

Please refer to the guidance on mySCC to help you complete this EIA Screening or speak to a member of the EIA Review Group.

Note: EIAs are published on the SCC website, so ensure content is appropriate.

An EIA helps us to demonstrate how we are meeting our statutory Public Sector Equality Duty which requires us to pay “due regard” to the impact of our decisions on people with **protected characteristics** in setting and implementing policies or developing services.

The law does not mean that no changes can be made, even if they have a negative effect on people. However, we must demonstrate that we have considered the impact that could happen and what steps we have put in place to mitigate against any negative impacts.

In addition, you should consider the impact of living in a **rural area** as part of this assessment. Where people live is not a characteristic protected by law, but SCC feels it is good practice to consider carefully how location may affect people’s experience of a policy or service.

| Details  |   |
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| <b>Name of the service or policy title</b>   | Children and Young Peoples Directorate – Inclusive Services   |
| <b>Lead officer</b> ( <i>responsible for the policy or service</i> )   | Judith Mobbs  |
| <b>Officers carrying out the screening</b><br>( <i>at least one must have done EIA training and it is recommended that an officer responsible for the policy or service is involved in the screening</i> ) | Joy Stodart   |
| <b>Is this new or a revision?</b> ( <i>If revision state when the EIA(s) for this topic had previously been done</i> )   | Additional school specific information arising from the EIA Send Sufficiency Plan Education Elements (10 August 2018) |
| <b>Date this EIA screening was completed</b>   |   |

| Description  |
|--|
| <b>What exactly is proposed?</b> ( <i>Briefly describe the service/policy and the changes that are being planned</i> )   |
| <p>In April 2019, SCC Cabinet approved a capital programme to support the growth and restructure of SEND provision across the county (Cabinet reports attached as Appendix 1). An EIA was included as part of the Cabinet paper presented in January 2019. This EIA provides more information about 1) school- based special units and 2) each of the special school elements of the programme.</p> <p><b>School-based special units</b></p> <p>School based units will be developed in all parts of the county with the initial phase focusing on three main areas: south, west and north Suffolk (e.g. in the <b>Ipswich, Bury St Edmunds and Lowestoft travel to learn areas</b>).</p> <ul style="list-style-type: none"> <li>• <b>Reception/Key Stage (KS) 1 units:</b> these will be mostly generic although some will also have a speech and language specialism.</li> </ul> |

- **KS2 Units for children with Cognition and Learning needs.** Children who will attend this type of provision would have needs which historically have been described as moderate learning disabilities.
- **KS2 Units for children with Communication and Interaction needs.** Children who will attend this type of provision will need specialist support to develop their skills and confidence in communicating and interacting effectively. Children may have this need because of mental health challenges, autism or other special needs which require a nurturing environment.
- **KS3/4 Units for children with Cognition and Learning Needs.** As KS2 units.
- **KS3/4 Units for children with Communication and Interaction Needs.** As KS2 units.

The indicative delivery programme follows:

| Provision Description        | Number of settings | Open in | New Places per setting | Total number of places |
|------------------------------|--------------------|---------|------------------------|------------------------|
| KS 1 generic units           | 3                  | Sep-20  | 12                     | 36                     |
| All 3 areas                  |                    |         |                        |                        |
| KS 2 Unit Cognition/Learning | 2                  | Sep-20  | 18                     | 36                     |
| KS 2 Unit Comms/Interaction  | 2                  | Sep-20  | 18                     | 36                     |
| KS3/4 Unit Cognition/Learn   | 2/3                | Sep-20  | 18                     | 36                     |
| KS3/4 Unit Comms/Interact    | 2/3                | Sep-20  | 18                     | 36                     |

| Provision Description        | Number of settings | Open in | New Places per setting | Total number of places |
|------------------------------|--------------------|---------|------------------------|------------------------|
| KS 1 Units Generic Spec      | 3                  | Sep-21  | 12                     | 36                     |
| KS 2 Unit Cognition/Learning | 2                  | Sep-21  | 18                     | 36                     |
| KS 2 Unit Comms/Interaction  | 2                  | Sep-21  | 18                     | 36                     |
| KS3/4 Unit Cognition/Learn   | 3                  | Sep-21  | 18                     | 54                     |
| KS3/4 Unit Comms/Interact    | 3                  | Sep-21  | 18                     | 54                     |

**New special schools****Communication and Interaction School, Ipswich**

This school will provide up to 80 places for children with communication and interaction (C&I) needs. Ipswich has the highest demand for this area of need and, currently, there is no provision in the area. The school has been approved to move forward as part of the government's second free special school wave and is expected to be open by September 2022. Feasibility studies on the school site in Woodbridge Road, Ipswich, are expected in September 2019. The outcome of the competition for the provider of the school is expected in Spring 2020. The Regional Schools Commissioner on behalf of the Secretary of State for Education will appoint the provider.

**Communication and Interaction School, Bungay**

This school will provide up to 80 places for children with C&I Needs. The site in Bungay is in part use by The Attic Pupil Referral Unit for which a new site is being sought in Lowestoft. We are currently considering a phased development of the new C&I school and, potentially, to co-locate the two types of provision in the short term i.e. until The Attic can be moved. A competition for a provider will open in Autumn 2019. The County Council will recommend its preferred provider to the Regional Schools Commissioner on behalf of the Secretary of State for Education.

As there is already a C&I school in West Suffolk, these two additional schools will provide a C&I school in each of the 3 areas of Suffolk.

**SEMH school, Bury St Edmunds**

The school will provide 60-80 places for children with social, emotional and mental health problems. Outside Ipswich, the greatest demand for SEMH places is in West Suffolk. A site has been identified and feasibility studies have been completed which confirm its suitability. A competition for a provider will open in Autumn 2019. The County Council will recommend its preferred provider to the Regional Schools Commissioner on behalf of the Secretary of State for Education.

**Relocation of The Attic Pupil Referral Unit**

The Attic was temporarily relocated to Bungay following a decision that its accommodation in Lowestoft was no longer fit for purpose. Whilst the temporary accommodation is of a high standard, the Bungay location is not suitable in the longer term because PRU pupils come mostly from Lowestoft. Relocation of the PRU will enable it to be closer to pupils' homes and provide an opportunity for the C&I School to be established in the entire Bungay building.

**Hampden House PRU**

Hampden House's educational and residential accommodation is no longer fit for purpose. Rebuilding both will provide accommodation designed to respond to the changing profile of need i.e. to suit an extended age range (from 8-14 to 7-16), the admission of girls and a change of profile from SEMH only to Autistic Spectrum Disorder with SEMH which will better meet the needs of this group of pupils. Consultation on changes to the unit is taking place from 2 to 27 September 2019 with a decision by SCC in mid-October.

**Why?** *(Describe the reasons for making these changes)*

Suffolk County Council has a statutory obligation to provide a suitable education placement for every child of school age and for young people with Special Educational Needs & Disability (SEND) up to the age of 25 years, where education continues to be appropriate to their needs. The Suffolk SEND Sufficiency Review published in 2018 indicated a projected rise of 18% in the number of children and young people with SEND between 2018 and 2020, and a consequent rise in the demand for specialist placements. Health data indicates the likelihood of continuing rises in demand beyond this period.

In September 2018, Cabinet received the SEND Sufficiency Review and agreed a set of principles for the future development of specialist education placements in Suffolk. The urgent need to develop more specialist provision in Suffolk was highlighted. As a result, it was agreed that a Policy Development Panel (PDP) was established to make recommendations on how specialist education should be developed in line with these principles and the escalating demand for new places.

The Panel's recommendations were approved and a capital programme developed which would deliver 24 school-based units between 2020 and 2021 along with new special schools. Funding was approved in principle to support further expansion of SEND provision beyond 2021.

This new provision would not only meet demand but would mean that high cost out of county placements would not be used as frequently and more children would be educated in Suffolk, closer to their homes, families and communities. This should make it easier for them to establish supportive relationships that will sustain them as they make their transition into Post 16 education, employment or training. In addition, many of these learners have had to travel long distances, sometimes on a daily basis, to access their education. New, more local provision will mean that more children will have shorter journeys and be more ready to learn once they arrive at school. New SEND places located in Suffolk will meet would bring added advantages of being able to more easily quality assure provision and value for money and ensure that it meets the needs of children in Suffolk.

**What will the effect of the changes be?** *(Describe which people, communities, localities etc. will be affected)*

**Impact on children with SEND**

The majority of children who currently attend out of county SEND provision will be offered opportunities in the new Suffolk based settings/schools.

Children will be assessed according to a continuum of need and placed appropriately. Many will not need to attend a special school but will be able to remain in a mainstream school with special support. Those who do need a special school will be able to attend one closer to home.

**Impact on families of children with SEND**

Families will be able to support their children more effectively and engage in their education if provision is available closer to home.

**Impact on the education community**

Schools will be able to refer children with SEND to appropriate specialist provision. More children with SEND will be included in mainstream education which could lead to a change in understanding of difference.

**How will it be implemented?** *(Describe the decision making process, timescales, process for implementation)*

The overall SEND Transformation Programme is overseen by the SEND Programme Board. The development of provision is managed by the SEND Capital Programme Board and overseen by CYP DMT.

The Schools Infrastructure and Inclusive Services Teams have operational responsibility for delivering the programme.

Development of First Phase SEND school-based units:

- September/October 2019 provider assessment and approval process
- October/December 2019 site feasibilities, design and approval of individual schemes
- February/March 2020 – works on site begin
- April to August 2020 – admissions process, provider preparation
- September 2020 – units open

**When is it due to start?** *(Planned start of new/revised policy/service)*

September 2020: first 11 school-based units open

September 2021: an additional 13 school-based units open

The following dates are still subject to confirmation:

January 2021/September 2021: new C&I School in Bungay for up to 80 pupils opens

September 2022: new C&I school Ipswich for 60 pupils opens

September 2022: new SEMH School in Bury St Edmunds for 60-80 pupils opens

September 2022: first phase of new classroom accommodation at Hampden House completed

September 2023: new residential accommodation block at Hampden House completed

**Any other relevant details** *(Additional information that will help to explain your plans; may be left blank)***Data about the user population**

**What demographic data and information about the wider community have you used in your planning?**  
*(A brief overview of quantitative data used and qualitative research undertaken, including customer surveys and focus groups, plus links to reports, local or national data that you have used)*

The SEND Sufficiency Survey provides full details of the need for more SEND provision (Appendix 2)

In summary, by 2020 the number of school age children with some form of special education need or disability will rise by at least 18% compared with 2017, even though the overall population of Suffolk children will rise by only 4%.

- There is a particularly significant rise in predicted in the numbers of children and young people with a primary need of moderate learning difficulties, autistic spectrum disorder and speech, language and communication needs.
- Between 300 and 400 new specialist education places for those aged 5-16 years are likely to be needed in Suffolk by 2020.
- Overall, we expect a 23% growth in the number of young people with SEND aged 16-25 in Suffolk over the next four years. This equates to an additional 559 young people who are likely to need Post-16 provision.

**What is the profile of your service users by protected characteristics?** (Where this data is available. If it is not currently available state any plans to collect this in future)

The SEND Sufficiency Survey provides details

#### Implications for communities and workforce

Describe how your plans will **specifically** affect (or not) people from each of the protected characteristics. Include information for service users and staff (if the changes affect them too) separately in each box.

##### Disability

What is the impact on people with **any** disability and what evidence do you have? **If you do not believe there is any impact briefly describe why not.**

The **new school-based units** will improve access to specialist education provision for children and young people with SEND in a mainstream local setting alongside other children from their natural age group wherever possible.

**New specialist schools** will be available in each of the 3 main areas of Suffolk and will mean that, other than in instances of low incidence high need, children will be able to attend a special school in Suffolk rather than travel to out of county provision.

For the school-based units, there is a competitive process which will test the inclusive ethos of prospective providers. For new schools, the provider specification will confirm the LA's expectations.

**If it has** a positive or negative impact, what will this look like? (If you expect no impact put N/A)

Positive. Faster access to a specialist education placement in an appropriate setting, closer to home. The curriculum will be designed to meet individual needs with better support for young people and children with SEND. A robust monitoring programme will drive up the quality of education.

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|  | The culture of the new school-based units will promote inclusivity and an understanding of SEND.  |
| Do you expect the extent of the impact to be low, medium or high?<br><i>(If you expect no impact put N/A)</i>  | High  |
| What could be done to mitigate any <b>negative</b> impact or further promote <b>positive</b> impact?<br><i>(If you expect no impact put N/A)</i>           | Close monitoring of the impact of new specialist placements as these are commissioned. Ongoing future planning to ensure that provision and placements are responsive to the growing and changing needs of Suffolk's SEND population.   |
| <b>Age</b>   |   |
| What is the impact on people due to their age and what evidence do you have? <b>If you do not believe there is any impact briefly describe why not.</b>    | <p>The new schools and units will provide specialist education for all children and young people with SEND.</p> <p>School-based units will be provided for pupils aged 4 – 16. New schools will be provided with an age range of 7-16 (Hampden House) where a key aim is to provide early intervention to prevent permanent exclusion or 9 -16 (SEMH and C&amp;I schools). The age range for SEMH and C&amp;I schools reflects the age at which difficulties in mainstream settings emerge and where more specialist provision is required.</p> <p>The proposals for new SEND school-based units are designed to increase the levels of inclusivity in mainstream education establishments and to this extent will affect all CYP in Suffolk.</p> |
| <b>If it has</b> a positive or negative impact, what will this look like?<br><i>(If you expect no impact put N/A)</i>                                      | This will have a positive impact on children and young people with SEND who will be able to access their education locally.   |
| Do you expect the extent of the impact to be low, medium or high?<br><i>(If you expect no impact put N/A)</i>  | High  |
| What could be done to mitigate any <b>negative</b> impact or further promote <b>positive</b> impact?<br><i>(If you expect no impact put N/A)</i>           | Ongoing future planning to ensure that provision and placements are responsive to the growing and changing needs of Suffolk's SEND population.  |
| <b>Sex (gender)</b>  |   |
| What is the impact on people due to their gender and what evidence do you have? <b>If you do not believe there is any impact briefly describe why not.</b> | <p>The units and new special schools will not differentiate with regard to gender. Male and female children will be placed in new provision according to their individual needs.</p> <p>At Hampden House, if the proposals are agreed, girls will be admitted to the unit for the first time. At the present time, there are no changes being proposed for the boarding element i.e. this is currently only available for boys but will be reviewed when the new accommodation becomes available.</p>   |

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| If it has a positive or negative impact, what will this look like?<br><i>(If you expect no impact put N/A)</i>   | Positive impact for Hampden House where places will be available for girls.<br>NA for other new schools and units   |
| Do you expect the extent of the impact to be low, medium or high?<br><i>(If you expect no impact put N/A)</i>  | High impact for Hampden House<br>NA for other new schools and units   |
| What could be done to mitigate any <b>negative</b> impact or further promote <b>positive</b> impact?<br><i>(If you expect no impact put N/A)</i>                       | Review of impact of introduction of girls. Monitoring of demand across the county for residential accommodation for girls.  |
| <b>Gender reassignment</b>   |   |
| What is the impact on people who are transgender and what evidence do you have? <b>If you do not believe there is any impact briefly describe why not.</b>             | The new provision will not differentiate on grounds of gender reassignment. Children will be placed in new provision according to their individual needs.   |
| If it has a positive or negative impact, what will this look like?<br><i>(If you expect no impact put N/A)</i>   | NA  |
| Do you expect the extent of the impact to be low, medium or high?<br><i>(If you expect no impact put N/A)</i>  | NA  |
| What could be done to mitigate any <b>negative</b> impact or further promote <b>positive</b> impact?<br><i>(If you expect no impact put N/A)</i>                       | NA  |
| <b>Sexual orientation</b>  |   |
| What is the impact on people due to their sexual orientation and what evidence do you have? <b>If you do not believe there is any impact briefly describe why not.</b> | The new provision will not differentiate on grounds of sexual orientation other than to provide support appropriate to need.  |
| If it has a positive or negative impact, what will this look like?<br><i>(If you expect no impact put N/A)</i>   | NA  |
| Do you expect the extent of the impact to be low, medium or high?<br><i>(If you expect no impact put N/A)</i>  | NA  |
| What could be done to mitigate any <b>negative</b> impact or further promote <b>positive</b> impact?<br><i>(If you expect no impact put N/A)</i>                       |   |
| <b>Race</b>  |   |
| What is the impact on people due to their race and what evidence do you have? <b>If you do not believe there is any impact briefly describe why not.</b>               | Admission to the new units and special schools will not be undertaken on the grounds of race. However, the underpinning ethos is to develop provision closer to home therefore specialist education settings could have the |



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|  | opportunity to develop stronger positive local networks that are more responsive to local racial diversity.  |
| <b>If it has</b> a positive or negative impact, what will this look like?<br><i>(If you expect no impact put N/A)</i>  | Positive. Children will continue to benefit from close family ties and local community networks as they are educated within their local community.   |
| Do you expect the extent of the impact to be low, medium or high?<br><i>(If you expect no impact put N/A)</i>  | Medium   |
| What could be done to mitigate any <b>negative</b> impact or further promote <b>positive</b> impact?<br><i>(If you expect no impact put N/A)</i>                                 | Monitoring of impact through close contact with families.  |
| <b>Religion or belief</b>  |  |
| What is the impact on people due to their religion or belief and what evidence do you have? <b>If you do not believe there is any impact briefly describe why not.</b>           | Admission to school based units or special schools will not be undertaken on grounds of religion or belief.  |
| <b>If it has</b> a positive or negative impact, what will this look like?<br><i>(If you expect no impact put N/A)</i>  | NA   |
| Do you expect the extent of the impact to be low, medium or high?<br><i>(If you expect no impact put N/A)</i>  | NA   |
| What could be done to mitigate any <b>negative</b> impact or further promote <b>positive</b> impact?<br><i>(If you expect no impact put N/A)</i>                                 | NA   |
| <b>Marriage/civil partnership</b>  |  |
| What is the impact on people who are married or in a civil partnership and what evidence do you have? <b>If you do not believe there is any impact briefly describe why not.</b> | Educating children and young people in their local community could have the potential of exerting less pressure on the family unit. Currently, the time it takes to secure appropriate provision can result in a child with SEND being at home for extended periods of time. Faster and more appropriate placements could reduce pressures on marriages, civil partnerships and, by extension, families. |
| <b>If it has</b> a positive or negative impact, what will this look like?<br><i>(If you expect no impact put N/A)</i>  | Positive. Potentially there could be less stress on the family unit if there is fast placement in appropriate local provision.   |
| Do you expect the extent of the impact to be low, medium or high?<br><i>(If you expect no impact put N/A)</i>  | Medium   |
| What could be done to mitigate any <b>negative</b> impact or further promote <b>positive</b> impact?<br><i>(If you expect no impact put N/A)</i>                                 | Monitor placement data to evaluate whether impact is achieved and if not review approach to try to secure greater benefit.   |

| Pregnancy/maternity   |   |
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| What is the impact on people who are pregnant women or those with a young child and what evidence do you have? <b>If you do not believe there is any impact briefly describe why not.</b> | Potentially, there might be less stress on the family unit due to speed, appropriateness of placement in local provision. If there is pregnancy in the family unit, this might provide an additional benefit. |
| <b>If it has</b> a positive or negative impact, what will this look like?<br><i>(If you expect no impact put N/A)</i>   | There may be less time waiting for placement which might be beneficial.   |
| Do you expect the extent of the impact to be low, medium or high?<br><i>(If you expect no impact put N/A)</i>   | Low - medium  |
| What could be done to mitigate any <b>negative</b> impact or further promote <b>positive</b> impact?<br><i>(If you expect no impact put N/A)</i>  | Monitor placement data to evaluate whether impact is achieved and if not review approach to try to secure greater benefits.   |

| Rurality  |  |
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| <i>The Rural-Urban definition (DEFRA) introduced in 2004, defines urban areas as settlements of over 10,000 people. Other settlements are defined as one of three rural types: town and fringe, village or hamlet, and dispersed.</i> |  |
| What is the impact on people who live in an urban or rural area and what evidence do you have? <b>If you do not believe there is any impact briefly describe why not.</b>   | There should be less travel time for children with SEND living in rural areas as there will be more provision available which is closer to home. Increasing the number of special school places should minimise the number of children travelling out of county to access their education. |
| <b>If it has</b> a positive or negative impact, what will this look like?<br><i>(If you expect no impact put N/A)</i>   | Positive. Children will spend less time travelling to school and should be more ready to learn when they arrive. Families will be able to develop a relationship and to work in a closer relationship with their child's school as it will be closer to home.                              |
| Do you expect the extent of the impact to be low, medium or high?<br><i>(If you expect no impact put N/A)</i>   | High   |
| What could be done to mitigate any <b>negative</b> impact or further promote <b>positive</b> impact?<br><i>(If you expect no impact put N/A)</i>  | Monitor placements to evaluate whether impact is achieved and if not review approach to try to secure greater benefits.  |

| Recommendation to EIA Review Group  |   |
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| In your opinion, should a full EIA be carried out for this policy or service change? <i>(Enter Yes or No)</i> | No  |
| Briefly give your reason  | The proposed change in policy and approach is about increasing access and equality and fundamentally about increasing opportunities for young people with SEND across |

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|  | the county of Suffolk. This change does not risk a worsening of the service offer / treatment for any group with protected characteristics. |
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A full EIA involves consultation with all stakeholders, which may include: actual and potential service users, community groups, staff and managers, partner agencies and trade unions.  
For guidance contact the Lead for Equalities and Inclusion via [EIA.mailbox@suffolk.gov.uk](mailto:EIA.mailbox@suffolk.gov.uk).