

**PROPOSAL TO RECONFIGURE EXISTING SERVICES TO SCHOOLS TO SUPPORT THEM TO MEET THE NEEDS OF PRIMARY-AGED CHILDREN WITH SPECIFIC LEARNING DIFFICULTIES (SpLD) BY 31 MARCH 2019**

**EQUALITIES IMPACT ASSESSMENT (EQIA)**

**SPLD BASE CLOSURES**

**STEP 1: Responsibility and involvement**

<p><b>Title of proposal/ project/strategy/ procurement/policy</b></p>	<p>Proposal to re-configure existing services to schools to support them to meet the needs of primary aged children with Specific Learning Difficulties (SpLD) by 31 March 2019. This includes the closure of 10 SpLD Outreach Primary Bases in the following schools:</p>	<p><b>Head of Service or Business Manager</b></p>	<p>Jennie Newman</p>
	<p>Applecroft Primary, 14 Applecroft Rd, Welwyn Garden City AL8 6LA          Bonneygrove Primary, Dark Ln, Cheshunt, Waltham Cross EN7 5ED          Grange Junior Sparhawke, Letchworth Garden City, SG6 4PY          Laurance Haines Primary, Vicarage Rd, Hertfordshire, Watford WD18 0DD          Maple Grove Primary, St Agnells Ln, Hemel Hempstead HP2 7BG          Parkside Primary, Aycliffe Rd, Borehamwood WD6 4EP          The Leys Primary, 207 Ripon Rd, Stevenage SG1 4LR          The Thomas Coram Jr. Swing Gate Ln, Berkhamsted HP4 2RP          Thorley Hill Primary, Park La, Bishop's Stortford CM23 3NH          Windermere Primary, Windermere Ave, St Albans AL1 5QP</p>	<p><b>Lead officer contact details:</b></p>	<p>David Canning 01442 454160</p>
<p><b>Names of those involved in completing the EqIA:</b></p>	<p>Phil Brunt &amp; Tom Stacey</p>		

<b>Date completed: Reviewed:</b>	30 November 2017 10 January 2018	<b>Review date: Reviewed:</b>	15 March 2018 30 April 2018
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**STEP 2: Objectives of proposal and scope of assessment – what do you want to achieve?**

<p><b>Proposal objectives:</b>          –what you want to achieve          –intended outcomes          –purpose and need</p>	<p>Following a review of existing SpLD provision at primary and secondary bases considered at County SEND Executive, it is proposed to close the SpLD primary bases at the Schools listed above, with the needs of the majority of students experiencing SpLD being met through the support arrangements and delegated resources available in all schools by class teachers. Where needed, additional advice and support would come from the schools' SENCO. Individually allocated pupil led funding will be available for the very small number of students with higher level (exceptional) needs requiring support over and above the schools' ordinarily available provision.</p> <p>Class teachers, teaching assistants and SENCOs will continue to be supported by the SpLD Outreach service, based at three HCC buildings (Apsley, Farnham House and County Hall) with a central team leader to ensure a consistent approach across the county.</p> <p>Individually allocated pupil led funding will be available for the very small number of students with higher level (exceptional) needs requiring support over and above the schools ordinarily available provision.</p> <p>Consequently, a consultation ended 20 December 2017 on the proposals to reconfigure existing services to schools to support them in meeting the needs of primary aged children with Specific Learning Difficulties (SpLD) by 31 March 2019.</p> <p>The vast majority of students identified with SpLD in Hertfordshire currently have their needs met in their local mainstream schools with outreach support from a number of bases across the county. A review has identified that an enhanced service can be provided in a different way. If this were to go ahead it will require the closure of the bases (listed above).</p> <p>Specifically the proposals are to reconfigure staffing into four teams as part of the Special Education Needs and Disability (SEND) Special Advice and Support Service under the overall line management of the County Lead for</p>
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	<p>Specialist Advice and Support. This will enhance the current offer with additional expertise from within the central service which includes staff with higher levels of SpLD training and expertise.</p> <p>To do this it will be necessary to close the SpLD Outreach Bases located in the schools listed above on 31 March 2019 and to provide support for students from staff working out of the 4 Integrated Services for Learning (ISL) areas based in the 3 County Locations; Farnham House, County hall and Apsley.</p>
<p><b><u>Stakeholders:</u></b> Who will be affected: the public, partners, staff, service users, local Member etc.</p>	<p>Parents/carers/pupils, staff and governors at all schools in Hertfordshire, including those with the SpLD bases located within; Local Pre-Schools, Nursery, Primary, Secondary and Special schools; MPs, County Councillors, District Councillors, Parish and Town Councils and Local Authority Chief Executives; Trade Union representatives; Church Diocese representatives; NHS representatives; Parent Governor representatives on the Overview and Scrutiny Committee at Hertfordshire County Council; Pre-schools, playgroups, Children’s Centres, toddler groups and day nurseries; Libraries and Citizen’s Advice Bureaux; Senior officers in Hertfordshire County Council’s Children’s Services department and in Herts Property Services</p>

**STEP 3: Available data and monitoring information**

<b>Relevant equality information</b>	<b>What the data tells us about equalities</b>
<p>For example: Community profiles / service user demographics, <a href="#">data</a> and monitoring information (local and national), similar or previous EqlAs, complaints, audits or inspections, local knowledge and consultations.</p>	<p>A public consultation was undertaken from 2 October 2017 ended on 20 December 2017.</p> <p>Consultation letters were provided to staff, parents, pupils and governing bodies of all Hertfordshire schools and other key stakeholders, including local members, parish councils, local schools and nurseries, the Roman Catholic and Church of England Dioceses, community groups and relevant staff at Hertfordshire County Council.</p> <p>The consultation was also on the Hertfordshire County</p>

	<p>Council website, Hertfordshire.gov.uk, and the consultation documents were made available in other formats on request, including large print, braille and other languages.</p> <p>At the conclusion of the consultation all responses will be carefully considered and where issues are raised regarding Disability they will be considered as part of upcoming EqIA's.</p>
<p>January 2017 school census data on gender split, English as an additional language (EAL), ethnicity, free school meal (FSM) eligibility, number of children with SEN statements, SEN Provision or who have Education Health Care Plans.</p>	<p><b>January 2017</b> school census data</p> <p>See appendix 1 attached.</p>

**STEP 4: Impact Assessment – Service Users, communities and partners (where relevant)**

**Guidance on groups of service users to consider within each protected group can be found [here](#)**

<b>Protected characteristic</b>	<b><a href="#">Potential for differential impact</a> (positive or negative)</b>	<b>What reasonable mitigations can you propose?</b>
<b>Age</b>	The proposals would only affect children of primary school age, as the proposal only concerns the SpLD service at primary level.	It is proposed that the level of support at tiers 2 and 3 which the SpLD Outreach service will deliver to staff and students at all Hertfordshire schools will be unchanged.
<b>Disability Including Learning Disability</b>	The proposals would only affect primary school pupils who either require direct support from the SpLD outreach service or whose teacher/TA is supported by the SpLD Outreach service. Some of these children may have disabilities or learning disabilities.	It is proposed that the level of direct support at tiers 2 and 3, which the SpLD Outreach service will deliver to staff and students at all Hertfordshire schools will be unchanged.

Protected characteristic	<u>Potential for differential impact (positive or negative)</u>	What reasonable mitigations can you propose?
<b>Race</b>	It is not anticipated that the proposals will affect people disproportionately because of their race.	No mitigation is currently required but the position will continue to be monitored and if any issues in respect of the protected characteristic are identified then the Action Plan will be amended accordingly.
<b>Gender reassignment</b>	It is not currently anticipated that the proposals will affect people with this characteristic disproportionately.	No mitigation is currently required but the position will continue to be monitored and if any issues in respect of the protected characteristic are identified then the Action Plan will be amended accordingly.
<b>Pregnancy and maternity</b>	It is not currently anticipated that the proposals will affect people with this characteristic disproportionately.	No mitigation is currently required but the position will continue to be monitored and if any issues in respect of the protected characteristic are identified then the Action Plan will be amended accordingly.
<b>Religion or belief</b>	It is not anticipated that the proposals will affect people disproportionately because of their religion or belief.	No mitigation is currently required but the position will continue to be monitored and if any issues in respect of the protected characteristic are identified then the Action Plan will be amended accordingly.
<b>Sex</b>	It is not anticipated that the proposals will affect people disproportionately because of issues around sex.	No mitigation is currently required but the position will continue to be monitored and if any issues in respect of the protected characteristic are identified then the Action Plan will be amended accordingly.
<b>Sexual orientation</b>	It is not anticipated that the proposals will affect people disproportionately because of issues around sexual orientation.	No mitigation is currently required but the position will continue to be monitored and if any issues in respect of the protected characteristic are identified then the Action Plan will be amended accordingly.
<b>Marriage &amp; civil partnership</b>	It is not anticipated that the proposals will affect people disproportionately because	No mitigation is currently required but the position will continue to be monitored and

Protected characteristic	<u>Potential for differential impact (positive or negative)</u>	What reasonable mitigations can you propose?
	of issues around marriage and civil partnership.	if any issues in respect of the protected characteristic are identified then the Action Plan will be amended accordingly.
<b>Carers (by association with any of the above)</b>	It is not anticipated that the proposals will affect people disproportionately because of issues around caring responsibilities.	No mitigation is currently required but the position will continue to be monitored and if any issues in respect of the protected characteristic are identified then the Action Plan will be amended accordingly.
<b>Opportunity to advance equality of opportunity and/or foster good relations</b> (Please refer to the <u>guidance</u> for more information on the public sector duties)		
<p>The proposed changes will further embed the expectation that local settings can and do cater for all but the most exceptional needs of young people. A programme of advisory teacher support, together with a funded accredited training scheme has been available over time to promote embedding of local knowledge, skills and experience to ensure young people are enabled and empowered to learn within their local school / community.</p> <p>Wherever possible the needs of a young person should be addressed within their local community at their local mainstream setting. Children experiencing additional (special educational) needs benefit from opportunities to be educated alongside their peers, fostering peer acceptance and positive self-image and enabling them to develop local friendships.</p>		

#### Impact Assessment – Staff (where relevant)

Protected characteristic	<u>Potential for differential impact (positive or negative)</u>	What reasonable mitigation can you propose?
<b>Age</b>	It is not anticipated that the proposals will affect people disproportionately because of their age.	No mitigation is currently required but the position will continue to be monitored and if any issues in respect of the protected characteristic are identified then the Action Plan will be amended accordingly.
<b>Disability Including Learning Disability</b>	It is not anticipated at this stage that the proposals will affect people disproportionately because of the issues of disability.	No mitigation is currently required but the position will continue to be monitored and if any issues in respect of the protected characteristic are identified then the Action Plan will be amended accordingly.

Protected characteristic	<u>Potential for differential impact (positive or negative)</u>	What reasonable mitigation can you propose?
		Any issues identified or known as well as the duties found within Part 6, Section 149 and Schedules 10 and 13 of the Equality Act 2010 will be taken into account.
<b>Race</b>	It is not anticipated that the proposals will affect people disproportionately because of their race.	No mitigation is currently required but the position will continue to be monitored and if any issues in respect of the protected characteristic are identified then the Action Plan will be amended accordingly.
<b>Gender reassignment</b>	It is not anticipated that the proposals will affect people disproportionately because of their gender reassignment.	No mitigation is currently required but the position will continue to be monitored and if any issues in respect of the protected characteristic are identified then the Action Plan will be amended accordingly.
<b>Pregnancy and maternity</b>	It is not anticipated that the proposals will affect people disproportionately because of their pregnancy and maternity.	No mitigation is currently required but the position will continue to be monitored and if any issues in respect of the protected characteristic are identified then the Action Plan will be amended accordingly.
<b>Religion or belief</b>	It is not anticipated that the proposals will affect people disproportionately because of their religion/belief.	No mitigation is currently required but the position will continue to be monitored and if any issues in respect of the protected characteristic are identified then the Action Plan will be amended accordingly.
<b>Sex</b>	It is not anticipated that the proposals will affect people disproportionately because of issues around sex.	No mitigation is currently required but the position will continue to be monitored and if any issues in respect of the protected characteristic are identified then the Action Plan will be amended accordingly.
<b>Sexual orientation</b>	It is not anticipated that the proposals will affect people disproportionately because of issues around sexual orientation	No mitigation is currently required but the position will continue to be monitored and if any issues in respect of the protected characteristic are identified then the Action Plan

Protected characteristic	<a href="#">Potential for differential impact (positive or negative)</a>	What reasonable mitigation can you propose?
		will be amended accordingly.
<b>Marriage &amp; civil partnership</b>	It is not anticipated that the proposals will affect people disproportionately because of issues around marriage and civil partnership	No mitigation is currently required but the position will continue to be monitored and if any issues in respect of the protected characteristic are identified then the Action Plan will be amended accordingly.
<b>Carers (by association with any of the above)</b>	It is not anticipated that the proposals will affect people disproportionately because of issues around caring responsibilities.	No mitigation is currently required but the position will continue to be monitored and if any issues in respect of the protected characteristic are identified then the Action Plan will be amended accordingly.
<b>Opportunity to advance equality of opportunity and/or foster good relations</b> (Please refer to the <a href="#">guidance</a> for more information on the public sector duties)		
<p>The SpLD advisory teachers would become part of the Specialist Advice and Support Service. They would spend the majority of their time visiting and providing services to schools and targeted and specialist work with children. They would have the benefit of being part of the four local ISL teams. Initially SpLD teachers will be allocated across the county using model indicator data to ensure fair and equitable distribution of resources.</p> <p>The service will further develop the principles of outreach in line with the Specialist Advisory Teacher model delivered by Integrated Services for Learning (ISL).</p> <p>Reasonable steps will be taken to avoid compulsory redundancies should this be necessary. Where compulsory redundancy cannot be avoided individuals would be identified from a relevant pool of staff following the application of selection criteria confirmed during consultation with employee representatives (trade unions/professional associations).</p> <p>Existing libraries of resources are proposed to be available on short term loans to local settings, as are other special needs resources in localities.</p>		

### STEP 5: Gaps identified

Gaps identified Do you need to collect more data/information or carry out consultation? (A 'How to engage' consultation guide is on Compass). How	When the consultation has been completed the responses will be considered and should the issues raised require further data, the EqlA will be updated before moving forward to the statutory phase.
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will you make sure your consultation is accessible to those affected?	
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### STEP 6: Other impacts

Consider if your proposal has the potential (positive and negative) to impact on areas such as health and wellbeing, crime and disorder and community relations. There is more information in the guidance.

It is not considered that the proposal will have any other impact.

### STEP 7: Conclusion of your analysis

Select one conclusion of your analysis	Give details
<input checked="" type="checkbox"/> <b>No equality impacts identified</b> – No change required to proposal.	The proposal could impact any primary-aged pupil who currently or in the future access the SPLD Outreach service. As the proposed reconfiguration intends to maintain the same level of service to all staff and pupils, there will be no impact on either.
<input type="checkbox"/> <b>Minimal equality impacts identified</b> – Adverse impacts have been identified, but have been objectively justified (provided you do not unlawfully discriminate). – Ensure decision makers consider the cumulative effect of how a number of decisions impact on equality.	
<input type="checkbox"/> <b>Potential equality impacts identified</b> – Take ‘mitigating action’ to remove barriers or better advance equality. – Complete the action plan in the next section.	

Select one conclusion of your analysis	Give details
<input type="checkbox"/> <b>Major equality impacts identified</b> <ul style="list-style-type: none"> <li>– Stop and remove the policy.</li> <li>– The adverse effects are not justified, cannot be mitigated or show unlawful discrimination.</li> <li>– Ensure decision makers understand the equality impact.</li> </ul>	

### STEP 8: Action Plan

Issue or opportunity identified relating to:	Action proposed	Officer Responsible and target date
<ul style="list-style-type: none"> <li>– Mitigation measures</li> <li>– Further research</li> <li>– Consultation proposal</li> <li>– Monitor and review</li> </ul>		
Future provision for students with SpLD	<p>It is proposed that class teachers, teaching assistants and SENCOs will continue to be supported by the SpLD Outreach service. The SpLD outreach teams will be based at three HCC buildings (Apsley, Farnham House and County Hall) with a County Wide team leader to ensure a consistent approach across the county.</p> <p>Individually allocated pupil led funding will be available for the very small number of students with higher level (exceptional) needs requiring support over and above the schools ordinarily available provision.</p>	David Canning, 1 September 2018 onwards

#### This EqIA has been reviewed and signed off by:

**Head of Service or Business Manager:** Jennie Newman      **Date:** 22 May 2018

**Equality Action Group Chair:**      **Date:**

HCC's Diversity Board requires the Equality team to compile a central list of EqIAs so a random sample can be quality assured. Each Equality Action Group is encouraged to keep a forward plan of key service decisions that may require an EqIA, but please can you ensure the Equality team is made aware of any EqIAs completed so we can add them to our list. (Email: [equalities@hertfordshire.gov.uk](mailto:equalities@hertfordshire.gov.uk)).