



Equality Impact Assessment (EIA)

1. Topic of assessment

EIA title	Special Educational Needs and Disabilities Strategy
EIA author	Peter Schnabel, SEND Implementation Officer

2. Approval

	Name	Date approved
Approved by	Liz Mills (Director - Education, Life-Long Learning and Culture)	18 January 2019
Approved by	Dave Hill (Executive Director, Children, Families, Learning and Culture)	18 January 2019
Approved by	Julie Iles (Cabinet Member for All-Age Learning)	18 January 2019

3. Quality control

Version number	V2.1	EIA completed	18 January 2019
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4. EIA team

Name	Job title	Organisation	Team role
Zarah Lowe	SEND Transformation Programme Manager	SCC	EIA Responsible Officer
Peter Schnabel	SEND Implementation Officer	SCC	Author/EIA co-ordinator
Deborah Chantler/ Janet Polley	Senior Principal Solicitors	SCC	Legal advisor
Kirsty Cole	Principal Commissioning	SCC	Data advisor

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	Manager (Analytics)		
Susie Campbell	Quality Assurance and Professional Standards Develop Manager (Social and Emotional Mental Health)	SCC	Service user impacts

5. Explaining the matter being assessed

What policy, function or service is being introduced or reviewed?

The purpose of this Equality Impact Assessment is to review the potential impact of the proposed special educational needs and disabilities (SEND) Strategy for Surrey.

The strategy focuses on inclusion and ensuring that children with SEND can get a good education at a school close to their home. The aim of the strategy is to make sure that every child growing up in Surrey has the best possible start in life so that children and young people with special educational needs and disabilities are able to live, learn and grow up locally. We also need to ensure that this provision is cost-effective, fair across the range of children and young people's differing needs and sufficient when taking into account predicted future rising levels of need.

We recognise that SEND impacts the whole family, including parents, carers and siblings, and that the whole family is key to supporting the child or young person with SEND and helping them to reach their potential. We therefore need to take a collective approach to ensure that support is in place to address not only the needs of the child or young person with SEND, but also their family.

What proposals are you assessing?

In order to improve outcomes for children and young people and achieve financial sustainability, we have developed a strategy based on supporting children and young people with SEND at an earlier stage.

The strategy is based on five key principles:

1. Children with special educational needs are identified earlier and supported in a timely and effective way, in order to improve their outcomes and wellbeing.
2. There is an increased focus on earlier intervention and prevention to offer help and meet needs at the earliest opportunity, reducing the demand on high cost, high need interventions.
3. Children and young people are helped to become resilient and independent so that they can lead independent and fulfilling lives in their own communities.
4. The voices of our children, young people and families are heard so they can shape and inform how we work together to get the best results.
5. Surrey's early years settings, schools, colleges and other providers are able to support children to live, learn and grow up locally and achieve their full potential.

The recent SEND consultation (30 October 2018 – 4 January 2019) asked Surrey residents to feedback on the proposed five principles, the areas of transformation and what they see as priorities for improvement. Feedback is being used to support further engagement

and co-design activity work -with families, health partners, education and other partners to develop this strategy into a jointly owned Surrey special educational needs and disabilities strategy and long term action plan.

This EIA considers the principles of the proposed SEND Strategy and the transformation proposals that have been developed in line with the strategic approach

The proposals are grouped into four areas of transformation and we are proposing to make investment into the programme in two ways:

- Providing additional core funding over the next two years
- Investment in transformation over two years directly through the SEND Transformation programme and two associated programmes (All Age Learning Disability and Family Resilience).

1 Early identification and support

In early years, schools and colleges, we will ensure children and young people with additional needs are identified earlier and receive the assessment and support they need when they need it. This means we will:

- Ensure easier access to information, advice and support.
- Develop a graduated pathway (known as a Graduated Response) with associated guidance and support to ensure children and young people with additional needs receive early support and assessment to prevent escalation to more complex needs.
- Provide support through Educational Psychology, speech and language therapy and other support at an early stage (pre-statutory) for those who need it, as part of the graduated response.
- Establish an early help behaviour and emotional wellbeing pathway that will support children and young people with mental health needs and/or challenging behaviour and their families both at home and at school. This will also be part of the graduated response.
- Support education settings, including nurseries and schools to implement the graduated response.
- Develop a robust outcomes framework and monitoring tools.
- We will review and promote the local offer.

2 Developing local services and managing the market

We will:

- Increase our local specialist school places by providing around 350 additional places over the next two years and making use of

available capacity by working with existing schools to extend and adapt their arrangements.

- Increase our post-16 and post-19 education focussed pathways by creating around 100 additional places and programmes of support over the next two years.
- Create more specialist post-16 employment focused pathways through increasing our adult learning and employability provision, and expanding our Supported Internship programme, targeting an additional 120 places over four years.
- Develop a long term property strategy for specialist school provision in order to meet the needs of children with SEND.
- Work with specialist education providers and recommission where needed to ensure we are able to support a wider range of children and reduce the number of children and young people with SEND who are out of school or being placed in high cost placements in the non-maintained and independent sector. This will be accompanied by a new funding model to support a graduated pathway.
- Implement an attendance monitoring system in targeted specialist settings to improve safeguarding, gain a clearer picture about attendance and ensure best value for money.
- Implement an ambitious market management strategy in order to achieve efficiencies in the non-maintained and independent sector. This will be supported by a dynamic purchasing system currently being tendered to manage the procurement of placements and achieve better value for money.

3 Partnership working

Working with partners in healthcare and education to ensure educational provision is effective, of a high quality and delivers the best educational outcomes for children and young people with SEND. We will:

- Facilitate the creation of local school clusters (taking account of/building on existing arrangements) and special school hubs to support flexible and blended offers of provision for children and young people with SEND.
- Develop a new school effectiveness approach, with inclusion at the heart, and seek to ensure that we reduce the number of exclusions and absence for children and young people with SEND, in-year placement changes and the number of children and young people with SEND in Pupil Referral Units for lengthy periods of time. The provision of additional specialist places where needed will also support this approach.
- Improve the quality, impact, timeliness and suitability of SEN Support plans and education, health and care planning through

	<p>the improvement of quality assurance arrangements. We will use the graduated response and annual reviews to help achieve this.</p> <ul style="list-style-type: none"> • Develop joint commissioning for children and young people with complex needs involving parents, carers, children and young people in the planning, monitoring and evaluation of services, for example, therapy provision and Children, Adolescent and Mental Health Services (CAMHS) through new commissioning team arrangements. • Improve transition for young people and support them in preparing for adulthood. This will be in conjunction with investment into an all-age disability service being developed within the County Council and with young people and partners. <p>4 Improving policy and practice</p> <p>Improve the quality of our practice with partners to improve the experience for children and young people with SEND and their families. We will:</p> <ul style="list-style-type: none"> • Improve practice and the level of skills and knowledge for all those working with children and young people with SEND. This will be developed through the newly established Children's Academy and by Teaching Schools and National Leaders of Education. • Commission a new outreach offer for mainstream schools through our Special Schools and Pupil Referral Units which will become hubs of excellence linked to early intervention and support. • Review and streamline our processes and policies to improve management and coordination of area information and maximise the positive impact of digital technology. • Improve the help, support and development for SENCos (Special Needs Co-ordinators within schools) through improved SENCo networks, training and development opportunities through the Children's Academy, sharing best practice and helpdesk arrangements.
<p>Who is affected by the proposals outlined above?</p>	<p>There are approximately 200,000 pupils in Surrey state-funded schools. Of these children and young people there are around 23,000 receiving special educational needs (SEN) support in an educational setting.</p> <p>In addition, Surrey maintains education, health and care plans (EHCPs) for a further 8,600 pupils (as of October 2018).</p> <p>The key groups affected by the proposals set out in this EIA are:</p> <ul style="list-style-type: none"> • Children and young people with SEND aged 0-25 in Surrey. • Parent carers (this term covers parents, grandparents, foster parents and special guardians) and siblings.

- Provider organisations across education, health and care and training including, but not limited to: early years settings; schools (maintained and independent); colleges; and providers of employment related skills and training.
- Staff from provider organisations including local authority staff and provider staff who support children and young people with SEND and their families.

6. Sources of information

Engagement carried out

- Service leads workshop (9 July 2018)
- Surrey CCG Children's Lead Commissioner and Children and Families Health Surrey
- Schools Forum
- Schools Phase Councils (Early Years, Primary, Secondary and Special)
- Schools Funding consultation (3-25 September 2018)
- Family Voice Surrey – children, young people, families
- Individual Interviews with key professionals undertaken by The 'Public Office'
- A formal public consultation on the proposed SEND strategy opened on 30 October 2018 and closed on 4 January 2019. Engagement and consultation events were conducted across All Districts and Boroughs, including evening and weekend events.

There were a total of **1133** responses to the consultation:

- **637** (56%) of respondents are a parent/carer of a child or young person with SEND
- **21** (2%) respondents are young people with SEND
- **837** (74%) of respondents are female
- Only **4%** of respondents identify as from black and minority ethnic (BME) groups. (Expectations in line with population from 2011 census would be 10%)

Data used

- Joint Strategic Needs Analysis (JSNA)
- SEND Strategy (Draft):
 - Finance data – historical spend in previous years and projected spend
 - MTFP
 - Performance Data
 - School Attainment data
 - Benchmarking against other similar Local Authorities
 - Overall Surrey Transformation Plan – other transformation programmes which support delivery of SEND services:
 - Family Resilience
 - All Age Learning Disability (AALD)
 - Information/research regarding peer local authority operating models
 - Personal Outcomes Effectiveness Tool (POET)
 - SEND Sufficiency
 - Sustainable Futures Project
- Family Voice Surrey SEND Survey (Submission to SCC re SEND Transformation Strategy Consultation – January 2019)
- Public consultation on SEND Strategy (30 October 2018 to 4 January 2019) – initial quantitative and qualitative findings – summary report January 2019:

7. Impact of the new/amended policy, service or function

The SEND Strategy has been developed in order to improve outcomes for children and young people and achieve financial sustainability.

The strategy proposes to achieve the shift in focus of support for children and young people with special educational needs and disability to an earlier pre-statutory stage and reduce our reliance on high cost placements in the non-maintained and independent sector.

This wide ranging transformation, involving all stakeholders, means that we will do things in a different way to deliver the better outcomes in a way that is financially sustainable.

In response to the feedback we have received back from the consultation we are proposing to do further engagement and co-design work with families and health and other partners to develop a strategy and a more detailed action plan that is jointly developed and owned with partners that will be consulted on and impact assessed as necessary.

Strategy / Proposal	Impact
Early Identification and Support:	<p>The impact of early identification and support will be that more children and young people with additional needs will receive early support and assessment with the aim of preventing escalation to more complex needs. This means that fewer children are likely to require specialist support and provision. In addition, working across services to provide early intervention, mental health support and a blended offer of wraparound support as need.</p> <p>We would expect early identification and support to potentially impact in the following ways:</p> <ul style="list-style-type: none"> • to increase the number of children with SEN Support Plans receiving specialist support at a pre-statutory stage. • to improve in the attainment and progress for children and young people on SEN Support and with a Statutory plan • to increase the number of children and young people who attend mainstream settings • to decrease the number of children who need to request an EHCP • to decrease the number of children and young people with SEND who are excluded from education settings.
Developing local services and	The investment in more state-funded specialist provision in Surrey or close to Surrey will drive the following impacts:

managing the market:	<ul style="list-style-type: none"> • An increase in the number of state-funded specialist school places in Surrey so that children will not need to travel so far to school and are able to maintain links with their community • An increase in the number of children and young people travelling independently or supported by their family • A decrease in the average distance travelled between home and school for pupils with EHCPs • An increase in the number of post 16/19 employment focussed pathways for young people to provide better support for their preparation for adulthood
Partnership working:	<p>Working in partnership with health, care and education settings and other services and organisations will ensure that children and young people with SEND achieve good outcomes and access provision and services that are of a high quality. Within this area of transformation, there is a focus on improving school effectiveness and sharing of best practice.</p> <p>This area of transformation will have the potential impact of:</p> <ul style="list-style-type: none"> • An improvement in the attainment and progress for children and young people on SEN Support and with a statutory plan. • a decrease in the number of children and young people with SEND who are excluded from education settings • a decrease in the number of children who need to request an EHCP
Improving policy and practice:	<p>Improving policy and practice through upskilling the wider workforce supporting children and young people with SEND and their families and streamlining processes and policies is likely to have the following impact:</p> <ul style="list-style-type: none"> • Increasing the number of children and young people with EHC plans who are able to attend and remain in mainstream settings • An improvement in the attainment and progress for children and young people on SEN Support and with a statutory plan

7a. Impact of the proposals on residents and service users with protected characteristics

Protected characteristic	Potential positive impacts	Potential negative impacts	Evidence
Age	<p>Early identification and support implemented across all ages giving early access to support and intervention.</p> <p>Improved transition for young people and support for them in preparing for adulthood.</p> <p>Increase in post – 16 and post – 19 pathways by creating around 100 additional places and programmes of support over the next two years. We will also work with post-16 providers and special schools to create additional post -16 capacity</p> <p>Create more specialist post - 16 employment focussed pathways through increasing our adult learning and employment provision and expanding our Supported Internship programme.</p>		<p>Identification of special educational needs and disabilities across the 0 to 25 age range will differ according to age and type of need.</p> <p>The proposals to provide more educational psychology and therapy support in the pre-statutory phase before a request for an EHCP has been made should benefit all age groups to reduce the level of need escalating by delivering more timely support.</p> <p>Special educational needs may begin to be identified when a child moves into an Early Years setting, such as a nursery or childminder.</p> <p>Many needs are identified once a child has moved to primary school or secondary school.</p> <p>The FVS survey highlighted the overwhelming support for the positive impact of post 16 special education and employment opportunities.</p> <p>The Special Educational Needs and Disability Code of Practice: 0-25 years specifically requires the application of a graduated approach to support children and young people with SEND prior to any statutory assessment and planning.</p>

			<p>The proposals place more emphasis on Preparing for Adulthood for those in National Curriculum Year 9 and beyond. This is the reasoning for developing more pathways for independence and employment for young people over 16.</p> <p>The number of EHCPs by age groups are shown below:</p> <p>Number of EHCPs ages 0-25 (5 October 2018):</p> <ul style="list-style-type: none"> • 8600 EHC Plans <p>Age of EHCP holders / General Population (NCY?)</p> <ul style="list-style-type: none"> • 0 to 4, 3.4% / 20.2% • 5 to 9, 27.9% / 22.2% • 10 to 14, 35.0% / 20.9% • 15 to 19, 28.8% / 18.8% 20 to 24, 4.9% / 18.0%
Disability	<p>Early Identification and Support</p> <p>Increased Educational Psychology, Speech and Language Therapy (SLT) and Occupational Therapy (OT) capacity and support as part of graduated response for children and young people in pre-statutory phase.</p> <p>Early identification and support removes lengthy statutory assessment process before the delivery of more timely and appropriate support</p>		<p>440 respondents to the public consultation (out of 1133 – 39%) provided written comments in addition to the quantitative assessment of the proposals regarding this transformational area of work.</p>

	<p>Establishing a new early help behaviour and emotional wellbeing pathway and additional support reduces exclusions from settings.</p> <p>Graduated response requires partners and educational settings to deliver more services and outcomes in pre-statutory phase.</p> <p>Provision closer to home and market management</p> <p>More local school provision will reduce travel distances and time for children and young people.</p>	<p>Market management of the NMI sector may result in some schools withdrawing from the market with negative consequences for the range of specialist provision available to meet the needs of children and young people. Some types of complex/specialist provision may no longer be available.</p> <p>Parents may perceive that less specialist provision is available for children and young people with the strategy's aim to reduce the number of children and young people placed further away from home in non-maintained and independent placements</p>	<p>396 respondents to the public consultation (out of 1133 – 33%) provided written comments in addition to the quantitative assessment of the proposals regarding this transformational area of work.</p> <p>Sufficiency plan and supporting analysis provides a detailed analysis of home to school travel distances</p> <p>With fewer NMI places and more children attending maintained special schools, the increased number of maintained special school places will be located to address local unmet needs and to reduce travel distances/times equitably. The sufficiency planning has identified areas of unmet need and travel times/distances.</p> <p>Some respondents from the public consultation wrote about how more support is needed for children and young people in mainstream settings and some respondents gave personal experiences of mainstream not meeting needs. This issue of 'mainstream not meeting needs' was a high ranking topic in the consultation question regarding the principles of the proposed strategy. Some respondents were hopeful that more children and young people with</p>
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	<p>Working with partners:</p>		<p>SEND could attend mainstream settings in the future if more support was given. However some respondents were clear that there should be enough special school places for children and young people with specific needs.</p> <p>Some respondents were also concerned about negative impacts on both SEND and other learners through more inclusion in mainstream schools.¹</p> <p>344 respondents to the public consultation (out of 1133 – 30%) provided written comments in addition to the quantitative assessment of the proposals regarding this transformational area of work.</p> <p>The FVS survey identified the inclusion based schools effectiveness approach as a crucial part of the transformation approach: “exclusions at the gate or after entry need to stop and schools need to reflect their communities”.</p> <p>The FVS survey identified the improvement of SEN Support plans as a crucial part of the transformation, leading to a “consistent and parent-centred process with clear links to escalation or step down as appropriate”.</p>	
			<p>Practice and policy:</p>	
				<p>270 respondents to the public consultation (out of 1133 – 24%) provided written comments in addition to the quantitative assessment of the proposals regarding this transformational area of work.</p> <p>The FVS survey is highly supportive of this area of work and is “critical that this takes place; SEND is invisible to many people who should be knowledgeable and supporting; very few are aware of being part of any overall integrated support network....this must be a first priority for the Children’s Academy”.</p>

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			<p>The primary contacts for parents of children with EHCPs are the SEN Caseworker and the child's school for case specific issues.</p> <p>More general information about SEND can be obtained from many sources including Voluntary, Community and Faith Sector (VCFS) organisations, the SEND Local Offer, Family Information Service (FIS) and Surrey SEND Information, Advice and Support Service (SSIASS).</p> <p>Young people can meet new friends through the Surrey Youth Advisors Service (SYAS).</p> <p>Effective communication channels need to be designed to meet the needs of different audiences - children, young people and their parents/carers.</p> <p>The drive for more digital communication must not disadvantage those groups whose do not have access to IT or are unable to use it effectively.</p>
Gender reassignment	Gender identity and sexual orientation issues may be masked by behavioural and Emotional Wellbeing and Mental Health difficulties making early intervention and support more difficult to deliver effectively.	None identified	<p>No SEND specific data is available.</p> <p>Gender identity issues may be masked by behavioural and EWMH difficulties making early intervention and support more difficult to deliver effectively.</p>
Pregnancy and maternity	None identified	None identified	
Race	None identified	None identified	<p>The response to the consultation was low from BME and therefore we need to do further work to understand the potential impacts that these proposals will have.</p> <p>The effectiveness of early intervention by Education Psychologists and Speech and Language Therapists as</p>

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			part of the proposals for graduated response may be reduced if children from ethnic groups have not had 'First Language Assessments'. Identification of SEND in children for whom English is not their first language may be difficult because of language issues.
Religion and belief	None identified	None identified	
Sex	Proposals to increase special school places according to local need may allow any increase in demand for single sex or mixed provision to be addressed.	None identified	<p>More boys than girls in Surrey are identified as having special educational needs and disabilities for both SEN Support Plans and statutory EHC Plans. In addition, we know that the incidence of differing types of need are changing at different rates, such as the increasing number of girls requiring social, emotional and mental health (SEMH) provision.</p> <p>For all types of special educational support (both statutory EHC plans and SEN Support plans) in Surrey schools (is this maintained schools? Only SEN support in mainstream), boys outnumbered girls by over two to one with 14354 boys and 6903 girls (SCC SEND Needs analysis 2016)</p> <ul style="list-style-type: none"> • General Surrey population (Male, 51.1% <p>EHCP holders:</p> <ul style="list-style-type: none"> • Female, 26.4% • Male, 73.6% <p>This means that the proportion of boys to girls increases to 3 to 1 for holders of EHC plans.</p>
Sexual orientation	Gender identity and sexual orientation issues may be masked by behavioural and Emotional Wellbeing and Mental Health difficulties making early	None identified	<p>Sexual orientation issues may be masked by behavioural and EWMH difficulties making early intervention and support more difficult to deliver effectively.</p> <p>.</p>

	intervention and support more difficult to deliver effectively.		
Marriage and civil partnerships	None identified	None identified	
Carers (protected by association)	None identified	None identified	

7b. Impact of the proposals on staff with protected characteristics

Protected characteristic	Potential positive impacts	Potential negative impacts	Evidence																								
Age	The use of digital technology supports opportunities for flexible working practices to reduce travel, to work away from the office (including at home) and outside normal working hours where operationally acceptable	1. Some staff with protected characteristics may struggle to adapt to the new technology	<p>Ages of local authority staff working in SEN (excludes children's social care) – source SCC Data Operations – Equalities & diversity Monitoring Green Sheet - January 2019):</p> <table><tr><th>Age range (years)</th><th>Percentage %</th></tr><tr><td>20-24</td><td>3.4</td></tr><tr><td>25-29</td><td>9.4</td></tr><tr><td>30-34</td><td>9.3</td></tr><tr><td>35-39</td><td>13.9</td></tr><tr><td>40-44</td><td>13.0</td></tr><tr><td>45-49</td><td>13.6</td></tr><tr><td>50-54</td><td>14.6</td></tr><tr><td>55-59</td><td>11.6</td></tr><tr><td>60-64</td><td>7.9</td></tr><tr><td>65-69</td><td>2.7</td></tr><tr><td>70-74</td><td>0.6</td></tr></table>	Age range (years)	Percentage %	20-24	3.4	25-29	9.4	30-34	9.3	35-39	13.9	40-44	13.0	45-49	13.6	50-54	14.6	55-59	11.6	60-64	7.9	65-69	2.7	70-74	0.6
Age range (years)	Percentage %																										
20-24	3.4																										
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35-39	13.9																										
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			<div>75+ 0.2</div> <p>Just over 50% of staff are aged 45 or older.</p>
Disability	The use of digital technology supports opportunities for flexible working practices to reduce travel, to work away from the office (including at home) and outside normal working hours where operationally acceptable	<p>Detailed proposals to be developed may change ways of working for different SEND related jobs with a range of potential impacts. These might include changes to the requirements for travel or changes to ways of working through increased use of digital technologies with implications for staff with physical and sensory disabilities.</p> <p>The proposals currently identify no changes</p>	<p>Disability analysis: 11.1 % of staff have declared disabilities</p> <ul style="list-style-type: none"> Types of staff disability (which may impact on ways of working: <ul style="list-style-type: none"> Mobility, transport Visual/aural - Use of IT/phones etc <p>Many SEND staff already travel to meet children, young people and their families. The strategy to increase early intervention and support is unlikely to increase the amount of travel.</p>
Gender reassignment	None identified	None identified	
Pregnancy and maternity	The use of digital technology supports opportunities for flexible working practices to reduce travel, to work away from the office (including at home) and outside normal working hours where operationally acceptable	Detailed proposals to be developed may change ways of working for different SEND related jobs with a range of potential impacts. These might include changes to the requirements for travel or changes to ways of working through increased use of digital technologies with implications for staff with physical and sensory disabilities.	<p>Data is not held on pregnancy and maternity.</p> <p>With 90% of staff being female and 50% of staff aged under 45, this means that at least 40% of staff under age 45 will be female.</p> <p>It is therefore reasonable to assume that pregnancy and maternity issues will need to be considered carefully in the co-design of detailed proposals.</p>

		The proposals currently identify no changes																
Race	None identified	None identified																
Religion and belief	None identified	None identified																
Sex	None identified	<p>Changes to working practices may affect more women than men due to the larger number of women than men in many SEND roles.</p> <p>The proposals currently identify no changes and consequential impacts.</p>	<p>Gender and full time/part time status (SEN staff):</p> <table><tr><td>Gender</td><td>Full/part time</td><td>Percentage %</td></tr><tr><td>Female</td><td>Full Time</td><td>27.9</td></tr><tr><td>Female</td><td>Part Time</td><td>60.7</td></tr><tr><td>Male</td><td>Full Time</td><td>5.5</td></tr><tr><td>Male</td><td>Part Time</td><td>5.9</td></tr></table> <p>A total of 88.6% of staff are female.</p>	Gender	Full/part time	Percentage %	Female	Full Time	27.9	Female	Part Time	60.7	Male	Full Time	5.5	Male	Part Time	5.9
Gender	Full/part time	Percentage %																
Female	Full Time	27.9																
Female	Part Time	60.7																
Male	Full Time	5.5																
Male	Part Time	5.9																
Sexual orientation	None identified	None identified																
Marriage and civil partnerships	None identified	None identified																
Carers (protected by association)	The use of digital technology supports opportunities for flexible working practices to reduce travel, to work away from the office (including at home) and outside normal working hours where operationally acceptable	None identified	<p>Data is not held on whether a role holder within the organisation has carer responsibilities.</p> <p>However, it would not be unreasonable to assume that there are a significant number of staff with carer responsibilities because the following data is closely aligned with generally accepted carer demographics:</p> <ul style="list-style-type: none">• high proportion of female staff• 50%+ of staff aged over 45• high proportion of part-time staff															

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			<p>Changes in the way services are delivered, for example, working patterns/hours, locations may impact on the ability of staff who are carers to continue delivering care. This may have an indirect impact on some with protected characteristics (age, sex)</p> <p>The current proposals do not identify any specific changes and hence there are currently no identified negative impacts on this protected category.</p>
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8. Amendments to the proposals

Change	Reason for change
<p>Although the majority of responders agreed with the proposed five principles and areas of transformation, a number of responders stressed the importance of partnership working with Health, Care and Education settings in order to achieve real change. We are proposing that further engagement and co-design work needs to take place with families and partners to develop this into a joint strategy, that is owned across the whole SEND system, rather than just the Council</p> <p>Some responders felt that there was a lack of detail contained within the strategy about how SEND transformation was going to be achieved. We are proposing to address through the joint development of a detailed action plan with partners.</p>	N/A

Emerging themes from public consultation analysis

The results of the consultation support the direction of travel of the principles and in particular the four identified areas of transformation (See section 7) and the consultation analysis report. Analysis of the qualitative feedback from respondents has identified many themes, largely drawn from experiences of the current SEND system rather than the proposals, to be considered in the next phase of co-design.

9. Action plan

Potential impact (positive or negative)	Action needed to maximise positive impact or mitigate negative impact	By when	Owner
Negative – Market management of the NMI sector may result in some schools withdrawing from the market with negative consequences for the range of specialist provision available to meet the needs of children and young people. Some types of complex/specialist provision may no longer be available.	Engagement and consultation with the Non-Maintained and Independent sector to help shape their offer and support development of a sustainable market	On-going	Director of Commissioning
Negative – Parents may perceive that less specialist provision is available for children and young people with the strategy's aim to reduce the number of children and young people placed further away from home in non-maintained and independent placements	Develop appropriate communications and engagement within the overall communications and engagement strategy to show how proposals deliver more, appropriate placements	On-going	Service Manager – SEND Programme
Negative – Some staff with protected characteristics may struggle to adapt to the new technology	Training will be designed and delivered to ensure all staff have the right IT skills	April 2020 onwards	Director of Education, Lifelong Learning and Culture
Negative - Detailed proposals to be developed may change ways of working for different SEND related jobs with a range of potential impacts. These might include changes to the requirements for travel or changes to ways of working through increased use of digital technologies with implications for staff with physical and sensory disabilities. The proposals currently identify no changes	Training will be designed and delivered to ensure all staff have the right IT skills	April 2020	Director of Education, Lifelong Learning and Culture
Negative - . Changes to working practices may affect more women than men due to the larger number of women than men in many SEND roles.	This will be reviewed on an on-going basis. The directorate restructure also includes its own EIA	April 2018 onwards	Director of Education, Lifelong Learning and Culture

The proposals currently identify no changes and consequential impacts.			
Positive – Early identification and support implemented across all ages giving early access to support and intervention.	The further co-design work of the graduated response and a jointly owned strategy and implementation plan, working with our health partners and settings will help to develop a greater understanding of the challenges within this sector and how these can be addressed.	September 2019	Director of Education, Lifelong Learning and Culture
Positive - Improved transition for young people and support for them in preparing for adulthood.	Ensure sufficient number of places on each pathway to meet demand	September 2019	Assistant Director for All Age Learning Disabilities
Positive - Increase post – 16 and post – 19 pathways by creating around 100 additional places and programmes of support over the next two years. We will also work with post-16 providers and special schools to create additional post - 16 capacity	Ensure sufficient number of places on each pathway to meet demand	September 2019	Assistant Director for All Age Learning Disabilities
Positive - Create more specialist post - 16 employment focussed pathways through increasing our adult learning and employment provision and expanding our Supported Internship programme.	Ensure sufficient number of places on each pathway to meet demand	September 2019	Assistant Director for All Age Learning Disabilities
Positive - Graduated response requires partners and educational settings to deliver more services and outcomes in pre-statutory phase.	The further co-design work of the graduated response and a jointly owned strategy and implementation plan, working with our health partners and settings will help to develop a greater understanding of the challenges within this sector and how these can be addressed.	September 2019	Director of Education, Lifelong Learning and Culture
Positive - Early identification and support removes lengthy statutory assessment process before the delivery of more timely and appropriate support	Establishing a new Graduated Response implementation team will also help ensure this work has the required impact.	April 2019	Assistant Director for Vulnerable Learners
Positive - New early help behaviour and emotional wellbeing pathway and additional support reduces children from being excluded from settings.	Joint working with health partners and settings and co-design with families will be a key part of the development of this pathway	April 2019	Assistant Director for Vulnerable Learners

Positive - Increased Educational Psychology, Speech and Language Therapy (SLT) and Occupational Therapy (OT) capacity and support children and young people in pre-statutory phase.	The impact of this will be monitored through the SEND Programme Board	April 2019	Assistant Director for Vulnerable Learners
Positive – More local school provision will reduce travel distances and time for children and young people.	The impact of this on travel will be monitored through the SEND Programme Board	April 2020	Service Manager – SEND Programme
Positive – Gender identity and sexual orientation issues may be masked by behavioural and Emotional Wellbeing and Mental Health difficulties making early intervention and support more difficult to deliver effectively.	The development of Emotional Wellbeing and Mental Health behavioural pathways needs to take this into account.	September 2019	Assistant Director for Vulnerable Learners
Positive – The use of digital technology supports opportunities for flexible working practices to reduce travel, to work away from the office (including at home) and outside normal working hours where operationally acceptable	The Digital transformation programme will support this.	Ongoing	Programme Manager for Digital Transformation

10. Potential negative impacts that cannot be mitigated

Potential negative impact	Protected characteristic(s) that could be affected
None identified at this stage	N/A

11. Summary of key impacts and actions

Information and engagement underpinning equalities analysis	<ul style="list-style-type: none"> • SEND Sufficiency planning (2017/2018) • Engagement with schools – Schools Forum and Phase councils • Engagement with service leads • Residents engagement events (October 2018) • SEND Transformation Business Case (September 2018) • SEND Strategy (October 2018) • Family Voice Surrey SEND Survey (Submission to SCC re SEND Transformation Strategy Consultation – January 2019) • SEND Strategy Public Consultation (October 2018 – January 2019)
Key impacts (positive and/or negative) on people with protected characteristics	<p>Key positive impacts on service users:</p> <ul style="list-style-type: none"> • Strengthened early identification services • Provision delivered closer to home <p>Key negative impacts:</p> <ul style="list-style-type: none"> • None identified at this stage
Changes you have made to the proposal as a result of the EIA	None at this stage. The analysis of the public consultation and other engagement methods over the October to January 2019 period will inform the more detailed co-design phase.
Key mitigating actions planned to address any outstanding negative impacts	<p>Key mitigating actions to address outstanding negative impacts include:</p> <ul style="list-style-type: none"> • Co-design of detailed proposals to deliver projects defined in the four areas of work within the strategy.
Potential negative impacts that cannot be mitigated	None identified at this stage.