	
Analysis	Mean:	2.97	Std. Deviation:	1.4	Satisfaction Rate:	49.14	answered	29
	Variance:	1.96	Std. Error:	0.26			skipped	0

A number of respondents also raised the following issues:

- There is already underfunding in the schools block, moving money to the high needs block will make the situation worse for mainstream schools
- Agree if this is part of longer term plan to address deficit
- The transfer of funds to HNB best option if done in conjunction with the other proposed measures to support schools and early intervention

1b - To what extent do you agree/disagree that Schools Forum should agree to transfer the maximum amount available from the Schools Block to the High Needs Block to increase the available budget for high needs services?

- 72.42% disagree or strongly disagreed with the proposal to transfer the maximum amount available. 24.13% agreed or strongly agreed:

						Response Percent	Response Total
1	Strongly disagree					44.83%	13
2	Disagree					27.59%	8
3	Neutral					3.45%	1
4	Agree					13.79%	4
5	Strongly agree					10.34%	3
Analysis	Mean:	2.17	Std. Deviation:	1.39	Satisfaction Rate:	29.31	answered
	Variance:	1.94	Std. Error:	0.26			skipped
							0

A number of respondents also raised the following issues:

- This level of funding reduction would be deeply damaging, impact on teaching and learning, including staff redundancies. This would impact on all children.
- Risk with such a reduced level of funding that schools will fall into deficit, transferring debt burden from LA to schools
- Unfair distribution of EHCPs some schools are doing more than their fair share already
- More funding needs to be available from central government

2a To what extent do you agree/disagree with the option of making savings of approximately 5% or £100k from the central services budget funded from the High Needs Block?

- 48.28% disagreed or strongly disagreed with this proposal, 27.59 agreed or strongly agreed:

						Response Percent	Response Total
1	Strongly disagree					24.14%	7
2	Disagree					24.14%	7
3	Neutral					24.14%	7
4	Agree					20.69%	6
5	Strongly agree					6.90%	2
Analysis	Mean:	2.62	Std. Deviation:	1.24	Satisfaction Rate:	40.52	answered
	Variance:	1.55	Std. Error:	0.23			skipped
							0

A number of respondents also raised the following issues:

- The impact on schools would be disproportionate to the amount you'd manage to save from this
- Already difficult to access these due to previous cuts (EP SaLT)
- Need to understand more detail on spending from each team
- More pressure needs to be put on government to fund
- Where savings can be made without impact on effectiveness this should be done

2b - Which of the services currently funded from the High Needs Block are the most important to your school (please rank in order of importance, where 1 = most important, and 7 = least important)?

Respondents ranked services in the following order:






Item	Total Score ¹	Overall Rank
Educational psychology	178	1
The SEN Team (caseworkers and management)	150	2
Speech and language therapy	145	3
Support for pupils at risk of permanent exclusion or who have been permanently excluded or who are unable to attend school for health reasons	99	4
SEN equipment	82	5
Sensory impairment support	82	6
Outreach / support for groups of children and young people who are vulnerable / under-performing academically	76	7
¹ Score is a weighted calculation. Items ranked first are valued higher than the following ranks, the score is a sum of all weighted rank counts.	answered	29
	skipped	0

A number of respondents also raised the following issues:

- It is difficult to rank as all services are important
- We provide many of these services in house (specialist nature and skills of staff)
- EP service critical but we don't get enough EP time
- SaLT should be available to children and young people without a statutory plan
- Need more support for students at risk of permanent exclusion

3a To what extent do you agree/disagree with the option of making savings of approximately 10% or £100k from the central services budget funded from the Central Schools Block?

- 51.73% of respondents disagreed or strongly disagreed with this proposal, 27.58% agreed or strongly agreed:

			Response Percent	Response Total
1	Strongly disagree		27.59%	8
2	Disagree		24.14%	7
3	Neutral		20.69%	6
4	Agree		17.24%	5
5	Strongly agree		10.34%	3

A number of respondents also raised the following issues:

- The impact on schools would be disproportionate to the amount you'd manage to save from this
- Reduction in services would be disappointing
- Savings should be achievable through greater networking with other local London boroughs' central services
- School improvement should be driven by school to school initiatives such as peer reviews

- We would not be able to manage admissions in house, much of this work in VA schools is done by the school

3b - Which of the services currently funded from the Central School Services Block are the most important to your school (please rank in order of importance, where 1 = most important, and 5 = least important)?

3b - Which of the services currently funded from the Central School Services Block are the most important to your school (please rank in order of importance, where 1 = most important, and 5 = least important)?		
Item	Total Score ¹	Overall Rank
School admissions	117	1
SPARK school improvement support	110	2
Virtual School for looked after children	82	3
School place planning	81	4
14-19 year old support (preventing NEET, transitions)	45	5
¹ Score is a weighted calculation. Items ranked first are valued higher than the following ranks, the score is a sum of all weighted rank counts.	answered	29
	skipped	0





A number of respondents also raised the following issues:

- Not all services listed are applicable/ relevant to all settings
- Provide an overview of the impact on young people of these services
- Provide more information on the impact of Virtual School and discussion on whether or not schools can achieve this if resourced. The training provided by Virtual School is excellent and highly regarded

Theme 2: Resilience - Service offer that promotes independence resilience and inclusion

Improved post 16 offer

- 38% of respondents agreed with the proposal, only 3.45% of respondents strongly disagreed (0% disagreed). 59% replied that they had a neutral view:

						Response Percent	Response Total
1	Strongly disagree					3.45%	1
2	Disagree					0.00%	0
3	Neutral					58.62%	17
4	Agree					20.69%	6
5	Strongly agree					17.24%	5
Analysis	Mean:	3.48	Std. Deviation:	0.9	Satisfaction Rate:	62.07	answered 29
	Variance:	0.8	Std. Error:	0.17			skipped 0





A number of respondents also raised the following issues:

- Primary school respondents didn't always feel qualified to respond (high rate of neutral responses)
- Sound in principle but need the resources to make sufficient impact

- Developing local non-residential options for young people with complex needs is important.

Expand early intervention

- 83% of respondents agreed or strongly agreed with the proposal to expand early intervention. Only 1 respondent (3.45%) did not agree (strongly disagreed):

					Response Percent	Response Total
1	Strongly disagree				3.45%	1
2	Disagree				0.00%	0
3	Neutral				13.79%	4
4	Agree				48.28%	14
5	Strongly agree				34.48%	10
Analysis					answered	29
	Mean:	4.1	Std. Deviation:	0.88	Satisfaction Rate:	77.59
	Variance:	0.78	Std. Error:	0.16	skipped	0

A number of respondents also raised the following issues:

- Evidence of impact of early intervention initiatives should be gathered before further investment is made
- Clarity on the early intervention support and offer available is crucial, for example Service Level Agreements setting out when and what.
- Agree with the principle, but very difficult for schools to deliver in the context of decreasing budgets.

Other improvements to our early intervention offer that respondents would like to see:

- Support in communicating with parents, particularly in helping them to understand thresholds and the EHCP process
- Transparency and accountability
- Working more closely with health visitors so that needs are flagged before a child reaches school age
- Audit of SEND practice in primary schools
- Acknowledge and invest in existing specialisms and skills to enhance learning of early years children with special educational needs (Jigsaw at Windham)
- Use the funding to support in school staff, eg support the EPs and SaLTs

Further investment in annual review process

- 86.2% of respondents agreed or strongly agreed with our proposals on further investment in the annual review process, 7% (2 respondents) strongly disagreed:

1	Strongly disagree	<div><div></div></div>	6.90%	2				
2	Disagree	<div><div></div></div>	0.00%	0				
3	Neutral	<div><div></div></div>	6.90%	2				
4	Agree	<div><div></div></div>	51.72%	15				
5	Strongly agree	<div><div></div></div>	34.48%	10				
Analysis	Mean:	4.07	Std. Deviation:	1.01	Satisfaction Rate:	76.72	answered	29
	Variance:	1.03	Std. Error:	0.19			skipped	0

A number of respondents also raised the following issues:

- Annual reviews must happen - provision should be accountable and reduced when appropriate
- Help to build trust with parents and build parental confidence that the school can meet their child's needs, where this is the case
- This is a good opportunity to review the process which can be time consuming and bureaucratic
- It is likely that annual reviews will show an increase of need, rather than a decrease
- More staff are needed to be able to deliver this

Theme 3: Service offer that promotes local education

Improved commissioning with independent, non-maintained and academy special school providers

- 76% of respondents (22) agreed or strongly agreed with this proposal. 6 respondents were neutral and one (3.45%) disagreed:

							Response Percent	Response Total
1	Strongly disagree						0.00%	0
2	Disagree			<div></div>			3.45%	1
3	Neutral			<div></div>			20.69%	6
4	Agree			<div></div>			27.59%	8
5	Strongly agree			<div></div>			48.28%	14
Analysis	Mean:	4.21	Std. Deviation:	0.89	Satisfaction Rate:	80.17	answered	29
	Variance:	0.78	Std. Error:	0.16			skipped	0

A number of respondents also raised the following issues:

- An increase in quality and cost control is essential
- A good local offer must be available in conjunction with this initiative

Respondents also commented on how else can we increase the amount of specialist local provision, including:

- All schools working with an equal proportion of local children and young people with special educational needs. Consider how to overcome barriers, including impact on data

- Develop opportunities for local schools and settings to become specialist hubs/ resources for the whole education community
- Establish specialist resource provisions in mainstream schools so that they are attractive to parents
- Develop more specialist schools attached to primary and secondary mainstream schools, particularly with SEMH, ASD and SLCN designations.

PART 4: Workshops with Richmond Schools and Early Years Providers

Summary of participants

- Two workshops
- 47 attendees

Summary of responses

1. Moving money within the DSG

Participants' comments on areas that are working well included:

- Services, as long as access is available
- Schools Block and Early Years working well at present
- Early identification very important, so funding for EY needs to remain in place

Participants' worries included:

- Reducing budgets could lead to more EHCP applications
- Existing budget pressures on schools will mean they will struggle to absorb any further reductions - further reductions will impact on all children
- It is difficult to secure enough support for existing commitments, particularly educational psychology and speech and language therapy
- There needs to be clarity on success measures
- It is difficult to resource early intervention in the context of budget pressures

Participants' priorities to make things better included:

- Protect central services, and provide more centralised support when need is high
- Invest in early intervention that supports children and young people before it gets to the point that there needs can only be met with through a statutory plan
- Build evidence of impact of early intervention to inform future service delivery and investments
- Foster an inclusive ethos across the whole borough
- Consider how the sports premium can be spent
- Consider how to increase additional funding for nursery age children, including increasing PPG for nursery age
- 30 hours free childcare should be means tested – Government needs to be challenged on this policy
- Consider possible reduction in Admissions budget – could reduce 10/15%

2. How could expenditure allocation be changed within the HNB?

Participants' comments on areas that are working well included:

- There is a relatively high percentage of children in mainstream, sixth form, special schools/maintained
- SRPs, but not sufficient capacity
- Nursery additional funding, but not really enough

Participants' worries included:

- The impact of reliance on independent and out of borough placements, and of proceedings where independent placements are disputed, on the overall budget
- The ability of the independent sector to invest in making their offer appear attractive
- Contributions of all partners to provision, including health contributions to equipment and therapies
- Risk of exclusion if children's needs cannot be met

- Budget pressures mean that mainstream schools do not have sufficient funds to support increasing and complex needs, as well as insufficient levels of training, skills and expertise
- Speech and language therapy can be effective in the early years and prevent problems later on

Participants' priorities to make things better included:

- Continue to strengthen ability to successfully promote local options at Tribunal
- Continue to strengthen local offer, including developing centres of excellence; provide more training to develop local skills and expertise in mainstream schools; improve confidence in mainstream schools; focus on enabling smaller class sizes/individualized attention
- Improve place planning and ensure aligned to need; use capacity for specialist resource provision
- Work with colleagues and partners to secure appropriate contributions from outside DSG, including social care where residential provision is the best option for the child or young person
- Keep children local if possible
- Relationships with local schools/parents/communities is key to making sure that money goes to the right places
- Develop more robust process in reviewing EHCPs and reducing provision if progress has been made.

3. How could income for HNB services be increased?

Participants' comments on areas that are working well included:

- Special schools
- SRPs where they exist
- Educational psychologists and speech and language teams are invaluable. Schools can access this provision quickly

Participants' worries included:

- Expansion of special schools – don't concentrate all resources into a location that's not accessible to all.
- Cost of transport must be part of the consideration
- More use needs to be made of evaluation of effectiveness of initiatives, interventions and models
- Better joined up working between departments and contributions from partners are needed

Participants' priorities to make things better included:

- Undertake a detailed needs analysis by location, drawing on input from families, all partners and the voluntary and community sector
- Develop an outreach model to provide support in all locations, for schools and families, including consideration of measures to enable peripatetic support staff to move efficiently around the borough
- Develop more early intervention
- Develop more nurture provisions and good quality respite care for those at risk of exclusion
- Facilitate training for school and nursery staff, including from voluntary and community sector partners such as Relate and Off the Record, particularly focussed on preventing placement breakdown
- Work with partners to secure full engagement of all elements of the system, particularly health
- Invest in supported living accommodation
- Develop an inclusive ethos in all schools across the borough

4. How could “invest to save” approaches be used?

Participants’ comments on areas that are working well included:

- Children’s centres have an important role
- Investing in more specialist provision within Richmond
- Investment in developing more SEN placements in borough

Participants’ worries included:

- Need to develop short breaks to get this service right
- Not all families can access support
- Need to understand trends and themes in tribunal judgements to inform local offer developments
- Need clearer lines on what parents are allowed to pay for in schools

Participants’ priorities to make things better included:

- Building parental confidence in mainstream by putting together the right packages of support
- Use Children’s Centres to help identify need
- All agencies and services should work together really closely, joined up thinking with FSW/social care/voluntary sector

PART 5: Public Consultation - Online survey

Summary of respondents

- 110 responses
- 89% of respondents are parent/ carers (105 people)
- 4% (5) representatives of voluntary and community organisations
- Others include Richmond residents (4); school governors/ex school governors (3); and nursery/school staff/ owners (4); other professionals (1).

Summary of responses

Theme 1: Re-prioritising funding so greater proportion is allocated to supporting children with special educational needs and disabilities

To what extent do you agree/disagree with the principle of transferring funding from schools' general budget to increase the available budget for high needs services?

- 43% of respondents agreed (30) or strongly agreed (19) with this proposal. 41% strongly disagreed (26) or disagreed (21):






						Response Percent	Response Total
1	Strongly disagree					22.61%	26
2	Disagree					18.26%	21
3	Neutral					16.52%	19
4	Agree					26.09%	30
5	Strongly agree					16.52%	19
Analysis Mean: 2.96 Std. Deviation: 1.42 Satisfaction Rate: 48.91						answered	115
Variance: 2.01 Std. Error: 0.13						skipped	43

A number of respondents also raised the following issues:

- This is a good option if there are assurances that the money would be spent meeting the needs of children and young people with special educational needs
- Schools have already seen significant budget cuts and cannot withstand further cuts
- The council needs to raise the money from elsewhere
- This will not resolve long term issues
- This could impact the education of all children in Richmond
- This should not be an either/or choice
- Richmond Council should challenge GOvernment for more funding
- It is very difficult for parents to make a judgement on which children should get funding, they all should

To what extent do you agree/disagree with the principle of making savings of between 5-10% from the overall budget for central services?

- 72% of respondents (84 people) strongly disagreed or disagreed with this proposal. 20% (23 people) agreed or strongly agreed:

					Response Percent	Response Total
1	Strongly disagree				49.14%	57
2	Disagree				23.28%	27
3	Neutral				7.76%	9
4	Agree				12.07%	14
5	Strongly agree				7.76%	9
Analysis						
	Mean:	2.06	Std. Deviation:	1.32	Satisfaction Rate:	26.51
	Variance:	1.75	Std. Error:	0.12		
					answered	116
					skipped	42

A number of respondents also raised the following issues:

- These are all services that vulnerable children desperately need
- AfC services are already stretched incredibly thin in some of these crucial areas
- The constant rotation of case workers creates inefficiencies and should be addressed
- This is preferable to reducing the schools block funding.
- Reduce central services headcount so that more money is passported to children and settings
- Put council tax up as a reduction in central services will also have a negative impact
- The Council must find a way of adequately funding all educational provision in order to fulfil statutory duties

Are there any of the services below which you would strongly oppose funding being reduced for? (Tick all that apply)

Respondents ticked the following services:

			Response Percent	Response Total
1	The SEN Team (caseworkers and management)		69.81%	74
2	Speech and language therapy		79.25%	84
3	SEN equipment		62.26%	66
4	Educational psychology		76.42%	81
5	Sensory impairment support		65.09%	69
6	Support for pupils at risk of permanent exclusion from school or who have been permanently excluded or who are unable to attend school for health reasons		69.81%	74
7	Outreach / support for groups of children who are vulnerable / underperforming academically		63.21%	67
8	Virtual School		38.68%	41
9	School admissions		40.57%	43
10	School place planning		40.57%	43
11	SPARK		37.74%	40
12	14-19 year old support		57.55%	61
Analysis		Mean: 40.93 Std. Deviation: 93.35 Satisfaction Rate: 308.4	answered	106
		Variance: 8714.54 Std. Error: 9.07	skipped	52

Theme 2: Resilience: Service offer that promotes independence, resilience and inclusion

To what extent do you agree with our proposal for an improved local offer for young people with SEND aged 16 and over?

- 53% of respondents agreed or strongly agreed with our proposal for an improved local offer for young people aged 16 and over with special educational needs, 17% disagreed or strongly disagreed:

			Response Percent	Response Total
1	Strongly disagree		12.93%	15
2	Disagree		4.31%	5
3	Neutral		30.17%	35
4	Agree		33.62%	39
5	Strongly agree		18.97%	22
Analysis		Mean: 3.41 Std. Deviation: 1.22 Satisfaction Rate: 60.34	answered	116
		Variance: 1.48 Std. Error: 0.11	skipped	42

Are there any existing services or opportunities you would like to see strengthened? Or any new services or opportunities you would like to see introduced?






Responses included the following issues:

- More ABA provisions
- Friendship groups

- Support for young adults with autism to secure employment
- Opportunities/ services for young adults with high functioning autism
- Better support during transitions
- More effective and joined up working between different departments and providers
- Music therapy/ opportunities to learn to play an instrument
- Specialist support for children with dyslexia
- AfC should adhere to the law in every single respect
- How would new provision be funded?

To what extent do you agree/disagree with the proposal to expand our early intervention offer as an 'invest to save' option?

- 55% of respondents agreed (27 people) or strongly agreed (36 people) with this proposal. 24% disagreed (11 people) or strongly disagreed (16 people):

			Response Percent	Response Total
1	Strongly disagree		14.04%	16
2	Disagree		9.65%	11
3	Neutral		21.05%	24
4	Agree		23.68%	27
5	Strongly agree		31.58%	36
Analysis	Mean:	3.49	Std. Deviation:	1.38
	Variance:	1.92	Std. Error:	0.13
Satisfaction Rate: 62.28				answered
				skipped
				114
				44

Are there any other improvements to our early help offer which you would like to see?

Responses included the following issues:

- Early intervention is a good idea and could reduce the amount of support needed later on
- Early help should begin pre-nursery, invest in supporting people at home and in training and retaining quality staff
- ABA provision
- Speech and language and occupational therapies
- Early intervention must not be at the expense of statutory provision or needs assessments for statutory provision if this is required - this is a statutory right and it would be unlawful
- Barriers to accessing early intervention should be low, and should be triggered by parents as well as schools
- Better guidance and help for parents to understand and navigate the SEND and EHCP processes
- Early intervention should be multi-professional

Do you have any comments on the plan to strengthen the process for reviewing every child or young person's EHCP each year?

Responses included the following issues:

- Input must be sought from all professionals working with a child or young person
- Caseworkers need to get to know the children and young people they are working to support
- The process is stressful enough without the threat of cutting support

- Effective annual reviews require interventions to be evaluated for their impact
- This is critical to ensuring children and young people are getting the support that they need
- Sufficient capacity is required to deliver this - one officer is not enough
- Concern that annual reviews will become more burdensome
- This is a statutory requirement
- Invest in direct support for children, not bureaucracy
- Teachers and parents could do this, invest in training teachers on it

Do you have any suggestions on how we could ensure that a child's annual review is carried out sensitively and effectively?

Responses included the following issues:

- Caseworkers need to get to know the children and young people that they are working to support
- Support parents to understand the process and involve them as much as possible
- Recruitment and retention of skilled staff with the necessary expertise
- Get an independent party to undertake the annual review
- Support professionals to gather evidence of impact and progress throughout the year
- Training for all partners on developing and writing outcomes measures
- Secure sufficient capacity for all relevant professionals to have meaningful input

Theme 3: Service offer that promotes local education, and secures better value for money from placements outside the borough

To what extent do you agree with these principles of increasing the choice and capacity of local education provision, and securing better value for money from out-of-borough provision?

- 66% of respondents agreed (46 people) or strongly agreed (29 people) with these principles. 18% disagreed (8 people) or strongly disagreed (13 people):

						Response Percent	Response Total	
1	Strongly disagree	<div><div></div></div>				11.50%	13	
2	Disagree	<div><div></div></div>				7.08%	8	
3	Neutral	<div><div></div></div>				15.04%	17	
4	Agree	<div><div></div></div>				40.71%	46	
5	Strongly agree	<div><div></div></div>				25.66%	29	
Analysis	Mean:	3.62	Std. Deviation:	1.26	Satisfaction Rate:	65.49	answered	113
	Variance:	1.58	Std. Error:	0.12			skipped	45

Do you have any suggestions of how else we could increase the amount of specialist local provision?

Responses included the following issues:

- More special school provision is required, particularly for ASD, not only specialist resource provision
- More training for teachers and teaching assistants to meet the needs of children with special educational needs

- It is not realistic to expect to provide suitable placement for every child
- Look for creative solutions, based on a real understanding of need
- Actively support home education
- Understand and learn from what independent and out of borough provisions do well
- Make the most of local expertise
- Lobby central government for more funding
- ABA provision

PART 6: Public Consultation - drop in sessions

Summary of participants

- 14 participants
- 3 events

Summary of responses

Theme 1: Re-prioritising funding so greater proportion is allocated to supporting children with special educational needs and disabilities

Participants' comments included:

- Financial support to mainstream schools to support children and young people with SEND should be maintained or increased
- Training should be delivered to all school staff to develop expertise and skills in supporting children and young people with SEND all through the day (in the playground as well as classroom)
- Outreach support to schools is crucial
- An inclusive ethos should be developed across the borough, all schools should be supported in this, with an initial focus on making school SEND information available and easy to access
- The Council and AfC should work with families and the voluntary sector to lobby government for adequate high needs funding
- Cutting funding and therefore services for children with SEND could have a significant impact on children and young people - do not underestimate psychological difficulties this can have on a child, if they are feeling low self-esteem, feelings of failure, if they are struggling at school and the impact this can have on learning

Theme 2: Resilience - Service offer that promotes independence resilience and inclusion

Early intervention

Participants' agreed with the proposal to develop early intervention initiatives, further comments included:

- Early intervention must be sufficient in primary schools or needs will broaden and gap will be wider
- Early intervention initiatives must be properly resourced.

Statutory Assessments and Annual Reviews

Participants agreed that a greater focus on the process and quality of statutory assessments and annual reviews should be a priority. Comments included:

- The content of EHCPs and annual reviews must be driven by need, not finances - safeguards should be in place to ensure reduced funding is appropriate
- This requires a properly resourced team with expertise
- Improved communication and support for parents to navigate the system is crucial
- EHCPs are incredibly important in developing the relationship between the family and the professionals.

Theme 3: Service offer that promotes local education, and secures better value for money from placements outside the borough

Therapy

Participants gave a clear message that well funded, high quality therapy provision is a priority, including:

- Speech and language intervention is needed as early as possible as it has such a huge impact on all aspects of learning - it is currently underfunded

- Children, young people and their parents must be part of decision making on changing provision, communication with families on service provision must improve
- There should be increased provision in specialist assessments

SEND Futures process

Participants also gave feedback on the consultation process, including:

- Insufficient controls on who completes the survey will mean that there can be no confidence that the responses are reflective of the views of residents
- Some questions in the survey are leading
- The proposals do not appear to be based on a forensic understanding of need
- More could be done to seek feedback from families with specific needs, for example provide hard copies of the survey to parents who are not online; and take hard copies of the survey to paediatric hospitals.

PART 7: Children and Young People - November consultation

Summary of participants

- Eight young people took part in November consultation events, five had EHCPs, three with SEN Support
- All young people attend a mainstream school
- Young people had a range of additional needs and received a range of support
- Young people were of secondary age
- Young people's views were gathered via an in-school focus group
- Young people were given an overview of the context and purpose of the consultation at the start
- The focus group was led by Grace Over, SEND Participation Officer

Summary of responses

1. Support in school

- All young people said Learning Support Assistants are mostly really nice and they listen
- All agreed that there are not enough LSAs and they are often off sick, which means you don't get support in all the lessons you need it, you can't find one when you need one and sometimes you are quite late to lessons
- 1 young person said "the support I need is slowly happening"
- Young people said having a scribe and / or laptop is helpful
- Young people said the teaching was good and that some teachers were good at offering extra support after lessons if you didn't understand
- 1 young person said all teachers needed to post the homework online, so that they could check it when they got home (rather than have to remember it)
- 1 young person said "we're very lucky to be at school - lots of children around the world aren't"

2. Inclusion

- Almost all young people agreed that PE was a lesson where they were not included
- "They try to take a sport and then make it disability-friendly, but it fails"
- Young people all agreed school should try out some inclusive sports - like inclusive basketball that can play together
- Most of the group said they spent most of their PE lessons "watching"

3. Physical Access in school

- Ramp access is good

- Pupils can have a lift key (new!) and lifts seem to work better now - but some have to leave lessons 5 minutes earlier with LSA to have enough time to transfer to next lesson and it can be hard to tell / ask LSAs to do this

4. Annual Reviews

- None of the young people shared a positive experience of their Annual Review / other school meeting about themselves
- The majority of young people said they had not attended a review / meeting about their progress
- Those who had attended their review, said “nothing changes” (even if changes were agreed in the review), “they’re boring”, “the only thing that happens is you get told off on the way home”

5. Education, Health and Care Plans and other planning

- Of the 8 young people, only 2 remembered anyone consulting with them for their EHCP - for 1 “someone came round to my house” and for the other it was “my Mum”
- Most young people did not know if they had plans and if they did know - hadn’t seen them
- Young people felt that they should see their plans “anything about you should be copied to you” - young people had a discussion about when this should start, with most feeling it should happen in secondary school, and a couple saying that you should see your plan at whatever age you want to
- The young person who had been consulted with found the questions on the form “hard” and the process of getting a plan “very, very, very, very long”
- 1 young person said that there was a difference in the support available for young people who had physical impairments and young people with learning needs - saying that she got good support for her physical needs, but her autistic sibling got “nothing”, which wasn’t fair

6. Support from other adults

- A couple of the group talked about Occupational Therapists and said they never knew when they were coming - they just turn up announced and you have to leave whatever you are doing
- The young people also talked about how awkward and embarrassing it felt when adults come in to “observe” them in class - they said that it makes them stand out from everyone else in the class and means other pupils ask them lots of questions (e.g. ‘who was that?’, ‘why did they come?’ etc)

7. Preparing for Adulthood

- Most of the group were able to think of something they want to do in the future, or - if not - something they definitely didn’t want to do
- Most felt that there was support if you said you wanted to do something, but that it was focussed on how you could do that academically - “it’s focussed on GCSEs, not what you want to be”, and “they don’t speak about what you’re going to be when you’re older”
- All of the group felt that they did not get the opportunity to learn about things that would be useful in adult life: “we learn about vikings, which is interesting, but how will that help us?” & “we don’t get to learn about stuff we’re going to do in our life, like real life, like banking, bills or how to rent a house” - “actual stuff you actually need”
- Young people felt that they should learn about these practical things in PSHE lessons, but instead they just “watched films” about drugs and gun-crime - they

recognised it was important to learn about those things too, but also want to learn about more practical things

- 1 young person said "I feel like I learned more about my life in primary school"
- The whole group felt that work experience should be available for all pupils for a week in year 10 and 11 (this is no longer organised) - a couple of young people had had work experience but only because they had organised it themselves - ALL wanted this and felt it was a good way of thinking about what work you might like
- Some of the group had completed a survey which was supposed to tell them what job they would be most suited to - but didn't rate it
- 1 young person said she had learned more about work at 'Kidzania' (a children's play area at Westfield) than at school
- Many of the young people were interested to hear about Participation activities (especially Recruits Crew) - and thought this was a good way of getting some work experience

PART 8: Children and Young People - Summer 2018 consultation

Summary of participants and methodology

- A series of in-school focus groups was conducted in order to gather the views of pupils with Special Educational Needs and / or Disability about school life and support
- Focus groups were conducted by Grace Over and Annabel Asole (SEND Participation Team) – with support from Ashley Whittaker.
- 16 pupils took part in focus groups and an additional 25 pupils completed either individual questionnaires or contributed towards a class questionnaire
- Groups were carried out in special and mainstream schools to ensure pupils with Education, Health and Care Plans and those receiving SEN Support were included
- The consultation was based around three main questions (1-3) and two supplementary ones: (4 + 5)
 1. What is going well for you at school?
 2. What is not going well for you at school?
 3. What would make school better for you?
 4. How good is the help you get from teachers and other adults?
 5. How much do you enjoy coming to school?
- Pupils were also given the opportunity to complete a True / False exercise relating to statements about school (this data is represented in pie charts throughout the report)
- A range of resources were created and provided in order to meet the needs of as many pupils as possible; resources included picture stickers sets and simple questionnaire
- Pupils' contributions have been collated by Grace Over, Participation Manager and the following pages contain a summary of the main messages and themes from this consultation
- A follow-up consultation took place in November 2018, see Annex 7 above.

Summary of responses

1. Lessons

- The most popular lessons for pupils were those with a more practical nature – such as PE / Sport, Music, Drama, Cooking, Computers, Art and DT; although Maths also featured very highly in the list
- Some reasons pupils gave for enjoying particular lessons were that they were “fun”, “it doesn’t involve speaking much” and “I can chat to the teacher afterwards and ask questions”
- PSHE generated a lot of negative comments and discussion, due mostly to what pupils saw as its very narrow focus
- Some reasons pupils gave for not enjoying particular lessons were that they were “boring”, “hard”, “embarrassing” or “I don’t get enough help in that”
- Lessons that pupils would like to do more of included a wider variety of PE and Sports (including swimming, inclusion sports and “girls sports!”), Work Experience and Independence Skills

Some quotes:

- “I wish it was all sports!”
- “Computers can’t misunderstand you”
- “I want to learn a range of social things – not just puberty and drugs all the time” (PSHE)
- “Me teaching people (would make school better) – I’d teach people how to do climbing knots”

2. Learning and progress

- Some pupils were able to share areas in which they felt they had made progress at school
- Some of the things pupils told us they found hard were spelling, reading, writing, concentrating, sitting down for a long time and exams
- A number of pupils said they found it easy to get distracted in lessons because others were “messing around”
- There was a difference of opinion about lesson length – some pupils found double lessons really hard, but others wanted longer lessons so they did not have to “rush about” so much when changing lessons
- Almost all pupils who told us about homework felt that they were given too much homework or that what they were given was too hard
- A couple of pupils who were positive about homework said that their teachers made homework “fun” for them
- Some pupils felt they could do better if they had some more support from adults
- A few pupils told us about other factors that affect how well they feel they are doing at school – including being hungry or tired or arriving late

Some quotes:

- “I think I made progress in my spellings”
- “School is hard when I do work that is hard”
- “Adults make you do too much reading”
- “I find it hard to think about and remember my work”
- “I don’t like hurrying to get to school...I arrive late at school most times”
- “I’m always tired in lessons”
- “I don’t like starting the day being hungry”

3. Breaks and lunch times

- Almost all pupils identified break times as an important and enjoyable part of the school day, although for many, they are not long enough or there are not enough of them
- Of the pupils who did not feel they were going well, the reasons included not having enough to do and having no-one to play with
- Lunchtime was again a very popular part of the school day and valuable for “socialising” and going to clubs
- However quite a number of pupils told us that lunch was too late and the break wasn’t long enough

Some quotes:

- “Change the time”
- “Lunch is too short”

4. Leisure and social activities and clubs

- Almost all pupils told us that clubs and other activities provided by their school were going well and many said that they would like there to be more of them – these included day trips, residential trips, trips into the local community and after school clubs
- Many pupils also told us that they enjoyed sports day and that they were disappointed that it did not take place every year and stopped at year 9. However, other pupils found sports days were a very negative experience that they were not able to actively take part in
- Pupils whose schools had school pets or animals also spoke very highly of them!

Some quotes:

- “We should go on more day trips”
- “I like football because I am in the football team”
- “I want to go to more after school clubs”
- “Clubs at school feel fairly comfortable”
- “I was just sitting there (at Sports Day) because I didn’t get put down for anything”

5. The physical environment and equipment

- A lot of pupils told us that having outside space and being able to go outside was really important to them; so most felt that the playground was a really positive part of school
- However several pupils said that the space wasn’t very exciting and many said there wasn’t enough equipment for them to play with outside and that school should provide more basic sport equipment like a basketball hoop, footballs, games, toys and multi-sensory play equipment
- A lot of pupils felt that their classrooms could be improved by having more information on the walls
- On the whole, most pupils gave positive feedback about their school building, however one pupil said there was not enough room for her to get around as a wheelchair user and this was the worst bit about school for her; another found the look and feel of his school environment very difficult
- A number of pupils told us that their schools were noisy, with people “screaming and shouting”, arguing or doors slamming – one pupil said that his school would be better for him if there was a quiet space he could go to
- A few pupils told us that the tables and chairs in their classrooms were very uncomfortable
- A couple of pupils whose schools have pets or regular animal visitors spoke very positively about spending time with and looking after the animals and how they would like more. One pupils said that the school gecko was his favourite thing about school

Small quotes:

- “(School is) tall and menacing; I feel uncomfortable and don’t fit in as well as others”
- “It’s grey and boring” (the playground)
- “School is hard for me because there is not enough space for my wheelchair”

6. Teachers, assistants and other adults

- Pupils spoke overwhelmingly positively about their Head Teachers and very positively about most of their teachers and how they were supporting them
- However some pupils talked about teachers who they found more difficult for a range of reasons, including their strictness and their temperament
- Pupils generally felt that teaching assistants were there to help and were mostly really helpful, but that they changed a lot which was difficult and it was hard to get to know and trust them
- A couple of pupils thought school would be better if there was someone they knew they could talk to about their worries – whether that was a particular teacher they trusted, psychologist or a School Nurse
- Pupils who had received support from other adults coming into school – such as Occupational Therapists, Speech Therapists or Physiotherapists - gave mixed responses about their experiences. A few pupils talked positively about Speech and Language Therapy, but said they no longer received this support and would like to again.

Some quotes:

- “One teacher is confusing – sometimes she is happy and dancing and then she is really strict”
- “Our head teacher makes us happy”
- “I don’t think my teacher understands me”
- “My teachers are looking if I am doing well”
- “I am shy – it’s hard to meet new adults. It is better having information about them first”
- “They are always changing – I don’t know what they do” (Occupational Therapists)

7. Friends and relationships

- ‘Friends’ was the most popular answer given to the question “What is going well for you at school?”
- Some pupils identified that friendships could be tricky and that it was difficult if you fell out
- 1 pupil felt they did not have any friends and would like some
- Whilst they identified good friends, a lot of pupils also talked about other pupils who they did not get on so well with or who made school more difficult, through disrupting lessons, being mean to others, using bad language, arguing, name-calling or bullying

Some quotes:

- “I have friends – school friends are entertaining!”
- “I have lots of nice friends”
- “I have no-one to talk to at break time”
- “Some students tell me to shut up”
- “I get distracted then I can’t learn, I can’t focus, then I start talking too”

8. Rules, rewards and sanctions

- Many pupils told us that getting rewards and awards was a good part of school for them, although they said that it would be better if this happened more
- Some pupils told us that it was important that pupils behaved well, were polite and showed respect
- A few pupils told us that there were times when they needed to calm down or behave better and they were able to explain what would help them to do so i.e. “When I get upset or angry I need 5 minutes time out”
- Sanctions and rules both generated a lot of comment and response from pupils, mostly who felt that there were too many rules and they were tricky to keep

Some quotes:

- “I like collecting tokens”
- “Rules are hard to stick to”
- “Everything is getting banned and your phone should be allowed at break”
- “They don’t specify the reasons the rules exist until you have broken them”
- “Sanctions can ruin morale”

9. Participation in choices and decision-making

- Only a few pupils chose to use the ‘Reviews and Meetings’ sticker and stuck it under the ‘things that are going well’ heading. No further comments or responses were received about Annual Reviews from pupils
- Some pupils talked about School Councils, however none identified this as something that was going well. Pupils who were involved in a school council felt they needed to be more fun and those who weren’t involved expressed that they would like to be

- Pupils didn't give any examples of information they received, choices they made or decisions they had been involved in

Some quotes:

- "It needs to be better – it is too long and not fun" (School Council)
- "There is too much talking" (School Council)
- "I don't know who they are or what they do" (School Council)

ANNEX B: Draft Equality Assessment
**achieving
for children**
DRAFT Equality Assessment (EA)

Service Area:	Special Educational Needs and Disabilities (SEND)- DRAFT
Name of service/ function/ policy/ project being assessed:	Achieving for Children- Financial Strategy for High Needs expenditure in Richmond
Officer leading on assessment:	Ashley Whittaker, Programme Director
Other staff involved:	Henry Kilpin, Head of Strategy and Programmes; Ian Dodds, Interim Chief Executive; Suzanne Payne, Associate Director for Strategy and Transformation; Aveen Kelly, Head of Policy, Performance and Analysis- Richmond and Wandsworth Council (lead for equalities); Mandy Wright, Chair of Richmond Council External Scrutiny Stakeholders Group

BACKGROUND**1. Briefly describe the service/ function/ policy/ project:****Introduction**

The Schools Budget is funded from the Government's ring-fenced Dedicated Schools Grant (DSG). There is a significant cumulative deficit in the Schools Budget account in Richmond. The key area of financial pressure relates to support for children who require additional support with their education (high needs) which is currently running at an unaffordable level. At the end of 2017/18 there was a cumulative overspend of £8m but the forecast is for this situation to become significantly more pronounced during this financial year and in the future. It is important therefore that all services responsible for supporting LBR residents with special educational needs and disabilities between the ages of 0 and 25 years change the way that they provide support to either reduce the need for these services, or reduce the costs of providing the same.

Over recent years, and particularly since March 2018 and during autumn 2018, the Council has been consulting through Schools Forum, directly with schools and with the wider community on how the HNB can be brought back into a balanced financial situation in the coming years, as the current level of overspend is simply not sustainable. As a result, Achieving for Children (AfC) has developed a number of potential options which will contribute towards an overall strategy to address the deficit. These options will be considered by Councillors in Richmond as part of the Schools Budget setting process for financial year 2019/20 to be finalised at Cabinet on 14th February 2019.

Overview of Education Funding and National Context

On 1 April 2018 Government began the transition towards a new national funding formula for education funding. The national funding formula will be fully implemented from 1 April 2020 and 2018/19 and 2019/20 will be transitional years where local authorities and schools will transition towards the new formula. Money will be allocated to Local Authorities on a national formula funding basis in 2018/19 and 2019/20 but it will still be for the Council in consultation with Schools Forum to set a local formula to distribute this funding between schools.

DSG funding is split into four blocks; the Schools Block, the High Needs Block (HNB); Early Years Block and the Central School Services Block. Although the overall DSG is ring fenced, the blocks themselves are not, although the amount that can be transferred is limited under the funding scheme.

The Schools Block can be broken down into two areas:

- Schools Block (delegated) – This funding is delegated to schools. At least 80% of the funding must be allocated through pupil led factors. These must include a basic entitlement funded through the age weighted pupil unit (AWPU) and a factor for deprivation. It can also include optional factors. In Richmond this includes a prior attainment factor to provide additional funding for schools as a proxy measure of the level of SEND at the school, a lump sum for each school, funding for English as an additional language, a mobility rate for pupils that join after the October census date, additional funding where schools deliver services on multiple sites and funding for business rates. There is a mandatory mechanism within the funding formula to limit variations in the amount of funding received by schools from this block. The Minimum Funding Guarantee (MFG) limits the reduction to - 1.5% on per pupil funding and is funded by applying a cap to schools that may have received more funding. The schools guidance clearly outlines that the cap may only be applied to offset the MFG and must be applied consistently for all schools.
- Schools Block (growth fund) – This funding is top sliced from the DSG to support growth in pre-16 pupil numbers to meet basic need and to support additional classes needed to meet the infant class size regulation.

The HNB funds provision for pupils with special educational needs or disabilities (SEND) (0 to 25) as well as a number of other vulnerable groups for example those requiring alternative provision because they are unable to attend mainstream school.

At a very summary level mainstream schools, academies and free schools receive £10k per place where the place is within a Specialist Resource Provision, resourced provision or Pupil Referral Unit (core funding). Where the cost of supporting a pupil cannot be met from the place funding, the Local Authority provides additional 'top up' funding.

The HNB also pays for independent and non-maintained placements where pupils can not be supported in academy or maintained.

The Local Authority agrees a separate per pupil funding for children under the age of five. The Early Years Block supports pupils under the age of five, other than those with SEN, in maintained schools, academies, relevant pupils in private, voluntary and independent providers.

The Central Schools Services Block is a new block for 2018/19, introduced under the national funding formula. This block provides funding for services that schools wish to procure centrally from the Council. Examples include the Admissions Service and a contribution towards the Emotional Health Service. The funding previously formed part of the Schools Block.

The Department for Education (DfE) have stated that funding for “high needs” has risen from £5 billion in 2013 to £6 billion in 2018/9, including an extra £142 million in 2018/9 compared to 2017/8. These increases represent growth in funding of 20% and 2.4% respectively. This is significantly less than the growth in the number of EHCPs which between January 2014 and January 2018 increased by 34.9%. A recent survey of London Councils showed that 27 out of the 33 London boroughs spent more than their Government HNB allocation in 2017/8, and that 29 out of 33 expect to spend more in 2018/9. Nationally the estimate for the HNB spend is £500m more than the Government HNB allocation.

Background and context in Richmond

Richmond is made up of one nursery school, 45 primary schools, 11 secondary schools and two special schools. There are approximately 27,200 pupils who are educated in one of these educational settings in Richmond.

As with most London Boroughs, the Council is facing substantial upward cost pressures on special educational needs and children with disabilities budgets. Richmond has always received a lower level of high needs funding than most other London boroughs, whether this is looked at in per capita 0-25 or on a per EHCP basis. In total Richmond’s high needs grant allocation has increased by 22% since 2013/14 compared to a 39% rise in EHCPs. Officers, schools, councillors and partners have petitioned Government many times for more education funding for all Richmond pupils. This has included Richmond campaigns as well as taking part in London-wide and national campaigns. The funding shortfall has not yet been addressed and the Council have not received any indication from Government to suggest that it plans to increase education funding by the levels required to address the escalating funding gap in Richmond.

In 2014/5, the amount of funding received by Richmond in the HNB allocation represented an amount of £21,800 per EHCP. This compared to the Outer London average of £25,100. Although the HNB allocation has increased every year since then, when viewed on a per EHCP basis, funding has been on a downward trajectory, so that by 2017/8 the HNB allocation had decreased by 8.5% per EHCP in Richmond and by 6.3% in Outer London. During this period, HNB expenditure in Richmond grew from £22.73m to £28.07m, but on a per EHCP basis decreased from £24.2k to £23.4k per EHCP. However because the number of EHCPs was increasing at a faster rate than Government HNB funding allocation, without additional funding being allocated locally, considerable theoretical shortfalls would have materialised in each year.

Current position

In autumn 2017, 2018/9 HNB expenditure was forecast at £29m, essentially 2017/8 actual spend plus £1m for the forecast increase in demand / EHCPs within the system. Given that the Government HNB allocation for 2018/9 is £24.99m, the forecast overspend for 2018/9 was £4m. Also in autumn 2017, the Council decided not to challenge Schools Forum's decision to decline a transfer of funds from the Schools Block to the HNB for 2018/9. The Council could have attempted to overturn this decision via a disapplication request to the Secretary of State.

In addition to actions already in place, for example the opening a new Special Free School in September 2019 (Capella House), a number of additional actions were agreed in January 2018 to seek further reductions in expenditure for 2018/9. The aim at that point was to reduce a theoretical overspend for 2018/9 of £4m to less than £2m. It was not considered realistic to reduce the overspend in 2018/9 to zero.

Detailed proposals

AfC has developed a number of proposed options to be included in the final strategy to address the deficit. These are underpinned by the following principles:

- Resilience: so that families and communities are better able to help, support and protect children without the need for statutory interventions. Particular consideration is needed of how health, social care, wellbeing services and support from the voluntary sector can be delivered in a more integrated way, including how the increase in emotional health needs of children and young people can be met at the earliest opportunity.
- Capacity: so that children and young people can stay closer to their families and support networks in local provision, and benefit from integrated education, health and social care services. This requires more effective planning for specialist local school places for children and young people with special educational needs to ensure, wherever possible, there is a suitable local school place for every pupil. It also needs improved commissioning of placements for children with SEND, as part of the delivery of the local Placement Commissioning and Sufficiency Strategy.
- Inclusion: so that we have more inclusive services and opportunities for children and young people with disabilities, complex needs and challenging behaviours. Mainstream schools need more support to meet the needs of a wider range of children and young people with special educational needs and disabilities. Improved complementary services such as respite care and therapy may also be required.
- Independence: children and young people need to be supported to develop their independence and skills for adulthood. This will need more appropriate accommodation, vocational training, independent living programmes and seamless transitions to adult services so that young people can make a more successful transition to adulthood.
- Resources: to acquire or develop a workforce with the skills to deliver efficient, cost-effective, financially sustainable, and high quality services, fit for the future. Changes and improvements are required across a range of teams, from those working directly with children and young people in schools to those commissioning

places with private providers.

In addition, the key features of the future strategy are likely to be an offer that:

- promotes independence, resilience and mainstream school inclusion.
- prioritises local education placements and an inclusive local community.
- supports strategies to minimise the need for long term interventions.
- focuses on statutory services.
- invests in early intervention where there is clear evidence of the opportunity to improve outcomes and avoid future escalation in cost.
- aligns funding to need.
- ensures all partners share responsibility and pay their fair share.

The proposals have been organised around three themes. These are:

- Re-prioritising funding for schools, so that a greater proportion of funding is allocated to supporting children with special educational needs and disabilities
- Promoting independence, resilience and inclusion
- Promoting local education, and secures better value for money from services provided outside of the borough. The details of the proposals are set out in the table below:

Theme 1: Re-prioritising funding for schools, so that a greater proportion of funding is allocated to supporting children with special educational needs and disabilities

Option 1

The Council would re-prioritise funding so that a greater proportion of schools budgets are allocated towards services for children and young people with SEND.

Rationale

This option would increase the amount of funding available for services for children and young people with SEND during 2019-20, by transferring funding from schools' general budgets. Many local authorities across the country have taken this approach in recent years, and as budget challenges increase, more local authorities are proposing to follow this approach in 2019-20.

This option affects the amount of funding that is passed onto schools, rather than funding that goes direct to pupils, parents/carers or service users. Once funding is passed onto a school it has almost complete discretion on how that funding is used. This means different schools will make different decisions on how the funding is used. This makes it very difficult to assess what impact this option will have on individual pupils. The estimated impact of these options for each of the schools in Richmond has been calculated and is available here: <https://afc-document-portal.org.uk/getFile.aspx?fid=47368&nid=9353>. Should this option be accepted, AfC would also monitor how

	additional funding is used to enhance support for children and young people with SEND.
Option 2	<i>Make savings in the budgets for 'central services', which schools access from the Council, AfC or local health services.</i>
Rationale	<p>This option would reduce the overall 'central services' budget by between 5-10%. This budget funds the following services accessed by schools and/or children, young people and their families:</p> <ul style="list-style-type: none"> • The SEN Team (caseworkers and management). • Speech and language therapy. • Equipment used to support children with SEND. • Educational psychology. • Sensory impairment support. • Support for pupils at risk of permanent exclusion from school or who have been permanently excluded or who are unable to attend school for health reasons. • Outreach / support for groups of children and young people who are vulnerable / underperforming academically. • Virtual School, which coordinates educational support for children in care in Richmond, whether they attend schools in or out of borough. • School admissions team, which coordinate pupil admissions process for maintained schools in Richmond. • School place planning team, which is responsible for planning and commissioning sufficient supply of school places in the borough. • School Performance Alliance Richmond and Kingston (SPARK) - support schools in improving provision, raising standards and narrowing attainment gaps. • 14-19 year old support, which helps to reduce the number of young people who are not in education, employment or training. <p>At this stage, AfC has not proposed how the overall savings target of 5-10% would be broken down by each service. However, as part of the consultation, views are being sought on which of these services the public would strongly oppose having their budgets reduced.</p>
Theme 2: Promoting independence, resilience and inclusion	

Option 1	<i>Improved local offer for young people with SEND aged 16 and over</i>
Rationale	<p>From the perspective of a young person and their family, AfC would aim to improve young people's independence and resilience through:</p> <ul style="list-style-type: none"> ● increased skills training ● more suitable accommodation in the local area ● more employment opportunities. <p>The aim would be to do this through additional investment by the Council and Health partners, as well as improved partnership working with the voluntary, public and private sectors, and parents and carers.</p> <p>From a financial perspective, this would work as an 'invest to save' option: by investing in the support available to young people with SEND aged 16 and over, more young people in residential placements outside of the borough would be encouraged to return to their local community (should it be appropriate and best meet their needs).</p>
Option 2	<i>Further expand our early intervention offer for schools</i>
Rationale	<p>By intervening earlier, the gap in progress and therefore attainment between learners with SEND and their peers would be reduced and their life chances enhanced. The financial impact of this is that the cost of meeting these and future needs will be reduced.</p> <p>Nationally, children and young people with SEND are less likely to be in education, employment or training, and more likely to be excluded from mainstream education. Intervening earlier would improve the lives of the individuals and families involved, as well as save money.</p> <p>AfC has already implemented a range of measures to support this (set out in the detailed analysis of options later in this assessment). The early signs are that these new measures have been working well and therefore via the public consultation, views are being sought on whether AfC should invest more money in expanding these measures further. This would be an 'invest to save' option, through which investing more funding in intervening earlier would save money in the long-term by reducing the risk of needs escalating to the point where more expensive support is required.</p>

Option	<i>Increase capacity to carry out annual reviews of every child or young person's Education Health and Care Plan (EHCP).</i>
Rationale	<p>It is a legal requirement for all children and young people's EHCP to be reviewed every year. The purpose of reviewing each plan is to check whether it still meets the needs of the child or young person, and where possible is focused on encouraging each child and young person to progress towards greater independence and resilience.</p> <p>AfC believe that a more robust annual review process would help to ensure each plan is based on up-to-date evidence, and is more aligned to the evolving needs of children and young people.</p> <p>Although as an organisation AfC is obliged by law to review every EHCP each year, this has been included as an option so as to be as transparent as possible and highlight the likelihood that children and young people with EHCPs are more likely to experience change in their provision than is currently the case, where this is appropriate to their needs. As part of the consultation, AfC is also keen to seek views on how reviews might be carried out as effectively and sensitively as possible.</p> <p>One of the barriers to having a fit-for-purpose annual review process is the time it takes to carry out a meaningful review. AfC have recently recruited an EHCP Annual Review Officer for Richmond, which has increased capacity to carry out effective reviews. We will continue to monitor the effectiveness and timeliness of annual reviews, and may invest in additional posts in the future.</p>
Theme 3: Promoting local education, and secures better value for money from placements outside of the borough.	
Option 1	<i>Increase the availability of local education for children and young people with SEND, and secure better value for money from placements outside of the borough.</i>
Rationale	<p>A key priority of SEND Futures: Our Vision and Priorities for 2020 is to increase the number of local high needs places in schools, to provide more choice and capacity for pupils to be educated locally.</p> <p>AfC have already increased the number of local high needs places over recent years, and recently consulted on detailed proposals to increase these further (https://www.afcinfo.org.uk/pages/local-offer/information-and-</p>

	<p>advice/send-consultation-hub-and-resource-bank/kingston-and-richmond-both-borough-consultations).</p> <p>Where children and young people need to be educated out of the borough in order to meet their needs, the proposals is to introduce a more commercial approach to commissioning places with independent schools. By doing this, the aim is to better control not only placement costs, but also their quality. This might include, for example, doing more joint purchasing with other London councils.</p>
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These proposed options will be reviewed by Richmond Councillors who will decide which to take forward as part of the three year strategy to deliver a balanced budget.

2. Why is the equality assessment being undertaken?

The equality assessment is being undertaken to ensure that the implications of the options being considered by the Council and AfC are fully understood so they can inform the decision-making process.

Results of consultation on the proposals have been included in this assessment.

3. What sources of information have been used in the preparation of this equality assessment? (e.g national research, local needs assessment, user feedback) Please provide the details in the table below:

Information source	Description and outline of the information source
SEND Consultation Hub	Published on the Local Offer website, a summary of consultations with school staff, School Governors, parents/ families and children / young people between March and July 2018, culminating in the SEND Futures Conference.
Richmond Schools' Forum Update on High Needs Block Strategy- September 2018	Update report to the School's Forum in Richmond setting out progress with the strategy to balance the High Needs Block.
London Borough of Richmond upon Thames DSG and HNB- update on strategy for 2019/20 and beyond- August 2018	Briefing note for members in Richmond providing an update on the strategy to address the DSG and HNB deficit for 2019/20 and beyond in August 2018.
London Borough of Richmond upon Thames DSG and HNB- update on strategy for 2019/20 and beyond- September 2018	Briefing note for members in Richmond providing an update on the strategy to address the DSG and HNB deficit for 2019/20 and beyond in September 2018.

SEND Summary Tables- September 2018	SEND data summary report produced in September 2018.
Richmond DSG Three Year Plan- September 2018	AfC document setting out potential options for addressing the DSG/ HNB deficit in Richmond.
DataRich	Data relating to general population and school pupil characteristics provided by Richmond Council.
Department for Education Statistics for Schools and Pupil Numbers	Spreadsheet of information relating to all local authority schools: https://www.gov.uk/government/collections/statistics-school-and-pupil-numbers
Spring School Census 2018	Data from the spring school census in 2018: https://www.gov.uk/guidance/school-census
AfC Annual Equalities Report 2017-18	Annual report setting out how AfC meets the Public Sector Equality Duty.

ANALYSIS OF IMPACT

4. Assess the relevance of each protected characteristic group to the service/ function/ policy/ project and explain what the data, customer feedback, complaints or discussions with stakeholder groups tells you about the impact.

Other questions to consider:

- ***How well are diverse needs met?***
- ***Have any differences in access to services/functions been identified for any group?***
- ***Has the area identified any disadvantages experienced by groups, which need to be addressed?***
- ***Have there been any complaints about a failure to receive an appropriate and fair service?***
- ***Is there any other evidence of differential impact or different outcomes which needs to be addressed?***
- ***Is there any evidence that participation in areas of public life is disproportionately low for any particular relevant protected characteristic group?***
- ***Have the needs of disabled people been identified and addressed where these are different from the needs of non-disabled people?***
- ***Have you identified any need to tackle prejudice or promote understanding between different relevant protected characteristic groups?***

Remember that equality assessment is not simply about identifying and removing negative effects of discrimination but it is also an opportunity to identify ways to advance equality of opportunity and to foster good relations.

NOTE: This assessment presents data relating to children and young people with an EHCP but also to children and young people with SEND but do not meet the threshold to have an EHCP and are registered as SEN Support. Under these circumstances the school (or nursery if aged under 5) is responsible for developing an individual SEN support plan to meet their needs. Every mainstream school has a special educational needs coordinator (SENCO) who is responsible for organising extra help for pupils with SEN. The SENCO works with the class teachers and subject teachers to plan the help each child will receive. The school will give

The data presented is the latest available- for children and young people receiving SEN Support this is from the 2018 spring census.

Protected Group	Findings																																				
Age	<p>EHCPs</p> <p>As at the beginning of September 2018, Richmond was responsible for 1,320 EHCPs.</p> <p>Of these, children aged 5 to 10 have the highest proportion of EHCPs (36.4%) followed by children and young people aged 11 to 15 (33.4%). Only 2.1% are aged 4 and under.</p> <p>The numbers in each age group are set out below:</p> <table> <tr> <th>Age range</th><th>Total</th></tr> <tr> <td>0 to 4</td><td>28</td></tr> <tr> <td>5 to 10</td><td>481</td></tr> <tr> <td>11 to 15</td><td>441</td></tr> <tr> <td>16+</td><td>370</td></tr> <tr> <td>Total</td><td>1,320</td></tr> </table> <p>The next table sets out the numbers of children and young people by school year group:</p> <table> <tr> <th>Year Description</th><th>Number</th></tr> <tr> <td>Nursery 2</td><td>4</td></tr> <tr> <td>Reception</td><td>24</td></tr> <tr> <td>Year 1</td><td>54</td></tr> <tr> <td>Year 2</td><td>90</td></tr> <tr> <td>Year 3</td><td>73</td></tr> <tr> <td>Year 4</td><td>78</td></tr> <tr> <td>Year 5</td><td>89</td></tr> <tr> <td>Year 6</td><td>97</td></tr> <tr> <td>Year 7</td><td>94</td></tr> <tr> <td>Year 8</td><td>83</td></tr> <tr> <td>Year 9</td><td>84</td></tr> </table>	Age range	Total	0 to 4	28	5 to 10	481	11 to 15	441	16+	370	Total	1,320	Year Description	Number	Nursery 2	4	Reception	24	Year 1	54	Year 2	90	Year 3	73	Year 4	78	Year 5	89	Year 6	97	Year 7	94	Year 8	83	Year 9	84
Age range	Total																																				
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	Year 10	84
	Year 11	96
	Year 12	94
	Year 13	82
	Year 14	68
	Age 19+	74
	Age 20+	20
	Age 21+	15
	Age 22+	10
	Age 23+	4
	Age 24+	3
	Total	1,320
	Just 0.3% of children and young people with EHCPs are under school age. 38.3% of children and young people with EHCPs are in reception year to year six (primary school age). 33.4% are in year 7 to year 11 (secondary school age) and 18.5% are in year 12 to year 14 (sixth form age). 9.5% of children and young people are aged 19+.	
	SEN Support	

The 2018 spring census shows that there were 2,284 pupils receiving SEN support in Richmond.

Of these, children aged 5 to 10 are the largest age group receiving SEN support (49.9%) followed by children and young people aged 11-15 (31.2%). Only 3.7% are aged 4 and under.

The numbers in each age group are set out below:

Age Range	Total
0-4	84
5 to 10	1,139
11 to 15	940
16+	121
Total	2,284

The next table sets out the numbers of children and young people by school year group:

Year Description	Number
Nursery 1	3
Nursery 2	39
Reception	81
Year 1	133
Year 2	188
Year 3	221
Year 4	233
Year 5	199
Year 6	182
Year 7	202
Year 8	213
Year 9	195
Year 10	160
Year 11	176
Year 12	29
Year 13	30
TOTAL	2,284

Just 1.8% of children and young people receiving SEN Support are under school age. 54.2% of children and young people receiving SEN Support are in reception year to year six (primary school age). 41.4% are in year 7 to year 11 (secondary school age) and 2.6% are in year 12 to year 13 (sixth form age).

Disability

EHCPs

Between January 2014 and January 2018 in Richmond, the number of children and young people with EHCPs grew from 941 to 1,239, an increase over four years of 31.7%. The average annual increase was 7.2%. Between January 2017 and January 2018, the increase was 3.3% (having been 8.7% in the preceding twelve months). At that point, 10% of Richmond's

EHCPs related to children and young people in National Curriculum Year 14 and above, a cohort who are now included within DSG HNB funding but who were not before the 2014 SEND Reforms.

By September 2018, Richmond was responsible for 1,320 EHCPs. The main presenting need is Autistic Spectrum Disorder (ASD) (28.1%), followed by Speech, Language and Communication Needs (17.6%), and Moderate Learning Difficulty (12.5%). The table below sets out the needs across the cohort of children and young people with SEND:

Special Needs Description	Number
Autistic Spectrum Disorder	371 (48.9%)
Speech, Language and Communication Needs	232 (17.6%)
Moderate Learning Difficulty	165 (12.5%)
Social, Emotional and Mental Health	156 (11.8%)
Specific Learning Difficulty	137 (10.4%)
Physical Disability	76 (5.8%)
Other Difficulty/ Disability	49 (3.7%)
Severe Learning Difficulty	36 (2.7%)
Visual Impairment	24 (1.8%)
Profound and Multiple Learning Difficulty	22 (1.7%)
Hearing Impairment	11 (0.8%)
Multi-Sensory Impairment	10 (0.8%)
Unknown	31 (2.3%)
Total	1,320 (100%)

Within Richmond’s overall school population 2.6% have an EHCP- slightly lower than the national average of 2.9%. 21.2% of pupils with EHCPs do not live in Richmond.

SEN Support

9.3% of pupils in Richmond’s overall school population (2,284 children and young people) receive SEN support compared to 11.7% nationally. At the primary phase, 7.1% of pupils receive SEN support compared to 12.4% nationally. The most common needs for these pupils are:

	<ul style="list-style-type: none"> • Speech, Language and Communication Needs- 24.3%. • Specific Learning Difficulties- 20.1%. • Social, Emotional and Mental Health- 17.7%. • No specialist assessment of need- 12.0%. • Moderate Learning Difficulties- 10.7%. <p>At the secondary phase, 10.9% receive SEN support, compared to 10.6% nationally. The most common needs of these pupils are:</p> <ul style="list-style-type: none"> • Specific Learning Difficulties- 38.1%. • Social, Emotional and Mental Health- 20.7%. • Speech, Language and Communication Needs- 11.6%. • Moderate Learning Difficulties- 8.2%. • Autistic Spectrum Disorder- 6.4%.
Gender (Sex)	<p>EHCPs</p> <p>In September 2018, Richmond was responsible for 1,320 EHCPs. There is a significant gender split with a far higher proportion of EHCPs issued to males (70.9%) than females (29.1%).</p> <p>SEN Support</p> <p>Of the 2,284 children and young people receiving SEN support, 63.0% (1,440) are male and 36.9% (844) are female.</p>
Gender reassignment	The proposals are considered to be of low relevance to gender reassignment.
Marriage and civil partnership	The proposals are considered to be of low relevance to marriage and civil partnership.
Pregnancy and maternity	The proposals are considered to be of low relevance to pregnancy and maternity.
Race/ethnicity	<p>14.0% of residents in Richmond (this total includes 'White Other') are from a Black, Asian or Minority Ethnic (BAME) background. 86.0% of residents in Richmond are White (this includes 'White Other'. Richmond's younger population are more diverse than the population as a whole with 18.8% of those aged 0-19 (compared to 14.0% in all age groups). The 0-19 population is expected to grow by 1.5% by 2035.</p> <p>Between 2001 and 2011, the proportion of Richmond's resident population from BAME groups has increased from 9.0% to 14.0% and growth is expected to continue.</p> <p>EHCPs</p>

	The table below sets out the race/ ethnicity of the 1,320 children and young people with an EHCP:																		
	<table><tr><th>Race/ Ethnicity</th><th>Number (Percentage)</th></tr><tr><td>White</td><td>790 (59.8%)</td></tr><tr><td>Mixed</td><td>87 (6.6%)</td></tr><tr><td>Asian</td><td>64 (4.8%)</td></tr><tr><td>Black</td><td>38 (2.9%)</td></tr><tr><td>Any Other Ethnic Group</td><td>15 (1.1%)</td></tr><tr><td>Chinese</td><td>6 (0.5%)</td></tr><tr><td>Refused/ Not Obtained/ Unknown</td><td>320 (24.2%)</td></tr><tr><td>Total</td><td>1,320 (100%)</td></tr></table>	Race/ Ethnicity	Number (Percentage)	White	790 (59.8%)	Mixed	87 (6.6%)	Asian	64 (4.8%)	Black	38 (2.9%)	Any Other Ethnic Group	15 (1.1%)	Chinese	6 (0.5%)	Refused/ Not Obtained/ Unknown	320 (24.2%)	Total	1,320 (100%)
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	Refused/ Not Obtained/ Unknown	320 (24.2%)																	
Total	1,320 (100%)																		
Of those whose race/ ethnicity is known, 79.0% are White. The next largest group is those of Mixed ethnicity (8.7%) and those who are Asian (6.4%).																			
SEN Support Of the 2,284 children and young people receiving SEN support, 60.2% (1,374) are White British (in total, 73.7% are White including White Other). 39.8% are BAME, a higher proportion than the overall 0-19 population.																			
Religion and belief including non-belief	The proposals are considered to be of low relevance to religion and belief.																		
Sexual orientation	The proposals are considered to be of low relevance to sexual orientation.																		

5. Summarise the key findings of the equality assessments of impact- have you identified any data gaps in relation to the relevant protected characteristics and relevant parts of the duty?

Other questions to consider:

- *Are there findings of unlawful discrimination?*
- *Can you address any identified adverse impact?*
- *Can you mitigate any negative impact?*
- *Please provide rationale if you are unable to address any adverse impact.*
- *Have you identified any ways of advancing equality in this area? For example, meeting diverse needs?*
- *Is there a need for any actions to promote understanding between different protected groups?*

Overall assessment of impact

As noted previously, to meet current demand, AfC have had to spend more than the funding available. It is forecast that the current level of spending continues, a deficit of £13 million for schools will have accumulated by 31 March 2019. If the current level of increasing demand for high needs support continues without action to reduce costs or increase funding, the deficit will continue to rise significantly.

It is not sustainable to continue spending more than is received, so AfC has developed these options with the Council for consideration by Richmond elected members. The options set out in this equality assessment seek to address the deficit and to create a more inclusive, local and targeted SEND education offer by intervening early and supporting schools to be able to better meet the needs of their SEND pupils, while encouraging resilience and independence.

Detailed assessment of impact

In addition to an assessment of the overall impact of AfC's strategy for addressing the financial deficit, more detailed assessment of the impact of each of the proposed options is set out below:

Proposal	Impact
Theme 1: Re-prioritising funding for schools, so that a greater proportion of funding is allocated to supporting children with special educational needs and disabilities	
The Council would re-prioritise funding so that a greater proportion of schools budgets are allocated towards services for children and young people with SEND.	<p>If this option was to be agreed, schools would receive a reduced amount of funding for mainstream pupils. This would include those receiving SEN support.</p> <p>However, the MFG would mean that funding could only be reduced by a maximum of 1.5% per pupil, so it is not anticipated that any impact on pupils would be significant.</p>
Make savings in the budgets for 'central services', which schools access from the Council, AfC or local health services.	<p>The intention would be to undertake service redesigns on the services that are funded by the central services block. This includes admissions, governor support, emotional health services and family support.</p> <p>If this option was accepted, equality assessments would be completed for each of the service redesigns to assess impact.</p> <p>The possible implications of reducing the overall budget for central services, is that schools and service users may notice a reduction in the availability and/or quality of service. It may also have a knock on effect of increasing the number of appeals from families and/or SEN Tribunals.</p>
Theme 2: Promoting independence, resilience and inclusion	

<p>Improved local offer for young people with SEND aged 16 and over</p>	<p>The proportion of learners with an EHCP who are aged over 16, and particularly over 19, has risen since the Children and Families Act raised the relevant upper statutory age to 25 years in 2014. Interestingly the current SEND Parliamentary Inquiry contains not only a specific line of focus on the level and distribution of funding for SEND, but also another on provision for 19-25 year olds including support for independent living; transition to adult services; and access to education, apprenticeships and work.</p> <p>Part of the intended aim of this option is to provide a viable option to young people in residential placements outside of the borough to return to their local community, should it be appropriate and best meet their needs, through the provision of an improved post-16 offer.</p> <p>The local offer will be enhanced to provide more employment opportunities, increased skills training, more suitable accommodation, and greater support so that young people are able to develop their independence skills. The young people will be able to live in the area that they know and close to family and friends and support networks.</p> <p>For example, AfC will continue to work with providers to develop the range of options available for Richmond learners with an EHCP who are 16 years and over. Interviews are taking place with all Year 11 students with an EHCP, and going forward this will happen during Years 9 or 10. The aim of these interviews is to provide more informed and proactive pathway planning not only into schools and colleges but also into other more vocational pathways such as apprenticeships and supported apprenticeships. This will allow placements to be more aligned to the longer term objectives of the particular young person, including to support their journey to independence as they transition into adulthood. The additional financial benefit of this is that it is expected that a reduced proportion of these learners will have their placements funded from the DSG, as many of these alternatives receive funding from different sources. AfC appointed a specific member of staff (shared between Richmond and Kingston) to lead on this last academic year. This will also allow more coordinated and planned transitioning of young people into adult and other relevant services such as supported housing.</p> <p>This would likely impact on those children and young people</p>
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	who are currently aged over 16 (370) and all other children and young people when they reach 16.
Further expand our early intervention offer for schools	<p>There is a need to identify earlier and intervene more quickly for children and young people with SEND in schools. The result of this will be that the progress and therefore the attainment gap between learners with SEND and their peers without will be minimised and their life chances enhanced. The financial impact of this is that the cost of meeting these and future needs will be reduced, benefitting not just the DSG but wider services too. Children and young people with SEND are nationally disproportionately represented in exclusion, Not in Education, Employment or Training (NEET) and youth crime data. Earlier intervention will not only save money, but it will also improve the lives of the individuals and communities involved.</p> <p>This option is therefore focused on ensuring there is sufficient support in place at an early stage for children so that they may never need to be issued with an EHCP to access the support they need to thrive. The emphasis would be on training and equipping staff in schools to better support the needs of children and young people with SEND, without the need for an EHCP assessment. This may lead to an increase in the number of pupils receiving SEN support and a slow down in the number of EHCPs being created.</p> <p>AfC would continue to provide advice, guidance and training so that school staff feel more confident to accommodate the needs of their pupils in a mainstream setting. For example, School INSET days now include SEND training on an even more frequent basis, the promotion of Quality First Teaching principles is becoming even more widespread, and local networks for sharing specialist best practice and providing outreach support have become more established with the intention of becoming more active than they currently are. There are also a number of other initiatives being used to take this agenda forward. These include promotion at Headteacher Partnership, School Improvement and SENCO Forum meetings. Some individual schools and multi academy trusts are already taking this agenda forward with increases in their staff SEND training, and this proactivity needs to become universal.</p> <p>If this option was accepted, it would be supported by the following actions:</p>

	<ul style="list-style-type: none"> ● Three early intervention panels (one each for Early Years, Primary and Secondary) have been established to sit five or six times per year. These panels will consider individual cases where class teacher, SENCO, SEN Threshold Guidance and other interventions (accessed for example via the “SEND Support Map” due to be launched in July) have been tried without sufficient success, and an escalation of support is seen as required. The panels will be able to assign a range of additional interventions to support the school and young person, without the need for an EHCP. Possible interventions will include support from specialist inclusion, educational psychology, clinical psychology, and therapy staff. Resources funded by the Early Years Inclusion Fund may be considered, as will outreach support provided by specialist resource provisions and special schools. Schools will be able to apply for extra support on a half-termly basis which would provide a quicker route to accessing support as the EHCP assessment process can take 20 weeks. ● There is now an inclusion “one stop shop” available to all schools via telephone 9am to 4pm providing expert advice and signposting to additional support. ● Support networks are available on social emotional and mental health (SEMH), with training provided by the Inclusion Service, the Educational Psychology Service and the Emotional Health Service (clinical psychology). The Inclusion Service will include secondary behaviour specialists in addition to the current primary expertise, offering advice, training, coaching and the coordination of multi agency networks. ● Peer to peer audits of SEND practice are being established so that schools within the borough can support one another to become more inclusive and more equipped to meet the needs of pupils with SEND. The schools demonstrating the strongest SEND practice will support those schools requiring more support and help them to undertake an accurate and credible self-assessment. <p>As part of this option, further work would also be undertaken to engage with voluntary sector organisations to identify if they would be able to provide more support to schools too.</p> <p>It is difficult to quantify how many children and young people</p>
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	<p>this may impact upon but it should ensure that resources are directed at those children and young people that need it most and that schools are more competent and confident to support pupils with SEND, whether they have an EHCP or not. Currently, there are 2,284 children and young people who receive SEN support.</p>
<p>Increase capacity to carry out annual reviews of every child or young person's Education Health and Care Plan (EHCP).</p>	<p>All EHCPs are subject to a formal annual review process. The objective of this process is to review whether the EHCP needs to be amended in any way, including whether it is still required. AfC believe that a more robust annual review process would result in more amendments being made to the content of an EHCP at this point in the annual cycle, and that the support provided each year would be more evidence based and bespoke to the evolving needs of the learner. Achieving for Children also believe that the financial impact of this, net of the investment cost, would be a reduction in expenditure. AfC have recently recruited an EHCP Annual Review Officer for Richmond, who will lead on this work, and are currently recruiting for an Annual Review coordinator position. The intention will be to ensure that the EHCPs that we produce are still effective and relevant and focused on encouraging each child and young person to progress towards greater independence and resilience wherever possible.</p> <p>In some cases, an annual review could lead to a reduction in support where the evidence shows that the child or young person no longer needs the existing level of support. In other cases, it could lead to an increase in support for a child or young person, where existing support is not considered to be sufficient. Parents, carers and children and young people will still have the same rights to appeal, should they disagree with changes proposed through the annual review process.</p> <p>This has the potential to impact on all children and young people with an EHCP.</p>
<p>Theme 3: Promoting local education, and secures better value for money from placements outside of the borough.</p>	
<p>Increase the availability of local education for children and young people with SEND, and secure better value for money from placements outside of the borough.</p>	<p>There is already considerable focus on ensuring sufficient local places for children and young people with SEND. In March 2018, AfC led a consultation proposing a range of expansions of existing provision for children and young people with SEND, with an additional 126 places being created across the age ranges (the consultation can be found here: https://www.afcinfo.org.uk/pages/local-offer/information-</p>

	<p>and-advice/send-consultation-hub-and-resource-bank/kingston-and-richmond-both-borough-consultations). In addition, there are plans to provide more Specialist Resource Provision (SRP) places, which are bespoke spaces within mainstream schools with their own specialist staff, so that pupils with SEND can be educated locally and benefit from being within a mainstream school. The intention is to create an additional 44 places over the next three years in addition to the recent creation/ expansion of SRPs in the borough at six schools. This would enable AfC to offer out of borough pupils the opportunity to be educated closer to their family, friends and support networks.</p> <p>Over the next few years as the new places are created, this has the potential to impact on 170 children and young people (number of new places) by providing more local school places, closer to home.</p> <p>AfC is also seeking to adopt an even more commercial approach to commissioning places with independent schools. The commissioning of specialist places is already subject to a number of changes. New contracts have now been issued to all independent special schools. These will deliver enhanced quality and price control for AfC. Price negotiations continue with providers.</p> <p>AfC have appointed a specialist SEND Commissioning Officer (shared with Kingston) as part of the existing commissioning team to give the focus and priority this number of placements and volume of spend warrants. The aim is to better control not only placement costs but also their quality. This would involve a more forensic breakdown of charges, outcomes-based commissioning, new contracts and a more proactive relationship management with key suppliers to negotiate more effectively.</p> <p>This is unlikely to have an impact on any children or young people as it is more focused on the relationship between AfC and the independent schools.</p>
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CONSULTATION

6. What consultation have you undertaken with stakeholders or critical friends about the key findings? What feedback did you receive as part of the consultation?

Consultation on options

The proposals are due to be considered as part of the Schools Budget setting process for financial year 2019/20 to be finalised at Cabinet on 14th February 2019. Related consultation and engagement with schools and other stakeholders has been ongoing for more than twelve months, and has taken a range of forms including Schools Forum meetings, consultation meetings, workshops and an online survey with parents and carers and parent carer groups. Most notably these took place in autumn 2017 as part of the 2018/19 budget setting process, in April to July 2018 as part of the SEND Futures programme and development of a "SEND Vision for 2020", and in October and November 2018 as part of the 2019/20 budget setting process.

Most recent stakeholder engagement and consultation include:

Audience		Method	Dates	Participants	Notes/ Summary at Annex
1	Early Years providers	Online	24/10 to 14/11	24	Sent to 183
2	Schools	Online	19/10 to 14/11	29	Sent to 58
3	Workshops with Richmond schools and Early Years Providers	Workshops x 2	16/10 and 15/11	47	55 booked to attend
4	Public consultation	Online survey	26/10 to 25/11	158	
5	Public consultation	Drop in meetings x 3	16/11 pm 19/11 am 20/11 eve	14	49 booked to attend
6	Children and young people	Focus group	11/18	8	November
7	Children and young people	Focus groups and survey	Summer 2018	16 25	

Summary of main themes arising in feedback

The key themes arising across all our consultation activity are:

Theme 1: Re-prioritise funding

Block transfers

- Respondents were split in their views on the proposal to transfer funds from the schools block to the high needs block (schools: 48% in favour, 45% not).
- Respondents raised concerns that the proposed block transfer would impact negatively on teaching and learning for all children and be difficult for schools to absorb due to existing funding pressures.

- Transfer between blocks was seen by many responders as unlikely to have an impact in the long term.
- A number of parents commented that they found it difficult to choose which block, and therefore children, should receive the funding - all children should have sufficient funding.
- A number of respondents asked for the Council to lobby central government for more funding, and to enable local parents to add their voices to the lobbying.

Savings from central services budget funded from High Needs Block

- Respondents felt that the impact of losing some or all of the services outlined would have a disproportionately negative impact on schools for the minimal amount of potential savings.
- A number of respondents agreed that if efficiencies can be made without impact service delivery this should be a priority.
- Caseworkers must have enough capacity to know the children and young people that they are working to support.

Early years hourly rate freeze

- The majority of early years providers responding to the survey forecasted a 'medium' (62%) impact of a freeze in the hourly rate.
- Some respondents felt the impact on individual providers would be low if it was applied consistently to all providers.

Theme 2: Resilience

Improved post-16 offer

- There was broad agreement that a better post-16 offer is needed.
- Parents/carers responded that support during transitions is crucial, including better joined up working between children and adults' services.
- Young people told us that that school should teach them more practical skills that will be useful in their adult lives.
- Young people also told us that school should talk to them more about jobs and what they want to be when they are adults, and offer a week's work experience for all pupils in years 10 and 11.

Early intervention

- The majority of respondents agree with proposals on early intervention.
- Some respondents commented that early intervention cannot take the place of statutory provision, as this would be unlawful.
- To be successful, early intervention initiatives must be sufficiently resourced; it is difficult in the context of budget pressures in schools - particularly therapies (occupational, speech and language and music)
- Many also feel that more evidence of the impact of early intervention must be developed before further investment of scarce resources can be made
- Early intervention initiatives should build on local expertise and include developing strong partnerships with the community and voluntary sector.
- Early intervention should include outreach for nurseries, including Private, Voluntary and Independent nurseries (PVIs).

Statutory assessments and annual reviews

- More should be done to support parents to understand the process and the system
- More training is required for all professionals taking part in the assessment and annual review processes, particularly focussing on standards of evidence of impact
- Improvements should be made to the statutory assessment process - some families reported that they have relied on private assessments that are then not considered. This should also reduce the rate of appeals
- All young people who took part in our consultation exercises felt that they should have copies of their plans, only two (of eight) said that they had contributed their views to the plan
- There is broad support for investing in the annual review process, as this is a statutory duty
- The needs of children and young people must be the starting point for annual reviews, not a funding cut target
- Most of the young people who took part in our consultation exercises had not attended their annual reviews. The young people who had attended found it to be a negative experience.

Theme 3: Promoting local education

- Young people told us that Learning Support Assistants are helpful and kind, but there are not enough of them
- Young people also told us that physical access to buildings is generally good but PE lessons are not inclusive and they can spend a lot of time “watching”
- The majority of respondents agreed with proposals to improve commissioning with independent, non maintained and academy special school providers
- Must be done in conjunction with developing our local offer so that suitable, positive alternatives are available
- Well funded and sufficient therapy provision is crucial to meet need and gain parents’ confidence in the local offer
- An inclusive ethos is needed across the Borough so that all schools are contributing to supporting local children and young people with special educational needs.

Process

Some respondents raised concerns about the survey and consultation process. Key points were:

- Insufficient information was provided on some questions to enable respondents to make an informed decision
- Achieving for Children is not able to act impartially in this matter because it will benefit from decisions to make further investment
- Insufficient controls on who completes the survey will mean that there can be no confidence that the responses are reflective of the views of residents
- Some questions in the survey are leading
- The proposals do not appear to be based on a forensic understanding of need.

The full results from the consultation will be included in the report that is considered by Richmond Councillors.

Consultation on the equality assessment

The equality assessment has been shared for comment with the Richmond Council equalities lead and the chair of the Richmond Council External Stakeholders Scrutiny Group (ESSG). Amendments and additions have been made as part of this feedback. The equality assessment will also be discussed at an upcoming ESSG meeting in Richmond in December 2018. Furthermore, it has been reviewed by a number of senior officers in AfC to ensure it is robust and comprehensive and provides a full picture of the potential impact of these proposals.

ACTION PLANNING

7. What issues have you identified that require action?			
<i>Issue identified</i>	<i>Planned action</i>	<i>Lead officer</i>	<i>Completion Date</i>
Maintaining strong relationships between Richmond Council, AfC and Richmond schools	AfC will continue to work with the Schools Forum to ensure positive relationships are maintained, even if the proposals are not fully supported by the majority of schools	Director of Finance	Ongoing
Ensuring parents and parent representatives are informed	AfC will continue to engage with the Parent/ Carer Forum to ensure parents and parent representatives are kept informed of the developments in SEND provision in Richmond.	AfC Programme Director	Ongoing
Need for greater consideration of intersectionality (children and young people who fit within more than one of the protected characteristic groups)	As part of the AfC annual equality report, consider intersectionality with regard to children and young people with disability	Head of Strategy and Programmes	April 2018

MONITORING AND REVIEW

8. How will the actions identified above be monitored and reviewed and where will the actions be captured i.e. Business Plan, project plan, service and improvement plan, service plan poster or Personal Development Plan?

The issues above will be monitored as part of the implementation of the Schools Budget process, or in the AfC annual equalities report as referenced above.

PUBLISHING THE COMPLETED ANALYSIS

When completed, the equality assessment should be approved by a member of AfC Management Team and published on the Achieving for Children website. Please provide details below:	
Approved by	Ian Dodds, Interim Chief Executive
Date of approval:	November 2018
Date of publication:	TBC