

CABINET

20 DECEMBER 2011

OUTCOMES OF CONSULTATION FOR THE PRESCRIBED ALTERATIONS AT BRADFIELDS COMMUNITY SPECIAL SCHOOL

Portfolio Holder: Councillor Les Wicks, Children's Services

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Summary

This report outlines the outcomes of the consultation period on the council's proposals to expand the age range, increase the categories of special educational needs and to increase the numbers able to attend Bradfields Community Special School, by way of statutory prescribed alterations.

1. Budget and policy framework

- 1.1 The proposals to make prescribed alterations to Bradfields Community Special School are consistent with the provisions of the School Organisation Plan and the Special Educational Needs Policy and Strategy, which both flow from the Children and Young People's Plan (policy framework) and is within budget, therefore this is a matter for Cabinet.

2. Background

- 2.1 On 2 August 2011 Cabinet considered a report outlining the proposals to make prescribed alterations to Bradfields, and the reasons why these were being recommended. Under decision 93/2011 Cabinet authorised officers to proceed with an initial informal consultation period to allow views to be expressed on the proposals to make prescribed alterations to Bradfields Community Special School.
- 2.2 The consultation took place over a seven-week period between 19 September and 6 November 2011, and the results of this are set out in sections 4,5, 6 and 7 of this report.
- 2.3 Bradfields is a community special school, which currently provides education for pupils with Moderate Learning Difficulties (MLD) and Autistic Spectrum Disorder (ASD) between the ages of 11 and 19 whose needs are too complex to be supported within a mainstream setting. From September 2011, the sixth

form of Bradfields relocated from its previous base on the Brompton Academy site, into the former Ridge Meadow buildings adjacent to the main Bradfields site.

- 2.4 Members declared in Full Council (February 2011) their commitment to developing an all age range autism provision within the vacant buildings on the former Ridge Meadow site.
- 2.5 There is also a report elsewhere on this agenda seeking approval to commence the procurement process to add to the physical provision based on the Bradfields campus, where the former Ridge Meadow site is being developed as the Bradfields Lower School. Progress on the procurement process is subject to the final approval of the prescribed alterations as set out in paragraph 3.1 below.

3. The Proposals

- 3.1 The proposals are, by way of statutory prescribed alterations;
 - a) To alter the upper and lower age ranges at the school, which will enable the school to admit pupils from the age of 3 and continue to provide education beyond the current age of 19, until the age of 25 as appropriate in order to deliver the Council's commitment to ASD development.
 - b) To increase the categories provided for to include SLD (Severe Learning Difficulties). This proposal will ensure increased and appropriate provision is available in Medway for those ASD pupils who will have been identified as having SLD as well, reflecting the changing profile of the school population.
 - c) To increase the number of pupils for whom the school can make provision. There will be an increase in the numbers that attend the school by up to 40 pupils, enabling those ASD pupils with extreme challenging behaviour to be placed at Bradfields where it is the most appropriate provision, thereby reducing the number of pupils requiring placement outside of Medway.
- 3.2 The proposals are in line with the Medway vision as stated in 'Special Educational Needs – an inclusive policy and strategy for Medway 2009-2014', which is consistent with the every child matters framework and flows from the Medway Children and Young People's Plan. The policy states the fundamental principles for SEN in Medway to be;
 - a child with special educational needs should have their needs met;
 - the special educational needs of most children will normally be met in a mainstream school;
 - children's needs will be met in an appropriate way;
 - the views of the child should be asked and taken into account;
 - parents/carers have a vital role to play in supporting their child's education;
 - children with special educational needs deserve full access to a broad, balanced and relevant curriculum with clear post 16 progression routes and options.
- 3.3 The proposals to make prescribed alterations at Bradfields are in line with SEN strategic planning. Proposals that flow directly from the plan will need to be phased to take account of demand and funding streams. These proposals form

an intrinsic part of the phasing, and are being put forward at this time as there is an increase in the need for places for children and young people with ASD who also present severe learning difficulties.

- 3.4 It is proposed, subject to the outcome of the consultation period and subsequent period of statutory representation, to implement the changes on or before 1 September 2012.

4. Results of the Consultation

- 4.1 Prior to the start of the consultation, there had been informal discussions with the Head Teacher of Bradfields on this matter, and he and the Governing Body are supportive of the proposals.
- 4.2 There is a requirement to conduct an informal consultation where the views of all interested parties may be expressed, and all views taken into consideration before moving to statutory representation.
- 4.3 The period of informal public consultation where proposals were published and made available to interested parties, ran for seven weeks from 19 September 2011 to 6 November 2011. The process included;
- public consultation documents circulated to the stakeholders and organisations listed in Appendix 1;
 - publication of consultation document on Medway Council's website, and on the schools forum;
 - press notice placed in local newspaper to notify the public of the consultation period.
- 4.4 There were 174 written responses in total, to the three individual consultations in the form of reply slips and letters, which were broken down as follows;

5 Proposal to increase the age range to 3-25

- 5.1 The public consultation document (attached as Appendix 3) asked for a ticked response to one or other of the following statements:

“ I approve of the proposal to increase the lower and upper age limits from 11-19 to 3-25 at Bradfields School” or

“ I object to the proposal to increase the lower and upper age limits from 11-19 to 3-25 at Bradfields School”

- 5.2 During the consultation period 56 responses were received to this proposal, of which 48 were supportive and eight objected. The following paragraphs indicate a breakdown of who supported and who objected.
- 5.3 Of the 48 responses in support of the proposal, 18 were from parents and 20 were from staff at the school, and there was a single joint response in favour from the governing body of Bradfields. The remaining nine were made up of; three headteachers from other local schools, the MP for the area, SENCO's from two schools, a local pre-school, one parent from another special school, and individual response from a governor.

The objections came from four parents (it is unclear whether these are parents of Bradfields students, or from other special schools), and four other sources, which included; the headteacher of another special school, the governing body of the same special school, an individual governor of another school and one person who chose to remain anonymous.

- 5.4 The response form also provided space for further comment. The comments received from the reply slips were sifted and placed into a series of categories matching the comments and concerns of the respondents. These are shown in the table below. Some respondents offered more than one comment, and some reasons were included in more than one response, which has resulted in the total number of reasons in the table below exceeding the number of response sheets received.

Approvals (48 were received in total which included the following comments)

| | |
|----|--|
| 27 | No reason given |
| 8 | Reduces transitions for vulnerable children, for whom change can be distracting and unsettling. |
| 7 | Will benefit older pupils, whose options are limited post 19, which will give the opportunity for better life chances, and progression into the wider community. |
| 6 | Will benefit pre school children with an appropriate provision. |

Objections (8 were received in total which included the following comments)

| | |
|---|--|
| 3 | The age range is too wide; will this dilute provision? Will the unit be viable with potentially small numbers in certain age categories? |
| 2 | No reason given |
| 2 | Not clear why the proposals are being consulted upon at this time, given that no decisions from the SEN Masterplan have yet been made. |
| 2 | Having the wider age range at Bradfields discriminates against other special schools, whose pupils do not have the opportunity to continue their education beyond the age of 19. |
| 1 | The money should be split between all special schools to give all schools the opportunity to expand their age ranges. |
| 1 | The proposal will impact upon all special schools by creating competition between them as there will be crossover of provision at more than one school |
| 1 | The proposals are driven by expediency and money saving, rather than the needs of the learners. |

6 Proposal to extend the categories provided for to include SLD (Severe Learning Difficulties).

- 6.1 The public consultation document (attached as Appendix 3) asked for a ticked response to one or other of the following statements:

“ I approve of the proposal to extend the range of Special Educational Needs categories at Bradfields School” or

“ I object to the proposal to extend the range of Special Educational Needs categories at Bradfields School”

6.2 61 responses were received to this consultation, of which 51 were supportive of the proposal and 10 objected. The following paragraphs indicate a breakdown of who supported and who objected.

6.3 Of the 51 responses supporting the proposal, 23 were from staff at the school, 17 from parents, one joint response from the members of Bradfields Governing Body, and ten from various other sources which included the local MP, local playgroups and pre-schools, heads and governors from other Medway schools, a SENCO from another school and a parent from another Medway Special School.

The objections came from six parents; it is not clear if these are parents of Bradfields pupils or from other schools, and four other responses came from the head teacher and the governing body at another Medway Special School, one from a governor at another unspecified Medway school, and there was one anonymous response.

6.4 The response form also provided space for further comment. The comments received from the reply slips were sifted and placed into a series of categories matching the comments and concerns of the respondents. These are shown in the table below. Some respondents offered more than one comment, and some reasons were included in more than one response, which has resulted in there being a higher number of reasons shown in the tables below, than actual response sheets received.

Approvals (51 were received in total which included the following comments)

| | |
|----|--|
| 32 | No reason given |
| 5 | A benefit to the pupils who will receive appropriate provision |
| 4 | A good idea |
| 4 | It will improve the quality of life for the children as well as their parents |
| 4 | Will provide better provision across Medway for ASD/SLD pupils |
| 1 | Yes, but only autistic SLD students and not SLD in general |
| 1 | Yes, but could money be better spent supporting other early years settings across Medway |

Objections (10 were received in total which included the following comments)

| | |
|---|--|
| 4 | Not ideal to mix SLD with MLD (Bradfields current category), it will be detrimental to the education of the MLD children |
| 3 | No reason given |
| 2 | Why are the proposals being considered before the SEN Masterplan has been decided upon |
| 2 | Detrimental impact on other special schools, as it will introduce competition between them |
| 2 | The proposal seems to be driven by expediency and not on the needs of the learners |

| | |
|---|---|
| 1 | Funding should go to Abbey Court |
| 1 | The joint proposals give an advantage to Bradfields students, and therefore discriminate against those at other schools |

7 Proposal to increase the number of pupils by a maximum of 40

7.1 The public consultation document (attached as Appendix 3) asked for a ticked response to one or other of the following statements:

“ I approve of the proposal to increase the number of pupils provided for at an expanded Bradfields School” or

“ I object to the proposal to increase the number of pupils provided for at an expanded Bradfields School”

7.2 57 responses were received to this proposal, with 49 being supportive and eight objecting. The paragraphs below indicate a breakdown of who supported and who objected.

7.3 Of the 49 responses that supported the proposal, 19 came from parents, 17 from staff, one from the Governing Body of Bradfields, with the remaining twelve from a variety of sources including, a number of pre-school and nursery leaders, headteachers and governors from other schools, local SENCO's, the local MP, and a parent from another special school.

Of the eight objections, four came from parents, and four from other sources including the head teacher and the governing body at another Medway Special School, one from a governor at another unspecified Medway school, and one anonymous response.

7.4 The response form also provided space for further comment. The comments received from the reply slips were sifted and placed into a series of categories matching the comments and concerns of the respondents. These are shown in the tables below. Some respondents offered more than one comment, and some reasons were included in more than one response

Approvals (49 were received in total which included the following comments)

| | |
|----|--|
| 32 | No reason given |
| 8 | More children will be provided for |
| 4 | Yes, providing the appropriate number of skilled staff are employed |
| 1 | Yes, but only once the extended buildings are ready |
| 1 | Yes, providing that the selection process is fair |
| 1 | It will enrich Bradfields enviroment |
| 1 | A good idea to expand the provision |
| 1 | By increasing the number of places for pupils with ASD/SLD needs, it will free spaces at other schools for more appropriate placements |

Objections (8 were received in total which included the following comments)

| | |
|---|---|
| 2 | There is a danger of the school becoming too large, where individual needs cannot be met, and standards will fall, and will restrict pupils being able to mix other children. |
| 2 | Object if the selection process is not based upon primary need. By extending the provision at only one school, it will blur the context for all schools |
| 1 | Saving money seems more important than pupils needs |
| 1 | Should expand Abbey Court, not Bradfields |
| 1 | No reason |
| 1 | Proposal has been considered outside of the SEN Masterplan |

8 Advice and analysis

- 8.1 The age range at the school following implementation of the proposals would be 3-25. It is expected that there will be an increase by up to a maximum of 40 pupils with severe and complex ASD needs in the overall numbers provided for. None of the pupils currently attending the school will be displaced, and it is expected that as a result of this change that there will be a positive impact on the outcomes of those pupils who attend the school. Increasing the age range, the nature of need and the number of pupils will give greater flexibility in placing students, especially those on the autistic spectrum. It will also increase parental choice as the existing categories within the special schools preclude parents choosing one school over another.
- 8.2 There will be an increase in the number of staff engaged at the school to provide appropriate specialist knowledge, expertise and support to cover the expected increase in numbers, to provide a full curriculum, and the change in pupil need.
- 8.3 The proposals will enable Medway Council to offer places to pupils previously placed out of area or in independent provision, which means not only a cost saving but more importantly will lead to better overall control of the coordination of SEN provision, not only within Bradfields itself but across Medway. This will ensure that the council are in a stronger position to monitor the quality of the delivery of the provision. This in turn will improve the outcomes for children according to their individual needs by:
- providing settings with skilled staff able to provide high quality teaching, with access to specialist help, support and guidance;
 - giving access to an early years Foundation Stage curriculum that addresses learning needs;
 - by enabling closer ties between education professionals and parents/carers taking into account the views of individual parents/carers in respect of their child's particular needs.
- 8.4 'Special Educational Needs – An inclusive policy and strategy for Medway 2009-2014' includes the following fundamental principles for SEN in Medway, which these proposals take into account and aim to fulfil:
- a child with special educational needs should have their needs met;

- the special educational needs of most children will normally be met in a mainstream school;
 - children's needs will be met in an appropriate provision;
 - parents and carers have a vital role to play in supporting their child's education;
 - the views of the child should be asked and taken into account;
 - children with special educational needs deserve full access to a broad, balanced and relevant curriculum with clear post 16 progression routes and options
- 8.5 Further benefits of these proposals mean that pupils could remain local to their homes, which means being closer to their families, giving the opportunity for the pupils to feel better integrated into their community.
- 8.6 It is not expected that the proposals will have a detrimental impact upon the numbers or standards at Medway's other special schools, as the proposed ASD unit is viewed as being an expansion of overall provision to fill a necessary gap where pupils who are autistic with extremely challenging behaviour may not be receiving the appropriate education. This will create a better opportunity for vulnerable children of varying needs across Medway, to be placed at whichever school offers the most appropriate provision.
- 8.7 The proposals will increase diversity and choice across Medway's special educational provision by offering more places to a wider base of pupils with a wider range of need, promoting equality of opportunity for vulnerable pupils. The proposal will support the council's aims of improving community cohesion, inclusion and social regeneration.

9 Children and Young People Overview and Scrutiny Committee

- 9.1 Medway Council's Children and Young People Overview and Scrutiny Committee, considered the outcomes and responses of the consultation period at its meeting of 6 December 2011.
- 9.2 Following an introduction of the report from officers, Members asked officers a number of questions, which included: -
- Confirmation that extra staff costs would be funded by the Dedicated Schools Grant (DSG);
 - Concern that the proposals were not being done in line with the Special Educational Needs (SEN) strategic planning;
 - Concern about the wide age range of students on one site;
 - Request that the reference to views of children, which had been omitted from paragraph 8.4 of the report, be included in the report to Cabinet;
 - Clarity of savings from resultant reduced costs of SEN transport and independent placements to be included in the Cabinet report and that these savings should be ring-fenced for services to this group of children and young people.
- 9.3 In response, Officers explained that the proposals were in line with the SEN strategic planning and confirmed that proposals were being put

forward now because there was an increase in need for places for children and young people with autistic spectrum disorders (ASD) who also present severe learning difficulties (SLD). In addition, the empty school site next to Bradfields would deteriorate rapidly if it was not utilised. Furthermore, the SEN Strategic planning would have to be done in phases due to funding streams and this was seen as part of the phasing towards that. It was therefore requested that this be made clearer in the report to Cabinet.

- 9.4 Officers also explained that the wide age range was to enable spaces for very young children with ASD and SLD, as there were no spaces for these children, and would provide the school with the capacity to support young people with the transition into adulthood.
- 9.5 In relation to savings from reduced SEN transport and independent placement costs, officers explained that until the students were identified that would use the new unit they could not give specific figures, but would provide an estimated saving for the Cabinet report, as requested by the committee.
- 9.6 The committee recommended the report to Cabinet, subject to a number of additions which have been reflected in this report: -
- Clarity in paragraph 3.3 on the alignment these proposals have to the SEN strategic planning;
 - Reference to the child's views added to paragraph 8.4;
 - The inclusion at paragraphs 14.4/5 of estimated savings being included in relation to reduced SEN transport and independent placement costs and that these savings be ring-fenced for services for children and young people with special educational needs.

10 Diversity Impact Assessment

- 10.1 A Diversity Impact Assessment screening form is attached as Appendix 2. The DIA looks at how the proposed changes could impact upon various groups. The report shows that there could potentially be some impact upon certain groups based upon age and disability, however it shows that any impacts are expected to be positive ones.

11 Impact of the proposal on arrangements for looked after children

- 11.1 Looked after children receive the highest priority for admission to other schools. If necessary, the Admissions Code allows the council to place looked after children in schools that would otherwise be deemed to be full. This ensures that the council can secure appropriate provision for children that are looked after by the local authority. This strategy covers both mainstream and special schools and as such includes Bradfields.

12 Publication of a statutory notice

- 12.1 If Cabinet accepts the recommendation to pursue the proposals further, it would be necessary to publish statutory notices and formal proposals of the proposed changes to Bradfields Community Special School, by way of

prescribed alterations, to provide an opportunity for formal objection. This would run for a six-week period from 9 January 2012 through to 19 February 2012. The process would follow the guidelines set out in “Making changes to a Maintained Mainstream School (A guide for Local Authorities and Governing Bodies)”, and “The School Organisation (Prescribed Alterations to Maintained Schools) (England) Regulations 2007”.

13 Risk management

13.1 The following risks arise if the proposals as stated in this report are not implemented. These are principally:

- A risk that the opportunity to provide a specialist provision for those Autistic pupils who also have severe learning difficulties would be lost, and that some or all of these children would continue to be placed in provision that may not be appropriate for them, or for the other children around them
- A risk that without the additional provision which will be provided as a result of these prescribed alterations, Medway will continue to have to place some pupils out of area at considerable cost.
- A risk that it could undermine the council’s need to ensure the most effective use of resources, and in turn raise standards across all schools.

13.2 The council has both a moral and statutory duty to promote high standards and to ensure the sustained viability of its schools.

14 Financial and Legal implications

14.1 Funding for our schools comes from central Government via the local authority in the form of the dedicated schools grant, which is a ring-fenced sum of money for the provision of education across all of our schools. This money can only be used for schools (and certain specified services to schools), and cannot be used to fund other council services.

14.2 To complement the prescribed alterations some adaptation, remodelling and extension of the former Ridge Meadow buildings will be required. On 24 February 2011 Council approved £1.5m to be allocated from capital receipts to fund the project. A detailed plan is being developed for approval prior to the procurement process, following the Council’s Gateway process. This funding is in addition to the monies available from the dedicated grant, from which other SEN projects will be funded.

14.3 Under current arrangements some pupils who live within Medway are placed in alternative schools outside of the Local Authority due to lack of appropriate provision in Medway. Expanding the age range, categories of need, and number of pupils as proposed, gives the opportunity to reduce the number of pupils sent out of area, and provides a significant cost saving, which can then be invested in Medway’s special schools to further improve quantity and quality of provision.

14.4 It is expected that the proposed 40 additional places at an expanded Bradfields would have a similar SEN profile as the existing school, i.e. 72% level 5 and 28% level 6. Based upon a comparison of the average cost of independent placements at both level 5 and level 6, against the costs of purchasing special school places via the funding formula, it is estimated that revenue savings of £710,000 could be achieved. This is illustrated in the table below for 2012/13 with projections for future years. The costs used for the future years projections are based upon the current known costs.

| | Unit Costs | | Total Costs | | |
|----------------------------------|----------------------------|-----------------------------|----------------------------|-----------------------------|------------------------------|
| | Independent Sector £ pa | Expanded Bradfields £ pa | Independent Sector £ pa | Expanded Bradfields £ pa | Estimated Net Saving £ pa |
| 2012/13 | | | | | |
| 29 children at SEN level 5 (72%) | 27,100 | 10,684 | 785,900 | 309,836 | 476,064 |
| 11 children at SEN level 6 (28%) | 37,285 | 15,956 | 410,135 | 175,516 | 234,619 |
| Total costs for 40 children | | | 1,196,035 | 485,352 | 710,683 |

| | Unit Costs | | Total Costs | | |
|----------------------------------|----------------------------|-----------------------------|----------------------------|-----------------------------|------------------------------|
| | Independent Sector £ pa | Expanded Bradfields £ pa | Independent Sector £ pa | Expanded Bradfields £ pa | Estimated Net Saving £ pa |
| 2013/14 | | | | | |
| 20 children at SEN level 5 (50%) | 27,100 | 10,684 | 542,000 | 213,680 | 328,320 |
| 20 children at SEN level 6 (50%) | 37,285 | 15,956 | 745,700 | 319,120 | 426,580 |
| Total costs for 40 children | | | 1,287,700 | 532,800 | 754,900 |

| | Unit Costs | | Total Costs | | |
|----------------------------------|----------------------------|-----------------------------|----------------------------|-----------------------------|------------------------------|
| | Independent Sector £ pa | Expanded Bradfields £ pa | Independent Sector £ pa | Expanded Bradfields £ pa | Estimated Net Saving £ pa |
| 2014/15 | | | | | |
| 14 children at SEN level 5 (35%) | 27,100 | 10,684 | 379,400 | 149,576 | 229,824 |
| 22 children at SEN level 6 (55%) | 37,285 | 15,956 | 820,270 | 351,032 | 469,238 |
| 4 children at SEN level 7 (10%) | 50,283 | 24,376 | 201,132 | 97,504 | 103,628 |
| Total costs for 40 children | | | 1,400,802 | 598,112 | 802,690 |

14.5 The education of more pupils within Medway, instead of independent and non-maintained provision, would lead to savings in transport costs. It is estimated that savings in 2012/13 would be approximately £7,920. Future savings, based upon current transport costs could rise to approximately £21,000 per year.

14.6 The Children and Young People Overview and Scrutiny Committee recommended that any revenue savings arising from the expansion of Bradfields School to accommodate children, who may otherwise have been placed in provision outside Medway in order to meet their needs, should be ringfenced for services for children and young people with special educational needs. In considering this recommendation, Cabinet are reminded that whilst any savings made on SEN placements would remain within the centrally retained DSG and would therefore be afforded a degree of ringfencing anyway, the SEN transport budget is part of the General Fund and agreement regarding any efficiencies would be a matter for Cabinet.

- 14.7 The council has the power under sections 18 and 19 of the Education and Inspections Act 2006 to make “prescribed alterations” to a maintained school. The procedure for making prescribed alterations is set out in the School Organisation (Prescribed Alterations to Maintained Schools) (England) Regulations 2007. Before publishing a statutory notice relating to proposals to make prescribed alterations to a school, the council must undertake the consultation required by Schedule 5 of these regulations.

15 Recommendations

- 15.1 The Cabinet is requested to consider the responses and comments outlined in this report, as well as those recommendations from the Children and Young People Overview and Scrutiny Committee, and to approve a six-week period of statutory representation, where formal notices and proposals, as set out in paragraph 3.1 of this report, will be published to provide an opportunity for formal objection and comment.
- 15.2 The Cabinet is also requested to approve that should no objections be raised during the statutory period, the determination on the proposals be delegated to the Director of Children and Adults, in consultation with the Portfolio Holder for Children’s Services. However if any objections are received during that time then the decision will revert to Cabinet.

16 Suggested reasons for the decision

- 16.1 To ensure that the Council’s commitment to an all age range autism unit (as set out in section 2.4) can be fulfilled.
- 16.2 To provide for pupils currently placed in out of area or inappropriate provision, within a setting that offers the best education possible for autistic pupils with severe learning difficulties.
- 16.3 To enable the council to make the financial savings as set out in the tables in paragraph 14.4, which could be reinvested back into Medway’s special educational provision to further improve the quality of learning.
- 16.4 To enable the council to offer a wider range of appropriate SEN provision across Medway, which will improve the outcomes for vulnerable children according to their individual needs.

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Background papers

Making changes to a Maintained Mainstream School (A guide for Local Authorities and Governing Bodies).

Special Educational Needs – An inclusive policy and strategy for Medway 2009-2014.

The School Organisation (Prescribed Alterations to Maintained Schools) (England) Regulations 2007.

Appendices

- 1) List of consultees
- 2) Diversity Impact Assessment screening form
- 3) Consultation document

| Consultation Documents for Bradfields |
|--|
| All Councillors which include the Leader, Portfolio Holders, Cabinet and Overview & Scrutiny Members |
| All Local MPs |
| Managing Director of Children, Families & Education Directorate at Kent County Council |
| Rochester Diocese |
| Southwark Diocese |
| Medway Youth Parliament |
| Chief Executive of Medway Council |
| Directors of Medway Council |
| Senior Management Team of Medway Council |
| All Governors, Staff & Parents of Bradfields School |
| All Chairs of Governors at Medway Schools |
| All Headteachers at Medway Schools |
| All Medway Schools- Infant, Junior, Primary, Secondary & Special, including academies |
| Medway Early Years Provider |
| All Preschools, Nurseries & Playgroups |
| All Medway Minority Ethnic Groups |
| All Medway Libraries, Leisure Centres & Contact Points |
| Medway Council Press Office |
| Director of Primary Care- Medway Primary Care Trust |
| Chief Executive of Medway NHS Foundation Trust |

On;
 Schools Forum
 Medway Website
 In;
 Local press
 SIB
 On show at;
 Local libraries
 Leisure centres

Diversity Impact Assessment: Screening Form

| | | | |
|---|--|---|--|
| Directorate | Name of Function or Policy or Major Service Change | | |
| Children and Adults Services. | Change to upper and lower age limits, expansion of SEN categories, and increase in pupil numbers at Bradfields Community Special School | | |
| Officer responsible for assessment | Date of assessment | New or existing? | |
| Paul Clarke | 10 November 2011 | New | |
| Defining what is being assessed | | | |
| 1. Briefly describe the purpose and objectives | The proposals are to extend the age range from 11-19 to 3-25, and to add Severe Learning Difficulties (SLD) to the SEN provision, and to increase the pupil numbers by a maximum of 40, at Bradfields Community Special School. The proposals are in line with the Medway Vision as stated in 'Special Educational Needs – An inclusive policy and strategy for Medway 2009-2014', which flows from the Medway Children and Young People's Plan. | | |
| 2. Who is intended to benefit, and in what way? | As a consequence of the proposals it is expected that the outcomes for the children and young people who attend the school, and across Medway as a whole, particularly those with special educational needs and their families will be positive. | | |
| 3. What outcomes are wanted? | To enable Bradfields Community Special School to provide suitable education for pupils with MLD as is current, but also for ASD pupils with extreme challenging behaviour who have been identified as having SLD too. | | |
| 4. What factors/forces could contribute/detract from the outcomes? | Contribute Reassurance of staff, pupils and parents will lead to greater confidence in the schools ability to provide the appropriate level of education for all pupils. | Detract Resistance from some parents unaware of how the changes could affect their children who already attend the school. | |
| 5. Who are the main stakeholders? | The pupils, parents, governors and staff of Bradfields Community Special School, and the local community. | | |
| 6. Who implements this and who is responsible? | Rose Collinson- Director of Children and Adults Services | | |

| Assessing impact | | |
|--|---|-------------------------------|
| 7. Are there concerns that there <u>could</u> be a differential impact due to <i>racial groups</i>? | | Brief statement of main issue |
| | NO | |
| What evidence exists for this? | No pupils are intended to be displaced and numbers of staff will need to increase as part of this proposal. A public consultation has been carried out over a 7-week period when views were expressed and any concerns regarding this issue could have been raised. Of a number of concerns raised and comments made, none related to the potential for any differential impact due to racial groups. Local authorities have a statutory duty to promote equality and all schools in Medway are responsible for ensuring equality in their schools and for promoting community cohesion. | |
| 8. Are there concerns that there <u>could</u> be a differential impact due to <i>disability</i>? | YES | Brief statement of main issue |
| | | |
| What evidence exists for this? | None of the current pupils are intended to be displaced and there will be no reduction to staff numbers made as part of this proposal. There is however likely to be an increase in the number of pupils who attend the school and with a wider range of need. It is expected that these extra pupils will benefit from having specialist provision and support in a local setting, and as such it is expected that the outcomes for these pupils will be positive. A public consultation has been carried out over a 7-week period when views were expressed and concerns regarding this issue raised. Some of the responses held the view that to avoid any negative impact on children with disabilities, appropriately trained and experienced staff would need to be in place. Other comments and concerns were worried that the age range would be too wide, and that pupils individual needs may be affected, and standards could fall. Local authorities have a statutory duty to promote equality and all schools in Medway are responsible for ensuring equality in their schools and for promoting community cohesion. | |
| 9. Are there concerns that there <u>could</u> be a differential impact due to <i>gender</i>? | | Brief statement of main issue |
| | NO | |
| What evidence exists for this? | None of the current pupils are intended to be displaced and staff numbers expected to increase as | |

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| | | part of this proposal. Pupils will attend the school on the basis of need irrespective of their gender. A public consultation was carried out over a 7-week period when views were expressed and any concerns regarding this issue raised. There were no concerns highlighted where there could be a differential impact due to gender. Local authorities have a statutory duty to promote equality and all schools in Medway are responsible for ensuring equality in their schools and for promoting community cohesion. |
| 10. Are there concerns there <u>could</u> be a differential impact due to <i>sexual orientation</i>? | | Brief statement of main issue |
| | NO | |
| What evidence exists for this? | | None of the current pupils are intended to be displaced and staff numbers expected to increase as part of this proposal. Pupils will attend the school on the basis of need irrespective of their sexual orientation. A public consultation was carried out over a 7-week period when views were expressed and any concerns regarding this issue raised. During the consultation no concerns were raised regarding the impact there could be due to sexual orientation. Local authorities have a statutory duty to promote equality and all schools in Medway are responsible for ensuring equality in their schools and for promoting community cohesion. |
| 11. Are there concerns there <u>could</u> be a have a differential impact due to <i>religion or belief</i>? | | Brief statement of main issue |
| | NO | |
| What evidence exists for this? | | None of the current pupils are intended to be displaced and staff numbers expected to increase as part of this proposal. Pupils will attend the school on the basis of need irrespective of their religion or belief. A public consultation was carried out over a 7-week period when views were expressed and any concerns regarding this issue raised. No concerns were indicated during the consultation that there could be a differential impact due to religion and belief. Local authorities have a statutory duty to promote equality and all schools in Medway are responsible for ensuring equality in their schools and for promoting community cohesion. |
| 12. Are there concerns there <u>could</u> be a differential impact due to people's <i>age</i>? | YES | Brief statement of main issue |
| | | |
| What evidence exists for this? | | None of the current pupils are intended to be displaced and staff numbers expected to increase as part of this proposal. However as the intention is to expand the age range for pupils who can attend the school, it would be expected that there will be some impact due to peoples age, however the impact |

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| | | would be expected to be a positive one, as there will be appropriate provision available to pupils according to their need and age. A public consultation was carried out over a 7-week period when views were expressed and any concerns regarding this issue raised. Some concerns were raised that there could be a negative impact on students at the school, as the wide age range could mean that children may not be able to mix with groups of people their own age, and this would have a detrimental effect on their progress and ability to mix amongst peers. Local authorities have a statutory duty to promote equality and all schools in Medway are responsible for ensuring equality in their schools and for promoting community cohesion. |
| 13. Are there concerns that there <u>could</u> be a differential impact due to <i>being transgendered or transsexual</i>? | | Brief statement of main issue |
| | NO | |
| What evidence exists for this? | | None of the current pupils are intended to be displaced and staff numbers expected to increase as part of this proposal. Pupils will attend the school on the basis of need irrespective of any transgender or transsexual issues. A public consultation was carried out over a 7-week period when views were expressed and any concerns regarding this issue raised. No concerns were highlighted during the consultation that there could be any differential impact due to people being transgendered or transsexual. Local authorities have a statutory duty to promote equality and all schools in Medway are responsible for ensuring equality in their schools and for promoting community cohesion. |
| 14. Are there any <i>other</i> groups that would find it difficult to access/make use of the function (e.g. young parents, commuters, people with caring responsibilities or dependants, young carers, or people living in rural areas)? | | If yes, which group(s)? |
| | NO | |
| What evidence exists for this? | | N/A |
| 15. Are there concerns there <u>could</u> have a differential impact due to <i>multiple discriminations</i> (e.g. disability <u>and</u> age)? | | Brief statement of main issue |
| | NO | |
| What evidence exists for this? | | All aspects of the policy described above will address the needs of children/young people who may have multiple issues affecting them. |

| Conclusions & recommendation | | |
|--|--|---|
| 16. Could the differential impacts identified in questions 7-15 amount to there being the potential for adverse impact? | | Whilst some concerns were raised about the wide age range, the school will employ the services of experienced staff who will have been trained to work with pupils with the relevant needs and age bracket, and so no adverse impact would be expected. The rationale behind the changes is to ensure that appropriate provision is available for children who have been designated as ASD but who also have extreme challenging behaviours, where none is currently available in Medway. |
| | NO | |
| 17. Can the adverse impact be justified on the grounds of promoting equality of opportunity for one group? Or another reason? | | Please explain |
| | NO | |
| Recommendation to proceed to a full impact assessment? | | |
| NO | This function/ policy/ service change complies with the requirements of the legislation and there is evidence to show this is the case. | |
| NO | What is required to ensure this complies with the requirements of the legislation? (see DIA Guidance Notes)? |) |
| N/A | Give details of key person responsible and target date for carrying out full impact assessment (see DIA Guidance Notes) | |

| Action plan to make Minor modifications | | |
|--|--|----------------------------|
| Outcome | Actions (with date of completion) | Officer responsible |
| | | |
| | | |
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| | | |

| Planning ahead: Reminders for the next review | | |
|--|-------------|--|
| Date of next review | | |
| Areas to check at next review (e.g. new census information, new legislation due) | | |
| Is there <i>another</i> group (e.g. new communities) that is relevant and ought to be considered next time? | | |
| Signed (completing officer/service manager) | Date | |
| Signed (service manager/Assistant Director) | Date | |



Public Consultation Document

**Bradfields Community Special School,
Churchill Avenue, Chatham, Kent ME5 0LB**
*Extension to SEN categories, and increase
to age range and pupil numbers*

September 2011

Extension to SEN categories, and increase to age range and pupil numbers at Bradfields Community Special School, Churchill Avenue, Chatham, Kent ME5 0LB

This document is designed to:

- Notify you of Medway Council's proposals to make prescribed alterations at Bradfields Community Special School which will:
 - 1) Extend the special educational needs categories;
 - 2) Increase the upper and lower age limits; and;
 - 3) Increase the number of pupils provided for
- Explain why these changes are being proposed
- Invite your comments on these proposals

Why are the alterations to Bradfields School being proposed?

Bradfields is a community special school, which currently provides education for pupils with Moderate Learning Difficulties (MLD) and Autistic Spectrum Disorder (ASD) between the ages of 11 and 19, who are too complex to be supported within a mainstream setting.

From September 2011 Bradfields School will expand into additional buildings on the former Ridge Meadow site, which is adjacent to the main Bradfields School in Churchill Avenue, Chatham. At the same time the sixth form will relocate from its current base at Brompton Academy onto the main school site.

In February 2011, Full Council declared their commitment to developing an all age range autism provision on the former Ridge Meadow site, which will provide specialist education and support for a maximum of 40 extra pupils. This will enable more pupils to be placed at Bradfields where it is the most appropriate provision, thereby reducing the numbers of pupils needing to be placed outside of Medway at significant cost. However where pupils needs cannot be best met at Bradfields they will continue to be placed in the most appropriate setting.

Often very autistic young people will also have been identified as SLD (Severe Learning Difficulties), and the new autism provision will aim to meet the needs of this group of children. By extending the categories provided for to include SLD we will ensure that increased and appropriate provision is available in Medway for those autistic pupils with SLD, which reflects the changing profile of the school population.

The lower and upper age limits at the school are proposed to expand to 3 and 25. It is expected that there will be an increase in the numbers of pupils with severe and complex ASD needs. Increasing the age range as well as the nature of need will give greater flexibility in placing students, will increase parental preference, and will enable delivery of the council's commitment to ASD development.

The proposals will enable Medway Council to offer places to pupils previously placed out of area or in independent provision, which means not only a cost saving but more importantly will lead to better overall control of the coordination of SEN provision, not only within Bradfields itself but across Medway as a whole, and will ensure that the council is in a stronger position to monitor the quality of the delivery of the provision. It is expected that this will improve the outcomes for children according to their individual needs by;

- providing settings with skilled staff able to provide high quality teaching, with access to specialist help, support and guidance;
- giving access to an early years Foundation Stage curriculum that addresses learning needs;
- enabling closer ties between education professionals and parents/carers taking into account the views of individual parents/carers in respect of their child's particular needs.
- enabling pupils to be educated locally to their homes, which means being closer to their families and giving the opportunity for them to feel better integrated into their community.
- promoting equality of opportunity for vulnerable pupils.

There will need to be an increase in the number of staff engaged at the school to provide the appropriate specialist knowledge, expertise and support to cover the expected increase in pupil numbers, to provide a full curriculum and the change in pupil need.

The proposals are in line with the Medway vision as stated in 'Special Educational Needs - An Inclusive Policy and Strategy for Medway 2009-2014', which is consistent with, and flows, from the Medway Children and Young Peoples Plan.

The Policy states the fundamental principles for SEN in Medway to be;

- a child with special educational needs should have their needs met
- the special educational needs of most children will normally be met in a mainstream school
- children's needs will be met in an appropriate provision
- the views of the child should be sought and taken into account
- parents/carers have a vital role to play in supporting their child's education
- children with special educational needs deserve full access to a broad, balanced and relevant curriculum with clear post 16 progression routes and options.

Medway Council is seeking to implement the alterations at the school on or before 1 September 2012.

The next stages

Comments on this proposal will be presented to Medway Council's Cabinet on 20 December 2011. The Cabinet may decide not to proceed with the proposal, or to authorise statutory notices to be published, which will give interested parties the opportunity to object or comment.

If there are no objections to the statutory notice Medway Council can decide to go ahead with the proposals. If there are one or more objections, Medway Council as Schools Commissioner, under the Education and Inspections Act 2006, will consider the objections before determining the outcome.

| | |
|---|--------------------------------|
| Public consultation period | 19 September – 6 November 2011 |
| Report outcome of consultation to Cabinet | 20 December 2011 |
| Statutory notice period | 9 January - 19 February 2012 |
| New designations, age range and pupil numbers to apply from | 1 September 2012 |

No decisions will be made until the consultation has been completed and local views have been carefully considered.

How to make comments

We would like to hear your views on these proposals. Please let us know by:

- Completing the reply slips at the end of this leaflet or by writing a letter to:

**School Organisation and Student Services
Medway Council
FREEPOST RRUY-ZBTJ-CZZC
Level 4, Gun Wharf
Dock Road
CHATHAM ME4 4TR**

Alternatively hand the form or letter in at the School Office at Bradfields School, who will forward it on your behalf.

Letters and slips must be received by **Sunday 6 November 2011**.

Unfortunately it will not be possible to acknowledge receipt.

Extension to SEN categories, and increase to age range and pupil numbers at Bradfields Community Special School, Churchill Avenue, Chatham, Kent ME5 0LB

REPLY SLIP

Please complete this form, and add any comments you wish below.
Forms and letters should reach us by **Sunday 6 November 2011**.

Please return to:

**School Organisation and Student Services
Medway Council
FREEPOST RRUY-ZBTJ-CZZC
Level 4, Gun Wharf
Dock Road
CHATHAM ME4 4TR**

Alternatively hand the form or letter in at the School Office at Bradfields School, Churchill Avenue, Chatham who will forward it on your behalf.

1) The Proposal to extend the range of Special Educational Needs categories to include pupils with severe learning difficulties (SLD);

Please tick one box

I approve of the proposal to extend the range of Special Educational Needs categories at Bradfields School.

I object to the proposal to extend the range of Special Educational Needs categories at Bradfields School.

Please give your reasons as fully as possible. This will help careful consideration to be given to the arguments in favour and against the proposal.

It would be helpful to have the following information:

Name: _____

Address: _____

I am (please tick)

Parent / Guardian

Governor

Member of Staff

None of the above (please specify)

Comments

Please use this space to add any further comments

Extension to SEN categories, and increase to age range and pupil numbers at Bradfields Community Special School, Churchill Avenue, Chatham, Kent ME5 0LB

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Dock Road
CHATHAM ME4 4TR**

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2) The proposal to increase the age range to 3-25;

Please tick one box

I approve of the proposal to increase the lower and upper age limits from 11-19 to 3-25 at Bradfields School.

I object to the proposal to increase the lower and upper age limits from 11-19 to 3-25 at Bradfields School.

Please give your reasons as fully as possible. This will help careful consideration to be given to the arguments in favour and against the proposal.

It would be helpful to have the following information:

Name: _____

Address: _____

I am (please tick)

Parent / Guardian

Governor

Member of Staff

None of the above (please specify)

Comments

Please use this space to add any further comments

Extension to SEN categories, and increase to age range and pupil numbers at Bradfields Community Special School, Churchill Avenue, Chatham, Kent ME5 0LB

REPLY SLIP

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Forms and letters should reach us by **Sunday 6 November 2011**.

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Medway Council
FREEPOST RRUY-ZBTJ-CZZC
Level 4, Gun Wharf
Dock Road
CHATHAM ME4 4TR**

Alternatively hand the form or letter in at the School Office at Bradfields School, Churchill Avenue, Chatham who will forward it on your behalf.

3) The proposal to increase the number of pupils by a maximum of 40, for whom provision will be made at Bradfields School

Please tick one box

I approve of the proposal to increase the number of pupils provided for at an expanded Bradfields School.

I object to the proposal to increase the number of pupils provided for at an expanded Bradfields School.

Please give your reasons as fully as possible. This will help careful consideration to be given to the arguments in favour and against the proposal.

It would be helpful to have the following information:

Name: _____

Address: _____

I am (please tick)

Parent / Guardian

Governor

Member of Staff

None of the above (please specify)

Comments


Please use this space to add any further comments



Who to contact

 School Organisation and Student Services, Medway Council, Level 4, Gun Wharf, Dock Road, Chatham ME4 4TR

 Email: prim.reorg@medway.gov.uk Website: www.medway.gov.uk/educationlearning

 Minicom: **01634 333111**

This information can be made available in other formats from **01634 333333**

If you have any questions about this leaflet and you want to speak to someone in your own language please ring **01634 335577**

| | | | | | | | | | | | |
|-------|--------|---------|--------|--------|--------|------------|--------|-------|--------|-------------|--------|
| বাংলা | 331780 | ગુજરાતી | 331782 | ਪੰਜਾਬੀ | 331784 | کوردی | 331841 | أروو | 331785 | Русский | 332374 |
| 中文 | 331781 | हिंदी | 331783 | Polski | 332373 | ଏକ୍ସକ୍ସକ୍ସ | 331786 | فارسی | 331840 | Lietuviškai | 332372 |