



Derby City Council

**COUNCIL CABINET**  
**10 October 2018**

Report of the Strategic Director of People  
Services

# ITEM 10

## **Improving Special Educational Needs and Disability (SEND) Provision in Derby**

### **SUMMARY**

- 1.1 The Council has an important role in championing the needs of vulnerable children in Derby, and ensuring the continued inclusion of children with special needs in all of our schools in the city. The Department for Education also requires Local Authorities to consider Special Educational Needs and Disabilities (SEND) provision in the context of meeting the national SEND reforms.
- 1.2 It is important to note that, under the SEND Code of Practice, every school is required to identify and address the needs of the pupils that they support. This was emphasised in the Secretary of State's speech on 5 July 2018 in that 'every school is a school for pupils with SEND; and every teacher is a teacher of SEND pupils'.
- 1.3 Following very careful consideration and initial consultation with parent representatives, Special Educational Needs and Disabilities (SEND) partners and headteachers, proposals were developed to improve Derby's specialist provision for children and young people with SEND and to help support parents, carers and families. The key proposals related to the following:
  - a. Enhanced Resource School and Special School Placement Criteria;
  - b. A fresh look at specialist provision to ensure it is relevant to current needs of children and young people in Derby;
  - c. Improving SEND pupil pathways between primary and secondary Enhanced Resource School placements to help effective transition planning for children;
  - d. Developing an Early Years Inclusion Fund for all Early Years providers;
  - e. Capital investment to increase and improve Enhanced Resource School provision.
- 1.4 Consultation on the proposals took place over a six week period between 6 November 2017 and 15 December 2017. In total, 425 consultation responses were received. All comments have been grouped into categories and themes for analysis. A detailed summary of the responses received is set out in Appendix 2. In addition, full consultation responses have been made available to all Cabinet Members.

1.5 The consultation exercise has been extremely helpful. Following very careful consideration of all consultation responses, and in view of the requirement to deliver the national SEND reforms, the key proposals are as follows:

- To update the placement criteria for Special Schools and Enhanced Resource Schools from September 2019, including a single set of criteria for St Andrew's School, St Clare's School, St Giles School and St Martin's Schools, as set out in Appendix 3.
- To establish pupil pathways for Enhanced Resource Schools from September 2019, as set out in Appendix 4.
- To start the initial scoping of pupil pathways for Special Schools including in relation to proposals to consider changing the age range of St Clare's School from a secondary special school to a primary special school.
- To review the number of commissioned places in each of Derby's Enhanced Resource Schools and nursery schools, to ensure that capacity meets with demand for places, as set out in Appendix 5.
- To change the number of ERS commissioned places for Brackensdale ER Primary School to 28 places for pupils with communication and interaction needs from September 2019, with additional funding and financial protection to remain in place as part of the transition process until March 2021.
- To identify alternative options for providing places for pupils with Social, Emotional and Mental Health (SEMH) needs, including proposals to start carefully planning the de-commissioning of the current provision at Alvaston Junior School and the 11-16 provision at Lees Brook School from March 2019. Subject to approval, the Council will not make any further placements in the Enhanced Resource School provision at Alvaston Junior School and Lees Brook School from September 2019 but will continue to fund places for pupils currently on roll in the provision as they move through the schools. Discussions will take place with the schools in due course as part of transition planning and de-commissioning arrangements.
- To reallocate the Enhanced Resource School funding provided to Central Community Nursery School (£142,055) and Lord Street Nursery School (£110,000), totalling £252,055, to a single Early Years Inclusion Fund which Maintained Mainstream Settings and Private, Voluntary and Independent (PVI) settings can make applications to in order to provide additional support for early years children with SEND across the city. This includes proposals to start carefully planning the de-commissioning of the current provision at Central Community Nursery School and Lord Street Nursery School to take effect from September 2020.
- To work in close partnership with The Bemrose School to establish 14 primary Enhanced Resource School places at the school for pupils with communication

and interaction needs.

- To commence feasibility studies for increasing and improving provision at Bemrose School and St. Clare's School, with a view to making an estimated capital investment of around £7.2m across the two schools to help support the schools in meeting the individual needs of pupils with SEND, in view of the proposed changes to the placement criteria and number of commissioned places.

- 1.6 As part of the Council's ongoing commitment to improving specialist provision, exceptional needs funding has already been established, as additional funding, for those pupils with very complex needs who are at risk of being placed out of the city. The exceptional needs funding was made available for all Derby special schools from April 2017 onwards. In addition, through the SEND funding banding changes, the Council has, overall, committed significant additional funding of £911,000 for our special schools and enhanced resource schools over a three year period from April 2018. The additional funding has been committed to help support the implementation of the proposals to improve Derby's specialist provision.
- 1.7 Subject to approval of the proposals, to ensure the effective implementation of the strategy and to support parents, it is considered important for Derby City Council to be responsible for coordinating all SEND placements in Derby. This will help ensure a consistent and coordinated approach and that pupils are placed in the most appropriate setting based on level of need.
- 1.8 It is important to note that no existing pupil placements will be affected by the proposals.

## **RECOMMENDATIONS**

- 2.1 Following very careful consideration of consultation responses on proposals to improve Derby's specialist provision, and in view of the requirements of the national SEND reforms, to approve:
- a. the proposed updated placement criteria from September 2019, as set out in Appendix 3;

- b. the proposed Enhanced Resource School pupil pathways from September 2019, as set out in Appendix 4;
  - c. the updated numbers of commissioned places in each of Derby's Enhanced Resource Schools from September 2019, as set out in Appendix 5.
  - d. a change in number of Enhanced Resource School places for Brackensdale ER Primary School to 28 commissioned places from September 2019, with additional funding to remain in place as part of the transition process until March 2021;
  - e. consideration of alternative options for providing places for pupils with Social, Emotional and Mental Health (SEMH) needs including proposals to start planning the de-commissioning of the current provision at Alvaston Junior School and the 11-16 provision at Lees Brook School;
  - f. the reallocation of the funding provided to Central Community Nursery School and Lord Street Nursery School to a single Early Years Inclusion Fund, including proposals to start planning the decommissioning of the Enhanced Resource School places at Central Community Nursery School and Lord Street Nursery School;
  - g. to establish 14 primary Enhanced Resource School places at the Bemrose School for pupils with communication and interaction needs;
  - h. Derby City Council being solely responsible for coordinating all SEND placements in Derby.
- 2.2 To approve the commencement of feasibility studies for increasing and improving provision at Bemrose School and St. Clare's School, with a view to making estimated capital investment of around £7.2m across the two schools.
- 2.3 To approve scheme commencement and amendment to the approved 2018/19 - 2020/21 capital programme with proposed scheme allocations as set out in Appendix 7.
- 2.4 To approve the scoping of initial proposals to establish special school pupil pathways, including initial proposals to consider changing the age range for St Clare's School from a secondary special school to a primary special school, and to seek Council Cabinet approval of the proposals, following this scoping exercise.
- 2.5 To note that a SEND Graduated Response Strategy for inclusion has been developed for consideration and Council Cabinet approval in a separate report.
- 2.6 To endorse the Council's approach of requiring all mainstream schools and enhanced resource schools to set separate budget plans in relation to prioritising SEND notional funding, and enhanced resource school funding from 2018-19 and future years.
- 2.7 To note that, subject to approval of the specialist provision proposals in recommendation 2.1 (above), Service Level Agreements (SLAs) will be updated to reflect the SEND changes for Special Schools and Enhanced Resource Schools.

## REASONS FOR RECOMMENDATION

- 3.1 Following careful consideration of the consultation responses, and in view of the requirements of the national SEND reforms, the recommendation is to approve the updated specialist provision proposals. Detailed information on each of the proposals is set out in the supporting information section of this report.
- 3.2 For The Bemrose School and St Clare's School, it is proposed that capital investment is allocated to provide appropriate accommodation to meet the needs of children and young people based on the proposed changes to placement criteria and number of commissioned places.
- 3.3 The consultation document on the proposals acknowledged the need for further consideration to be given to special school pupil pathways and consultation responses supported this. As a result, the Council has continued work on developing initial proposals for creating special school pupil pathways, with aligned pupil placement criteria in relation to St Giles, St Andrews, St Clare's and St Martins Special Schools.
- 3.4 In accordance with Financial Procedure Rules, amendments to the Council's capital programme are required to be reported to Cabinet
- 3.5 The Graduated Response Inclusion Strategy provides support to all schools and clarity around the process and criteria for determining the level of provision needed to effectively support an individual pupil's progress. The strategy incorporates the 'assess', 'plan', 'do' and 'review' cycle as outlined in the SEND Code of Practice 0-25.
- 3.6 The Council has requested that all mainstream schools and enhanced resource schools set separate budget plans in relation to prioritising SEND notional funding and enhanced resource school funding to ensure that they are able to clearly demonstrate how the funding has been prioritised specifically for children with SEND. This also helps ensure transparency for parents and carers in relation to a school's continuing commitment to SEND and inclusion.
- 3.7 The Council continues to work in close partnership with all city schools and it is absolutely essential that all schools form part of the strategy to improve specialist provision. Given the importance of delivering the SEND reforms, SEND Vision for Derby and outcomes of the specialist provision review, it is considered essential that additional SEND requirements and principles are set out for Special Schools and Enhanced Resource Schools in Service Level Agreements (SLAs).

## SUPPORTING INFORMATION

### **Special Educational Needs and Disabilities (SEND): National Context**

- 4.1 The Children and Families Act 2014 secures the general presumption in law of mainstream education in relation to decisions about where children and young people with Special Educational Needs (SEN) should be educated and the Equality Act 2010 provides protection from discrimination for disabled people.
- 4.2 As set out in the Special Educational Needs and Disability (SEND) Code of Practice 0-25 years, all children and young people are entitled to an appropriate education, one that is appropriate to their needs, promotes high standards and the fulfilment of their potential. The aim is that children and young people with SEND will have aspirations that are as high as any other young person, they achieve well at school and college, and lead fulfilling, happy lives.
- 4.3 On 5 July 2018, the Secretary of State for Education addressed the Association of Directors of Children's Services (ADCS) at the Manchester Conference. The speech covered a range of areas, including:
- Safeguarding children;
  - SEND;
  - Alternative provision and exclusions;
  - Care leavers.
- 4.4 Some of the key message on SEND were as follows:
- There is a need to be more ambitious for the most vulnerable children and young people, helping them to overcome the difficult starts and disadvantages.
  - Around 15% of children have special educational needs. These are often the already vulnerable and disadvantaged children who are much more likely to be identified with these needs.
  - The gap in outcomes between children with SEND and other children is still far too wide.
  - There has been a steady movement of children with special educational needs out of mainstream schools and into specialist provision, alternative provision and home education.

- At the same time, rates of exclusion have begun to rise after a period of having calmed down.
  - Some schools find ways to remove pupils, outside of the formal exclusions system. This is essentially, pre-emptive exclusion, where parents looking at secondary schools are actively or in some way subtly discouraged from applying to a particular school for their child.
  - Every school is a school for pupils with SEND; and every teacher is a teacher of SEND pupils.
- 4.5 The speech included a range of measures to support and encourage mainstream inclusion. It is emphasised that mainstream schools and colleges – with the right support and training – should also be able to offer strong support for many more children and young people with Education, Health and Care Plans, as well as high quality SEN Support for those without plans.
- 4.6 The Government's aim is to equip and incentivise schools to do better for children and young people with SEND. Actions include working with Ofsted to make sure the system sufficiently rewards schools for their work with pupils who need extra support, and to encourage schools to focus on all pupils, not just the highest achievers. There is also a drive to increase efforts to help young people with SEND access opportunities that will help them find employment.
- 4.7 On 18 July 2018, the Education Select Committee published a report entitled 'Forgotten children: alternative provision and the scandal of ever increasing exclusions'. Some of the key message set out in the report were as follows:
- All pupils deserve high quality education, and while this is often the case, too many pupils are failed by the system and they are not receiving the education that they deserve.
  - Mainstream schools should be bastions of inclusion, and intentionally or not, this is not true of all mainstream schools. We have also seen an alarming increase in 'hidden' exclusions.
  - Some groups of children are more likely to be educated in alternative provision, or excluded, than other children. Children in care, children in need, children with special educational needs and disabilities (SEND) and children in poverty are all more likely to be excluded than their peers.
  - Pupils with SEN support are almost seven times more likely to be permanently excluded than pupils with no SEN.

4.8 The Education Select Committee Report included a number of recommendations to create much stronger rights for pupils who access alternative provision, and responsibilities for schools and local authorities. In summary, those recommendations included the following actions:

- Schools should not rush to exclude pupils: schools should be inclusive.
- Parents and pupils have a right to know how often schools resort to exclusion.
- Parents deserve more information when their children are excluded.
- When a pupil is excluded from school for more than five non-consecutive days in a school year, the pupil and their parents or carers should be given access to an independent advocate.
- Parents and pupils should be given accurate information about the range and type of alternative provision that is available locally.
- Independent Review Panels should be able to direct a school to reinstate pupils: legislation should be amended at the next opportunity so that this can happen.

#### **SEND: Derby Context**

4.9 There is a strong and clear commitment from the Council to inclusive education for children and young people with SEND in Derby. A SEND Vision for Derby has been developed working closely with partner organisations. The Vision sets out that children and young people with SEND want to:

- Be happy, healthy and safe with good relationships.
- Be informed about the choices they have available.
- Feel involved in setting their own goals and types of support.
- Be able to access the right support at the right time.
- Live independently and achieve their full potential.



4.10 In order to achieve these outcomes, the Council, schools, service providers and partners will need to work differently. There will be a need to:

- Help to keep children local wherever possible.
- Respond at the lowest level of need.
- Be honest and fair about decisions that we make.
- Deliver value for money.

### **Overview of Proposals to Improve Specialist Provision in Derby**

4.11 The Council has an important role in championing the needs of our vulnerable children in Derby, and ensuring continued inclusion of children with special needs in all of our schools in the city.

4.12 In developing proposals to improve specialist provision, very careful consideration has been given to a range of data and strategic documents including the SEND Joint Strategic Needs Assessment and SEND School Census data. This is attached as Appendix 6 to this report.

4.13 Following very careful consideration and initial consultation with parent representatives, Special Educational Needs and Disabilities (SEND) partners and headteachers, consultation proposals were developed to improve Derby's specialist provision for children and young people with SEND and to help support parents, carers and families. In summary, the key proposals were:

- a. To update Enhanced Resource School and Special School Placement Criteria;
- b. A fresh look at specialist provision to ensure it is relevant to current needs of children and young people in Derby.
- c. Improving SEND pupil pathways and alignment between primary and secondary Enhanced Resource School placements to help effective transition planning for Children.
- d. Developing an Early Years Inclusion Fund for all Early Years providers as a single source of funding to support the inclusion of early years children with SEND.
- e. Capital investment for Enhanced Resource School Provision.

- 4.14 As part of the Council's ongoing commitment to improving specialist provision, exceptional needs funding has already been established, as additional funding, for those pupils with very complex needs who are at risk of being placed out of the city. The exceptional needs funding was made available for all Derby special schools from April 2017 onwards. In addition, through the SEND funding banding changes, the Council has, overall, committed significant additional funding of £911,000 for our special schools and enhanced resource schools over a three year period from April 2018. The additional funding has been committed to help support the implementation of the proposals to improve Derby's specialist provision.
- 4.15 It is important to note that no existing pupil placements will be affected by the proposals.

## **Consultation**

- 4.16 Consultation on the proposals took place over a six week period between 6 November 2017 and 15 December 2017. As requested by the Children and Young People's Scrutiny Review Board on 30 October 2017, the proposals were made available in different formats including a parent and carer newsletter, frequently asked questions, and a summary version of the consultation document. The SEND Joint Strategic Needs Assessment was published alongside the consultation documents as the key source of data that was used in developing the proposals. This was done so that the different stakeholders could select the level of information that was right for them on the proposals.
- 4.17 In total, 425 consultation responses were received. The responses were submitted through different routes as follows:
- Online responses / Your City Your Say website: 254  
Paper based feedback forms from the consultation document: 46  
Letters and emails: 125  
Total: 425
- 4.18 All comments have been grouped into categories and themes for analysis. A detailed summary of the responses received is set out in Appendix 2. Full consultation responses have been made available to all Cabinet members.

- 4.19 The consultation exercise has been extremely helpful. Through the consultation, comments on the proposals arose predominantly in relation to the following key themes:
- a. Inclusion.
  - b. Placement Criteria and Pupil Pathways.
  - c. Special Schools.
  - d. Alvaston Junior School and Lees Brook School: Social, Emotional and Mental Health (SEMH) Provision.
  - e. Brackensdale ER Primary School: 'Mainstream' ERS places
  - f. Central Community Nursery School and Lord Street Nursery School: Early Years Specialist Provision.
  - g. Bemrose School (Primary Phase): Enhanced Resource School Provision for Pupils with Communication and Interaction Needs.
  - h. Enhanced Resource School Places.
- 4.20 A high level summary of the consultation responses is set out below, along with suggested changes to the initial specialist provision proposals, as a result of the Council carefully considering all responses. A more detailed summary of the responses is set out in Appendix 2.

**a. Inclusion**

- 4.21 Some concerns were raised in relation to mainstream schools being able to meet the needs with children with SEND and regarding funding, resources and training that would be available to support teachers in mainstream schools.

How the Council has responded

- 4.22 The comments are very helpful and the Council has carefully considered how it can provide support to mainstream schools and nurseries in meeting the individual needs of pupils with SEND.
- 4.23 It is important to note that, under the SEND Code of Practice, every school is required to identify and address the needs of the pupils that they support. This was emphasised in the Secretary of State's speech on 5 July 2018 in that 'every school is a school for pupils with SEND; and every teacher is a teacher of SEND pupils'.

- 4.24 A SEND Graduated Response Strategy has been also developed for consideration by Council Cabinet. (See separate report). This inclusion strategy sets out the steps to be taken by the Council and schools to support children and young people with SEND. It provides support to all schools and clarity around the process and criteria for determining the level of provision needed to effectively support an individual pupil's progress. The strategy incorporates the 'assess', 'plan', 'do' and 'review' cycle as outlined in the SEND Code of Practice 0-25.
- 4.25 All mainstream schools receive notional SEND funding within their individual school budgets. In Derby, around £23 million per year is allocated to mainstream schools, as part of their delegated budgets, as notional SEND funding.
- 4.26 In order to champion the needs of vulnerable children in Derby and inclusion, the Council has written to all mainstream school Chairs of Governors and Trusts requesting that, from the 2018/19 financial year, separate budget plans are set in relation to prioritising SEND notional funding so that they are able to clearly demonstrate how the funding has been prioritised specifically for children with SEND. This also helps ensure transparency for parents and carers in relation to a school's continuing commitment to SEND and inclusion. This funding will also be linked to supporting the proposed Graduated Response Strategy to ensure dedicated funding is prioritised to support all children with SEND, including meeting the specific requirements outlined in a child's Education Health Care Plan (EHCP).

#### **b. Placement Criteria and Enhanced Resource School Pupil Pathways**

- 4.27 Some changes were suggested in relation to the placement criteria and comments were made that the Enhanced Resource School pupil pathways shouldn't restrict choice around secondary education.

##### How the Council has responded

- 4.28 The suggestions in relation to the placement criteria have been very carefully considered. Updated criteria are attached, as Appendix 3.
- 4.29 With regard to pupil pathways, the aim is to provide an early indication to parents of where their child is likely to access secondary provision. It will also enable more formal links to be created between primary and secondary provision, including establishing a careful partnership approach between a primary school and secondary school to ensure that a pupil's transition from primary to secondary education is well managed and as smooth as possible.

- 4.30 There will, of course, be flexibility in the approach to pupil pathways to enable pupils to attend other schools, where appropriate. For example, where an Annual Review identifies that there has been a significant change in a child's needs, it might be appropriate for the child to transfer to a special school. The Council will, of course, continue to carefully consider the views and wishes of parents and children and young people in relation school placements. The Council will coordinate and commission all SEND placements in Derby for all schools, other Local Authorities and Independent providers. This will help ensure a consistent and coordinated approach and that pupils are placed in the most appropriate setting based on level of need.
- 4.31 The proposal is to implement the proposed placement criteria as set out in Appendix 3 and the proposed pupil pathways as set out in Appendix 4. The placement criteria will be kept under review for all enhanced resource schools and special schools.

### **c. Special Schools**

- 4.32 There was support and agreement with the overall principles outlined in the consultation document – “Derby Schools for Derby children and supporting inclusion”. There was also agreement with the principle that the current landscape in Derby for children who need to attend a Special School needs better aligning. The Special School Headteachers attended eight engagement meetings to help shape the initial proposals and indicated, through the consultation, that it is important for the Council and Schools to continue to work in close partnership in improving city-wide specialist provision.
- 4.33 St Giles School coordinated consultation responses from pupils, parents, carers, the Governing Body, staff, Senior Leadership Team and wider community. The responses are summarised in detail in Appendix 2.

#### How the Council has responded

- 4.34 The consultation document acknowledged the need for further consideration to be given to special school pupil pathways and consultation responses supported this. As a result, the Council has continued to develop initial proposals for creating special school pupil pathways, with aligned pupil placement criteria.
- 4.35 With exception of Ivy House School, which is an all-through school, and Kingsmead School, which offers distinct provision for pupils with behavioral needs, currently Derby only has one primary special school (St Giles School) and three secondary special schools (St Andrew's School, St Clare's School and St Martin's School). This imbalance creates difficulties in terms of sufficient primary special places, and also can be problematic at secondary transfer.

- 4.36 Following further scoping work and initial discussions with special school headteachers, this report seeks approval to progress scoping proposals to change the age range of St Clare's School from a secondary school to a primary school, to create two primary schools and two secondary schools. The outcome of this scoping will be reported to Cabinet in due course for consideration and approval. The proposal would then be to establish pupil pathways as follows:

<b>Primary School</b>	<b>Secondary Transfer School</b>
St Giles School	St Andrews School
St Clares School	St Martins School

- 4.37 The aim of the proposals is to provide clear and transparent pathways for pupils and parents and to support transition planning from primary to secondary education. Currently there are pressures on primary special school places and the conversion of St Clare's School to primary provision would better align capacity to demand for places. In terms of reduced secondary special school capacity, this would be addressed through increased mainstream inclusion and the additional Enhanced Resource School provision proposed at Bemrose School.
- 4.38 It is also likely that the special school pupil pathways proposals will bring about benefits for pupils in knowing, at an earlier stage, which school they are likely to transfer to. It would be possible for cohorts of pupils to transfer from primary to secondary education together providing a degree of stability, as the transfer to secondary school is made amongst friends and peers. The views of young people and parents would, of course, continue to be taken into account as part of the placement process.
- 4.39 To support the proposed special school pupil pathways, a single set of draft placement criteria has now been developed for St Andrew's School, St Clare's School, St Giles School and St Martins School, as set out in Appendix 3. This would also help ensure these four special schools work even closer together in supporting pupils with complex needs and will really help to support children, parents and carer at secondary transfer.
- 4.40 In addition, the updated single set of placement criteria aims to ensure a range of specialist provision offered at each special school with the flexibility to meet the individual needs of as many of Derby's children and young people as possible, in local school settings. This report recommends approval of those placement criteria for the September 2019 intake, as work continues on developing the pupil pathways. A further report will be presented to Council Cabinet for consideration following the scoping of special school pupil pathways in relation to St Clare's Special School.

- 4.41 As a result of the SEND fund banding changes that were implemented from April 2018, all four special schools now receive a consistent level of per pupil funding and the proposal now is for each of the schools to provide a range of flexible specialist provision. The Council has, overall, committed significant additional funding of £911,000 for our special schools and enhanced resource schools over a three year period linked to the banding changes. The additional funding has been committed to help support the implementation of the proposals to improve Derby's specialist provision.

**d. Alvaston Junior School and Lees Brook School: Social, Emotional and Mental Health (SEMH) Provision**

- 4.42 Through the consultation, concerns were raised regarding the proposals to established provision for pupils with SEMH needs at Alvaston Junior School and Lees Brook School. These concerns primarily related to not being able to meet the needs of children with SEMH and additional specialist accommodation being needed.

How the Council has responded

- 4.43 The Council will consider alternative options for providing places for pupils with Social, Emotional and Mental Health (SEMH) needs, including proposals to carefully de-commission the current 12 places at Alvaston Junior School and the 16 places for 11-16 year olds at Lees Brook School.
- 4.44 Subject to approval, the Council will not make any further placements in the Enhanced Resource School provision at Alvaston Junior School and Lees Brook School from September 2019 but will continue to fund places for pupils currently on roll in the provision as they move through the schools. Discussions will take place with the schools in due course as part of transition planning and de-commissioning arrangements. The funding released across the two schools, based on current numbers, will be £127,000 at Alvaston Junior School and £134,500 at Lees Brook School (total of £261,500). The released funding will be ring-fenced and prioritised for children with SEMH needs. A further report will be presented to Cabinet for consideration following initial scoping of alternative options to create the required SEMH provision for our children and young people in Derby, and use of this £261,500 funding.

**e. Brackensdale ER Primary School: 'Mainstream' Enhanced Resource (ER) School Places**

- 4.45 Concerns were raised in relation to the loss of mainstream ER school places as some of the pupils might not be able to cope in mainstream schools. It was felt that the proposals would cause funding issues at Brackensdale ER Primary School and the school may not be able to continue to provide the high quality provision that is currently available.

How the Council has responded

- 4.46 The Children and Families Act 2014 secures the general presumption in law of mainstream education in relation to decisions about where children and young people with Special Educational Needs (SEN) should be educated.
- 4.47 With regard to existing Enhanced Resource School (ERS) provision at Brackensdale ER Primary School, some pupils currently attend mainstream classes for the majority of their education. For these pupils, it is considered possible that a local mainstream school could meet their needs (subject to an individual needs assessment), with funding and support made available. This means that the child or young person could access a local school, with reduced school travel time. There are no proposals to reduce overall funding and the aim of the proposals is to help ensure that pupils are able to access the most appropriate type of provision for their individual needs.
- 4.48 The Council has commissioned a total of 57 Enhanced Resource School (ERS) places at Brackensdale ER Primary School in 2018-19, which are made up of 'mainstream' ERS places and Ark and Phoenix places. The proposal is to decommission the mainstream ERS places, and to align the Ark and Phoenix provision to 28 places, which equates to 4 pupils per year group for future placements. It is important to note that no existing pupil placements or funding for these pupils will be affected. The proposals will apply to future placements made from September 2019.
- 4.49 The proposals, if approved, will start to be implemented from September 2019. It is recognised that the change in pupil numbers will need to take place on a gradual basis and Council will work very closely with the school on transition planning for the proposed change to 28 ERS commissioned places (Ark and Phoenix places). As part of these transition planning arrangements, there will be financial protection in place for Brackensdale ER Primary School up until March 2021.
- 4.50 With regard to the placements currently made in the mainstream ERS provision, the proposal is for future similar pupil placements to be made in mainstream schools, subject to an individual needs assessment, with funding and support available. This is to help provide children with a mainstream education and a local school placement, as far as possible and appropriate. The SEND Graduated Response Strategy will provide support and clarity to mainstream schools on inclusion and accommodating pupils with SEND, with funding available.
- 4.51 In terms of wider proposals for Brackensdale ER Primary School, an expansion is proposed to accommodate pupils from the housing development currently underway at Manor Kingsway, within the school's catchment area. Around 700 properties are proposed over the phases of the development. The proposal is to expand Brackensdale ER Primary from an admission number of 60 to 75, with an overall capacity increase of 105 places (420 places to 525 places). The expansion scheme will be delivered using Section 106 capital funding of around £1.9 million.



- 4.52 Given the proposed school expansion, it is not considered possible to increase Ark and Phoenix ERS provision at the school above the 28 places proposed. Pupils on roll in the Ark and Phoenix provision require specialist teaching accommodation and the school site is unlikely to sustain further expansion beyond the expansion that is already proposed. The current ERS provision at Brackensdale ER Primary School is very large in comparison to other primary ERS provisions in the city. The number of proposed ERS places is considered a more appropriate level of provision for a primary school.
- 4.53 The proposal is for the new placement criteria and number of ER school places to be implemented from September 2019, but for additional funding to remain in place as part of the transition process until March 2021. This will help support the school by allowing a transitional period to plan for the change in ER pupil places and funding. The Council will also closely support the school in planning for this change. The school will continue to have 28 specific SEND ER school places within the Ark and Phoenix provision.

**f. Central Community Nursery School and Lord Street Nursery School: Early Years Specialist Provision**

- 4.54 Consultation comments included:
- There will be no specialist provision for children with SEND aged 2-4 years and children might not be able to manage in mainstream nurseries.
  - Staff in the Enhanced Resource (ER) School nurseries have been trained and qualified over many years.
  - ER school provision in early years is essential to the education, inclusion and development of young children.
  - Funding should be fair and equal for all providers irrelevant of their status or whether they are in the maintained or private and voluntary sector.
  - Funding places close to home is important as some of our SEND children would not be able to access nurseries in other parts of the city.

How the Council has responded

- 4.55 The table below shows the number of children with SEND on roll at standalone maintained nursery schools, based on January 2018 School Census data.

<b>Council Maintained Nursery Schools</b>	<b>Number of children accessing SEND support</b>	<b>Number of children with an EHC Plan / Statement of SEN</b>	<b>Total number of children with SEND</b>
Ashgate Nursery	7	0	7
Central Community Nursery	20	1	21
Harrington Nursery	9	1	10
Lord Street Community Nursery	16	1	17
Stonehill Nursery	5	1	6
Walbrook Nursery	23	0	23
Whitecross Nursery School	7	0	7
<b>Total</b>	<b>87</b>	<b>4</b>	<b>91</b>

- 4.56 In Derby, 40 primary schools offer nursery provision in their nursery units. According to School Census data, there are currently 133 children with SEND on roll across those 40 nursery units, with 131 of these children requiring SEND support and 2 with EHC Plans. In addition, many private, voluntary and independent nurseries are also supporting children and young people with SEND.
- 4.57 Enhanced Resource (ER) School funding is currently provided to Lord Street Nursery (£110,000) and Central Community Nursery (£142,055). The proposal is to reallocate the funding provided to Central Community Nursery School and Lord Street Nursery School, totalling £252,055, to a single Early Years Inclusion Fund which Maintained Mainstream Settings and Private, Voluntary and Independent (PVI) settings can make applications to in order to provide additional support for children with SEND, including proposals to decommission the Enhanced Resource School places at Central Community Nursery School and Lord Street Nursery School. A transition plan will be developed to de-commission this provision from September 2020.
- 4.58 The aim is to help ensure that parents of pupils with SEND have a wide choice of childcare and early years options and are able to access local places. The proposal will create a more transparent and consistent approach to providing funding to meet the needs of children in early years settings.

**g. Bemrose School (Primary Phase): Enhanced Resource (ER) School Provision for Pupils with Communication and Interaction Needs.**

- 4.59 The consultation included a proposal to establish 14 ER school places at Meadow Farm Primary School for pupils with communication and interaction needs. Governors and the Headteacher of Meadow Farm Primary School raised concerns in relation to the proposal.

How the Council has responded

- 4.60 The comments from Meadow Farm Primary School are noted and the Council has considered other options for locating the provision.

- 4.61 The Bemrose School governing body has given agreement, in principle, to working with the Council on assessing the possibility of establishing the primary provision at the school for 14 places. The Bemrose School secondary phase already offers Enhanced Resource School provision for pupils with communication and interaction needs.
- 4.62 The proposal is to carry out a feasibility study, working in close partnership with The Bemrose School, to establish how accommodation can be increased for primary school pupils with communication and interaction needs.

#### **h. Enhanced Resource (ER) School Places**

- 4.63 In addition to the comments received in relation to the above ERS proposals, a query was raised around whether the proposed number of ER school places would be sufficient to meet with demand.

##### How the Council has responded

- 4.64 The proposed number of commissioned places for each ER school provision is set out in Appendix 5. The number of places offered at each ER school will be subject to review each year to ensure that they reflect demand for places.

#### **SEND Fund Bandings**

- 4.65 With regard to SEND fund bandings, the Council has approved the implementation of a single per pupil SEND fund banding for each Special School and Enhanced Resource School from April 2018. The new bandings have been established to create a more consistent and equitable funding approach across the city special schools, where a child with SEND at one school would attract the same level of funding as a child with similar needs at another school.
- 4.66 The Council has allocated £911,000 of additional funding for SEND provision over a three year period, a significant investment in our city special schools and enhanced resource schools. The changes will result in a significant funding increase for St Clare's School, which is currently funded at a much lower level than the other special schools. There is also an increase in funding for St Martin's School.
- 4.67 In order to support schools, transitional funding arrangements have been put in place, over a two year period, for those schools where budgets are expected to reduce. It is also important to note that exceptional needs funding can be applied for, if a child or young person on roll has very complex needs that cannot be met from within existing budgets.

#### **Proposed Capital Investment in Specialist Provision**

- 4.68 As part of the Council's continued commitment to improving specialist provision, this report also recommends approval to carrying out feasibility studies for improving and increasing provision at The Bemrose School and St Clare's School, with a view to making capital investment of £7.2m across the two schools. Subject to approval, the investment is intended to help support the schools in meeting the individual needs of pupils with SEND, in view of the proposed changes to the placement criteria and number of commissioned places. The proposals will be subject to the final confirmation of indicative capital funding allocations already announced by the Department for Education (DfE).

#### The Bemrose School

- 4.69 Subject to confirmation of indicative funding allocations and detailed feasibility, the proposal is to provide additional specialist accommodation for 14 new Primary ER school places (Reception to Year 6) and 45 existing Secondary ER school places (Years 7-11) in a new dedicated teaching block. This will provide necessary specialist accommodation, whilst also allowing pupils to benefit from accessing facilities available in the main school buildings, where appropriate.
- 4.70 It is proposed to negotiate the delivery of this accommodation through the Department for Education's (DfE's) Priority Schools Building Programme (PSBP) 2, which is currently on site. The Council is already contributing to this scheme in order to provide additional secondary mainstream places. It is, therefore, proposed to negotiate further development of the PSBP 2 scheme to encompass the necessary additional specialist accommodation, subject to agreement. The PSBP 2 scheme is due on site at The Bemrose School until Autumn 2021. Subject to detailed design feasibility, it is anticipated that the ERS scheme will cost approximately £3.2m.

#### St Clare's Special School

- 4.71 For St Clare's Special School, the proposal is to reconfigure the existing school site to ensure the appropriate capacity for the needs of pupils as a result of the proposed SEND strategy changes. Subject to detailed feasibility and design works, in consultation with the school, it is proposed to allocate £4m capital funding to undertake the necessary major works to the school, which could include a combination of remodelling and additional accommodation to convert St Clare's School to a primary special school for the school's September 2021 intake.
- 4.72 It is recognised that St Clare's primary conversion will not happen until September 2021 at the earliest, and therefore consideration is currently being given for additional temporary classrooms either at St Clare's School or other school (s) and capital funding, should there be a need for additional primary special places during the interim to ensure sufficient places. This scoping will be included as part of the proposed feasibility studies.

- 4.73 Proposals for both schools will be developed in view of changes proposed to specialist provision and will be subject to confirmation of final capital funding allocations already announced as indicative by the DfE. Funding proposals are set out in Appendix 1 in more detail. The Council currently has an unallocated 2018/19 Basic Need allocation of £2,274,910 available for new school places. The Council is due to receive a further allocation of £12,768,087 in Basic Need funding in 2019/20. The Council also currently has an unallocated 2018/19 Special Provision Capital Fund grant of £275,162, with further allocations of £275,162 to be received in both 2019/20 and 2020/21.
- 4.74 It is proposed to allocate £6.375m of this Basic Need funding and £0.825m in Special Provision Capital funding for The Bemrose School (£3.2m) and St Clare's Special School (£4m) proposals, as set out in Appendix 1. It is important to note that Basic Need funding is allocated to ensure sufficient primary and secondary places. The proposal is to use £6.375m of this basic need capital funding to improve SEND provision.
- 4.75 It is important to note that the capital funding figures of £3.2m for The Bemrose School and £4m for St Clare's School are indicative budget figures only, and detailed feasibility studies are proposed. Specific costings will be reported to a future meeting of Council Cabinet.
- 4.76 There is a risk in that whilst current projections indicate that the remaining balance of basic need capital funding should be sufficient to manage any need for additional primary or secondary places, if that position changes, then funding would not be available to take forward the proposed capital projects at St Clare's and The Bemrose School. This is a managed risk, but it is important to recognise that this is a risk to the Council.

### **Commissioning and Co-ordination of Specialist Provision Placements**

- 4.77 In future, Derby City Council will be responsible for co-ordinating all SEND placements in Derby to ensure that pupils are placed in the most appropriate setting based on level of need. Individual schools and other Councils will be unable to offer placements in Derby's specialist provision due to the Council's coordinated approach to specialist provision placements.
- 4.78 It is absolutely essential that all schools in Derby form part of the strategy to improve specialist provision. Given the importance of delivering the SEND Vision for Derby and, subject to approval, outcomes of the specialist provision review, it is considered essential that SEND requirements are prioritised by all schools. Subject to approval of the specialist provision proposals, Service Level Agreements (SLAs) will be reviewed to reflect the SEND changes for Special Schools and Enhanced Resource Schools.

- 4.79 In the unlikely event that an enhanced resource school or special school should refuse to take a pupil whose needs can be effectively met there, the Council may direct the school to admit the pupil in accordance with the Council's placement criteria, and the Council's overarching responsibilities for SEND. This is part of the Council's role in championing the needs of children and young people with SEND and ensuring that they are placed in provision that can best meet with their specific and individual needs.
- 4.80 With regard to schools converting to academy status, the Council is working closely with the Department for Education (DfE) on the Council's strategic specialist provision proposals. Any changes to specialist provision at Academy schools will be made in accordance with clauses set out in Academy Funding Agreements relating to the Council's strategic role in commissioning SEND provision. Initial discussions are underway with the DfE to establish whether it could be possible for SLAs to be appended to Academy Funding Agreements for future conversions.

### **Draft SEND Implementation Timeline**

- 4.81 It is fully recognised that it is very important for the Council to carefully manage the transitional changes in improving Derby's citywide SEND provision. The draft timetable below sets out proposed actions and timescales.

<b>Action</b>	<b>Timescale</b>
Additional overall funding of £911,000 for Derby's Special Schools and Enhanced Resource Schools through the new SEND fund bandings.	April 2018
Proposals developed for Social, Emotional and Mental Health provision and proposals to de-commission current Enhanced Resource School provision at Alvaston Junior School and the 11-16 provision at Lees Brook School. Subject to approval, the Council will not make any further placements in the Enhanced Resource School provision at Alvaston Junior School and Lees Brook School from September 2019 but will continue to fund places for pupils currently on roll in the provision as they move through the schools.	March 2019
New placement criteria and ERS pathways implemented with the exception of the changes for Bemrose School, which require accommodation changes.	September 2019
To reallocate the funding provided to Central Community Nursery School and Lord Street Nursery School to a single Early Years Inclusion Fund, including proposals to start planning the careful decommissioning of the Enhanced Resource School places at Central Community Nursery School and Lord Street Nursery School.	September 2020
Brackensdale ER Primary School – transitional funding arrangements put in place.	Up until end of March 2021
Bemrose School primary ERS new accommodation for pupils with communication and interaction needs to open.	September 2021
St Clare's School new / remodelled accommodation to open for September 2021 intake.	September 2021

## OTHER OPTIONS CONSIDERED

- 5.1 The consultation exercise has been extremely helpful. The Council has considered, very carefully, all responses and has made changes to the proposals in light of the comments and suggestions that have been raised. In view of the consultation responses received and the requirements of the national SEND reforms, the recommendation is to approve the updated proposals, as set out in the report.

This report has been approved by the following officers:

<b>Legal officer</b> <b>Financial officer</b> <b>Human Resources officer</b> <b>Estates/Property officer</b> <b>Service Director(s)</b> <b>Other(s)</b>	Emily Feenan, Principal Lawyer Alison Parkin, Head of Finance – People Services Liz Moore, Head of HR None Andy Smith, Strategic Director for People Services Suanne Lim, Service Director - Children's Integrated Services Pauline Anderson, Service Director - Learning and Skills Paula Nightingale, Head of Inclusion Nicola Goodacre, Group Accountant (Capital) Ann Webster, Equality and Diversity Lead Ruth Sadler, Senior Communications Officer
<b>For more information contact:</b> <b>Background papers:</b> <b>List of appendices:</b>	Gurmail Nizzer, Director of Commissioning (Acting) 01332 642720 gurmail.nizzer@derby.gov.uk None Appendix 1 – Implications Appendix 2 – Summary of Consultation Responses Appendix 3 – Proposed Placement Criteria Appendix 4 – Proposed Pupil Pathways Appendix 5 – Proposed Enhanced Resource School Places Appendix 6 – SEND Joint Strategic Needs Assessment – July 2016 Appendix 7 –Capital Funding Proposals: Bemrose School & St Clare's School Appendix 8 - Equalities Impact Assessment

## IMPLICATIONS

### Financial and Value for Money

#### Capital Funding

- 1.1 It is proposed to commit unallocated Basic Need and Special Provision Capital funding for The Bemrose School and St Clare's Special School proposals, and indicative 19/20 allocations, as follows:

<b>Total Available Funding:</b>		
Total DfE Special Provision Capital Fund available 2018/19 to 2020/21		£825,486
Total unallocated 2018/19 and 2019/20 Basic Need funding available		£15,042,997
<b>Total Funding available</b>		<b>£15,868,483</b>
<b>Proposed Allocations:</b>		
<b>Proposed Scheme:</b>	<b>Funding allocations:</b>	
<b>The Bemrose School - Enhanced Resources Unit</b>	Special Provision Capital Fund	£412,743
	Basic Need funding	£2,787,257
	<b>Bemrose Total</b>	<b>£3,200,000</b>
<b>St Clare's Special School</b>	Basic Need funding	£3,587,257
	Special Provision Capital Fund	£412,743
	<b>St Clare's Total</b>	<b>£4,000,000</b>
<b>Total Proposed Commitment</b>		<b>£7,200,000</b>
<b>Summary Allocations and Remaining Funding by Funding Stream</b>		
<b>Special Provision Capital Fund</b>	Total allocated	£825,486
	Remaining balance	£0
<b>Basic Need</b>	Total allocated	£6,374,514
	Remaining balance of unallocated Basic Need funding to be prioritised for schemes undergoing careful consideration	£8,668,483

Further information on the phasing of allocations and commitments over each financial year for 2018/19 to 2020/21 are set out in more detail in Appendix 7.

- 1.2 The proposed allocations will be subject to detailed feasibility works and confirmation of final funding allocations by the Department for Education. These will be reported back to Cabinet for consideration.
- 1.3 Proposals for both schools will be developed in view of changes proposed to specialist provision and will be subject to confirmation of final capital funding allocations already announced as indicative by the DfE. The Council currently has an unallocated 2018/19 Basic Need allocation of £2,274,910 available for new school places. The Council is also currently due to receive a further allocation of £12,768,087 in Basic Need funding in 2019/20. The Council also currently has an unallocated 2018/19 Special Provision Capital Fund grant of £275,162, with further allocations of £275,162 to be received in both 2019/20 and 2020/21



- 1.4 It is proposed to allocate £6.375m of this Basic Need funding and £0.825m in Special Provision Capital funding for The Bemrose School (£3.2m) and St Clare's Special School (£4m) proposals. It is important to note that Basis Need funding is allocated to ensure to sufficient primary and secondary places. The proposal is to use £6.375m of this this basic need capital funding to improve SEND provision. There is a risk in that whilst current projections indicate that the remaining balance of basic need funding should be sufficient to manage any need for additional primary or secondary places, but if that position changes, then funding would not be available to take forward the proposed capital projects at St Clare's and The Bemrose School. This is a managed risk, but it is important to recognise that this is a risk to the Council.
- 1.5 It is important to note that the capital funding figures of £3.2m for The Bemrose School and £4m for St Clare's School are indicative budget figures only, and detailed feasibilities studies are proposed. Specific costings with be reported to a future meeting of Council Cabinet.

### Revenue Funding

- 1.6 The table below sets out a summary of SEND funding budgets for 2018/19, by type of setting.

	<b>2018/19 Budget</b>
<b>Independent and not maintained by Derby special schools</b>	£8,100,000
<b>Special Schools</b>	£14,239,579
<b>Enhanced Resource (Element 2 and 3)</b>	£3,158,257
<b>Top up in mainstream schools</b>	£2,800,000
<b>Pupil Referral Units and hospital and medical tuition</b>	£2,693,887
<b>Total</b>	<b>£30,991,723</b>

- 1.7 In addition, around **£23 million** per year is allocated to mainstream schools, as part of their delegated budgets, as notional SEND funding. All mainstream school Governing Bodies are asked to ensure that SEND Notional Funding is carefully prioritised for pupils with SEND. Schools are also able to apply for funding through Locality Panels to provide additional resources and support for children and young people with SEND.
- 1.8 In total, **over £50 million** of funding allocated by Derby City Council to ensure that schools are able to meet the individual needs of children and young people with SEND. This is funded from the Dedicated Schools Grant which is a ring fenced grant provided to The Council to fund its schools, other education provision and related services for Derby's children and young people.

- 1.9 With regard to SEND fund bandings, the Council has approved the implementation of a single per pupil SEND fund banding for each Special School and Enhanced Resource School from April 2018. The Council has allocated £911,000 of additional funding for SEND provision over a three year period, a significant investment in our City schools. In order to support schools, transitional funding arrangements have been put in place, over a two year period, for those schools where budgets are expected to reduce. It is also important to note that exceptional needs funding can be applied for by special schools if a child or young person on roll has very complex needs that cannot be met from within existing budgets. The additional funding has been committed to help support the implementation of the proposals to improve Derby's specialist provision.

## **Legal**

- 2.1 Part 3 of the Children and Families Act 2014 places legal duties on Local Authorities to identify and assess the special educational needs of children and young people for whom they are responsible. LAs become responsible for a child/young person in their area when they become aware that the child/young person has or may have SEN. They must then ensure that those children and young people receive a level of support which will help them “achieve the best possible educational and other outcomes”.

## **Personnel**

- 3.1 None arising from this report.

## **IT**

- 4.1 None arising from this report.

## **Equalities Impact**

- 5.1 An Equalities Impact Assessment (EIA) has been completed with the support of the Equality and Diversity Team, and the Special Educational Needs and Disabilities Information Advice and Support Service (SENDIASS). The Equalities Impact Assessment Team included parent representatives and officers specialising in Educational Psychology, Health and Safety, Specialist Teaching Services and SEND provision.
- 5.2 An EIA Team meeting on the proposals to improve specialist provision took place on 16 November 2017. An agenda and summary paper were circulated in advance of the meeting. At the meeting, the proposals were discussed and consideration was given to the impact of each of the proposals on the different equalities groups. The views of the Voices in Action Youth Council were included and carefully considered as part of the Equalities Impact Assessment. The EIA is attached to this report as Appendix 8.

- 5.3 In terms of consultation responses, equalities data was captured in relation to the online responses. An analysis found no significant difference between responses according to age, gender, ethnicity or any other equality group.

### **Health and Safety**

- 6.1 None arising from this report.

### **Environmental Sustainability**

- 7.1 None arising from this report.

### **Property and Asset Management**

- 8.1 None arising from this report.

### **Risk Management**

- 9.1 The Council continues to work in close partnership with all city schools and it is absolutely essential that all schools form part of the strategy to improve specialist provision. It is recognised that there could potentially be a risk to the implementation of the strategy in relation to schools converting to academies. The Council is working closely with the DfE to manage this risk in line with specific clauses in Funding Agreements relating to the Council's strategic role in commissioning SEND provision.

### **Corporate objectives and priorities for change**

- 10.1 This report supports the Council priority outcome of 'Enabling individuals and communities, and Raising achievement and skills'.

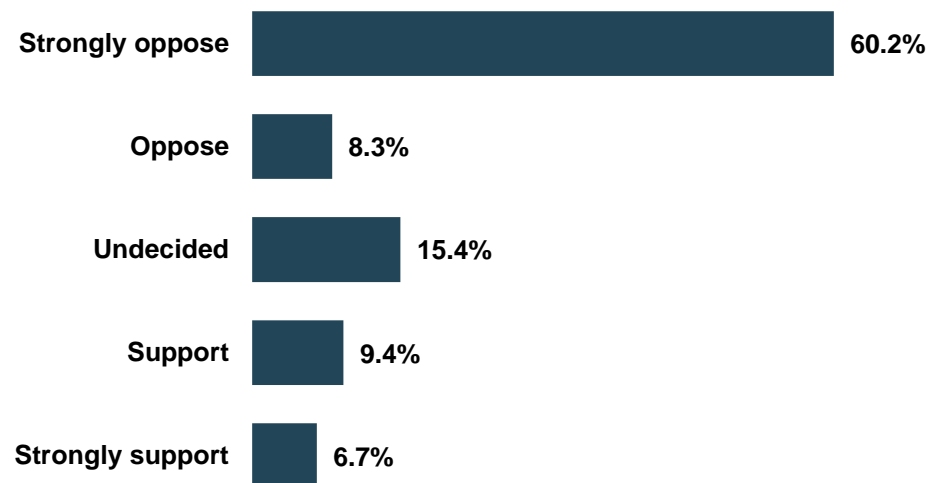
## Summary of Consultation Responses

### Main findings

Respondents were asked questions on the proposals and were given an opportunity to make any comments. The responses to each question are summarised below. There are two charts summarising responses for each question, one of which relates to responses submitted online, through Your City Your Say, and the other the paper based feedback forms.

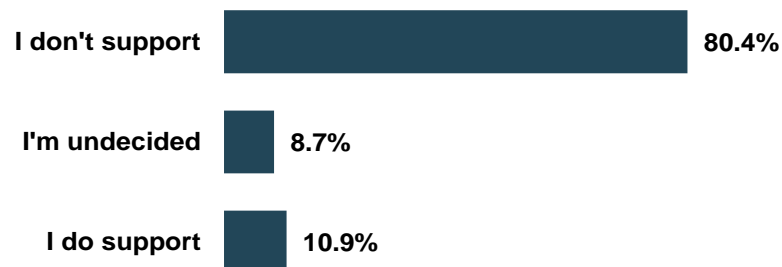
### Proposal for new placement criteria for enhanced resource schools and special schools

**Chart 1: To what extent do you support the proposed new placement criteria for enhanced resource schools and special schools (Online consultation responses)**



Base: 254 respondents

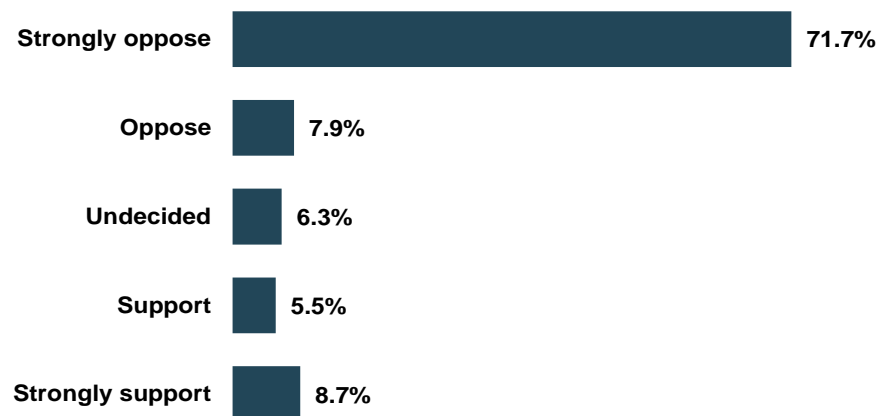
**Chart 2: To what extent do you support the proposed new placement criteria for enhanced resource schools and special schools (Paper based feedback forms)**



Base: 46 consultees

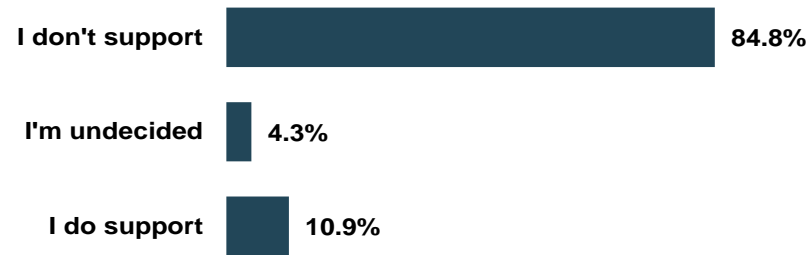
**Proposals to make changes to enhanced resource school places, as set out in the consultation document.**

**Chart 3: To what extent do you support the Council's proposals to make changes to enhanced resource places, as set out in the consultation document? (Online consultation responses)**



Base: 254 respondents

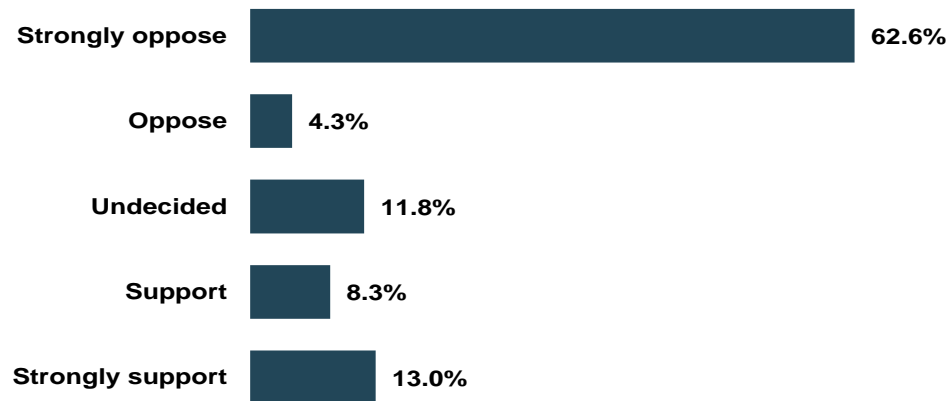
**Chart 4: To what extent do you support the Council's proposals to make changes to enhanced resource places, as set out in the consultation document? (Paper based feedback forms)**



Base: 46 consultees

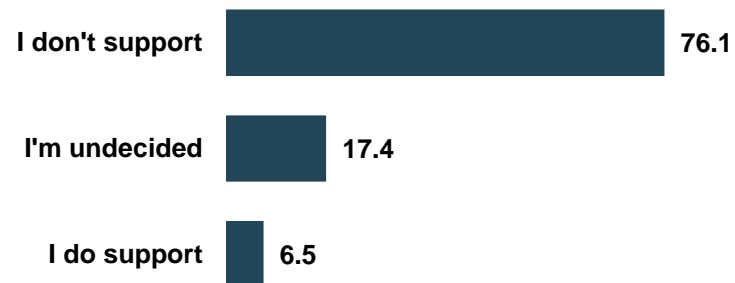
### **Proposals to establish a single Early Years Inclusion Fund**

**Chart 5: To what extent do you support the Council's proposals to establish a single Early Years Inclusion Fund, as set out in the consultation document? (Online consultation responses)**



Base: 254 respondents

**Chart 6: To what extent do you support the Council's proposals to establish a single Early Years Inclusion Fund, as set out in the consultation document? (Paper based feedback forms)**



Base: 46 consultees

## Consultation Comments

The consultation responses are summarised by theme as follows in the tables below.

- i. General Comments
- j. Inclusion
- k. Enhanced Resource Schools
- l. Early Years Specialist Provision
- m. Response from Parent Carers Together & Summary of Parent Views Collected
- n. Response from Special Schools
- o. Response from the National Deaf Children's Society
- p. Response from Voices in Action Youth Council

### a. General Comments

Comment	Derby City Council Response
<b>General Comments</b>  <b>The following points were welcomed by some of the respondents:</b> <ul style="list-style-type: none"><li>• Derby City Council now has an overall strategic vision.</li><li>• Reorganisation of local provision</li><li>• Increased provision - 2 categories</li><li>• Agree with the basis of this document – Derby Schools for Derby children and the inclusion of all children in</li></ul>	<b>General Comments</b>  These are useful points, which are noted.



<p>Mainstream Schools where appropriate.</p> <ul style="list-style-type: none"> <li>• Agree, in principle, that the current landscape within Derby for children who need to attend a special school does not make sense and needs better aligning.</li> </ul> <p><b>The following points were noted by some of the respondents:</b></p> <ul style="list-style-type: none"> <li>• No cuts to overall budget</li> <li>• Difficulties of balancing need to commission services for majority of SEND pupils vs requirement to meet need in every case and tensions that arise between two.</li> </ul>	
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## b. Inclusion

Comment	Derby City Council Response
<ul style="list-style-type: none"> <li>• Response on behalf of Derby NASUWT Local Association: Members have expressed concern about the money, resources and training that would be available to support teachers in mainstream schools who would see an increase in their workload to integrate more SEND children into their classes. The document states that there are no proposals to reduce funding but as a considerable amount of funding is currently spent on</li> </ul>	<p>Under the SEND Code of Practice, every school is required to identify and address the SEN of the pupils that they support. The quality of teaching for pupils with SEN, and the progress made by pupils, should be a core part of the school's performance management arrangements and its approach to professional development for all teaching and support staff.</p> <p>A draft SEND Graduated Response Strategy has been developed for consideration by Council Cabinet. The draft SEND</p>

<p>provision outside of the City, can we guarantee all of this funding would become available to Derby schools?</p> <ul style="list-style-type: none"> <li>• Many children with SEND may not integrate appropriately in a mainstream school.</li> <li>• I think this is a good thing.</li> <li>• If mainstream schools cannot meet the needs of pupils, it could result in pupils displaying mental health or behavioural difficulties that wouldn't be the case if needs were met adequately in the first place.</li> <li>• Each individual mainstream school has a choice of what SEND support packages they purchase from the Council. Some schools will opt to buy more SEND support than others depending on what they see to be priority.</li> <li>• Schools are under immense pressure to raise standards and levels of attainment and they are being asked to manage an increasing number of pupils with complex and challenging problems.</li> <li>• What provision has been made to ensure all mainstream schools in the city are ready to take children and young people with SEND as part of their 2018 intake, in terms of staff training, extra facilities etc</li> <li>• Support was expressed for a central Specialist Teaching Support Service to support mainstream inclusion.</li> </ul>	<p>Graduated Response Strategy sets out the steps to be taken by the Council and schools to support children and young people with SEND. It provides support to all schools and clarity around the process and criteria for determining the level of provision needed to effectively support an individual pupil's progress. The strategy incorporates the 'assess', 'plan', 'do' and 'review' cycle as outlined in the SEND Code of Practice 0-25.</p> <p>All mainstream schools receive notional SEND funding. In Derby, around £23 million per year is allocated to mainstream schools, as part of their delegated budgets, as notional SEND funding.</p> <p>Schools are not expected to meet the full costs of more expensive special educational provision from their core funding and are able to make an application to their Locality Funding Panel, once they have allocated their notional SEND funding.</p> <p>Additional funding for children with highly complex needs is provided to schools and settings through the Education, Health and Care Assessment process.</p> <p>Where mainstream schools are unable to effectively support children and young people with SEND, enhanced resource schools or special schools may provide the most appropriate setting for meeting the needs of individual pupils.</p>
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### c. Enhanced Resource Schools

Comment	Derby City Council Response
<p><b>Brackensdale School: Withdrawal of 'mainstream' primary and secondary ERS places</b></p> <ul style="list-style-type: none"> <li>Disagree with the loss of mainstream ERS places as pupils might struggle in mainstream schools and it will reduce funding for these schools.</li> <li>The mainstream ERS places allow children to access mainstream classes when they are able to cope. The children might need isolated spaces, smaller classes, sensory rooms.</li> <li>The level of skill and experience in Brackensdale School are vital for supporting the holistic needs of children with autism. If the proposals go ahead, children will lose this support at a crucial time in their lives.</li> <li>ER schools with mainstream places are beneficial to other children as children develop an understanding and acceptance of SEND.</li> <li>Placements are more likely to fail due to mainstream schools not meeting needs.</li> <li>There is a risk to the dedicated experienced teams that</li> </ul>	<p><b>Brackensdale School: Withdrawal of mainstream primary and secondary ERS places</b></p> <p>The Children and Families Act 2014 secures the general presumption in law of mainstream education in relation to decisions about where children and young people with Special Educational Needs (SEN) should be educated.</p> <p>As set out in the Special Educational Needs &amp; Disability (SEND) Code of Practice 0-25 years, all children and young people are entitled to an appropriate education, one that is appropriate to their needs, promotes high standards and the fulfilment of potential. The proposals aim to ensure that pupils are able to access mainstream school places, with support, as far as possible.</p> <p>Some pupils in Enhanced Resource Schools currently attend mainstream classes for the majority of their education. For these pupils, it is possible that a local mainstream school could meet their needs (subject to an individual needs assessment), with funding and support made available. This means that the child or young person could access a local school, with reduced school travel time. There are no proposals to reduce overall funding and the aim of the proposals is to help ensure that pupils are able to access the most appropriate type of provision for their individual needs.</p>

are in place there.	
<p><b>Meadow Farm Primary School: Proposal to establish Enhanced Resource School Provision for Pupils with Communication and Interaction Needs</b></p> <ul style="list-style-type: none"> <li>• Support, in principle, is given to the proposals to improve specialist provision for children and young people in Derby.</li> <li>• The requirement to increase mainstream inclusion is acknowledged.</li> <li>• The Governing Body of Meadow Farm Primary School does not agree with the proposals to create 14 ERS places at Meadow Farm Primary School for pupils with communication and interaction needs.</li> </ul>	<p><b>Meadow Farm Primary School: Proposal to establish Enhanced Resource School Provision for Pupils with Communication and Interaction Needs</b></p> <p>The comments from Meadow Farm Primary School are noted and the Council has scoped other options for locating the provision.</p> <p>The Bemrose School has given agreement, in principle, to working with the Council on assessing the possibility of establishing the primary provision at the school. The proposal is to carry out a feasibility study, working in close partnership with the school, to establish how accommodation can be increased for primary school pupils with communication and interaction needs.</p>
<p><b>Alvaston Junior School &amp; Lees Brook School: Proposal to change designation of Enhanced Resource School provision from provision for pupils with Learning Difficulties to provision for pupils with Social, Emotional and Mental Health Needs (SEMH).</b></p> <ul style="list-style-type: none"> <li>• Concerns regarding education, well-being and safety of children and the transitional period, where the schools would be accommodating pupils with different types of needs.</li> </ul>	<p><b>Alvaston Junior School &amp; Lees Brook School: Proposal to change designation of Enhanced Resource School provision from provision for pupils with Learning Difficulties to provision for pupils with Social, Emotional and Mental Health Needs (SEMH).</b></p> <p>The Council will consider alternative options for providing places for pupils with Social, Emotional and Mental Health (SEMH) needs including proposals to carefully de-commission the current provision at Alvaston Junior School and the 11-16 provision at Lees Brook School.</p>

<ul style="list-style-type: none"> <li>• No expertise amongst staff to support and teach pupils with social, emotional and mental health needs.</li> <li>• School accommodation has not been designed to meet the needs of pupils with social, emotional and mental health needs.</li> </ul>	<p>Subject to approval, the Council will not make any further placements in the Enhanced Resource School provision at Alvaston Junior School and Lees Brook School from September 2019 but will continue to fund places for pupils currently on roll in the provision as they move through the schools. The funding released across the two schools will be ring-fenced and prioritised for children with SEMH needs.</p>
<p><b>Pupil Pathways</b></p> <ul style="list-style-type: none"> <li>• The pathways need to be driven by the Education, Health and Care (EHC) plan process.</li> <li>• The pathways cannot be rigid as individual needs are what should drive this.</li> <li>• This suggested 'pathway' should not be used to limit and preclude Parental/Carer choice. The 'pathways' laid out will not be appropriate for all children.</li> <li>• How will the social emotional and mental health needs of students on the communication and interaction pathway be met?</li> <li>• Pupil pathways should be considered for all special schools.</li> </ul>	<p><b>Pupil Pathways</b></p> <p>With regard to pupil pathways, the aim is to provide an early indication to parents of where their child is likely to access secondary provision. It will also enable more formal links to be created between primary and secondary provision.</p> <p>There will, of course, be flexibility in the approach to pupil pathways to enable pupils to attend other schools, where appropriate.</p> <p>In terms of pupils who may have a range of needs, for example Social Emotional and Mental Health and Communication and Interaction needs, their placements will be carefully considered in relation to their individual needs and the detailed assessments that are carried out as part of preparing their Education, Health and Care plans.</p> <p>The suggestion around looking more closely at pupil pathways for special schools is noted and will be considered.</p>

#### d. Early Years Specialist Provision

Comment	Derby City Council Response
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<p><b>Early Years Specialist Provision</b></p> <ul style="list-style-type: none"> <li>• A number of respondents did a cut and paste of the following wording as their response: Considerable thought and detail has been included for primary and secondary phases, including Main Stream, Enhanced Resource Places and Special Schools, and proposed pathways. However, little thought appears to have been made for Early Years. There is already excellent provision in place at Central Community Nursery and Lord Street Community Nursery which supports children with identified needs when they start nursery, as well as providing excellent experience and expertise in identifying and supporting children and their families where SEND identification is new.</li> <li>• The experience and knowledge these staff members have, coupled with the physical facilities built up over the years means that these children can be supported on a 1-to-1, 1-to-2 and 1-to-3 ratio in that one place. This will ultimately cost more as 1to1 for every child would be necessary.</li> <li>• Good idea for the PVI sector to be able to apply and access funding to support children with SEND in their settings. It has always been a challenge in the PVI sector to access funding and this can impact on the level of support that can be offered to a child and affect the child's transition to their next level of education.</li> </ul>	<p><b>Early Years Specialist Provision</b></p> <p>The proposal is to reallocate the funding provided to Central Community Nursery School (£142,055) &amp; Lord Street Nursery School (£110,000 ), totalling £252,055, to a single Early Years Inclusion Fund which Maintained Mainstream Settings and Private, Voluntary and Independent (PVI) settings can make applications to in order to provide additional support for children with SEND, including proposals to decommission the Enhanced Resource School places at Central Community Nursery School and Lord Street Nursery School.</p> <p>The aim is to help ensure that parents of pupils with SEND have a wide choice of childcare and early years options available and are able to access local places. The proposal will create a more transparent and consistent approach to providing funding to meet the needs of children in early years settings.</p>
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<ul style="list-style-type: none"> <li>• By making the funding route more transparent and fair to all early years children, no matter what setting they attend, it will ensure the best possible outcomes and ensure that PVI settings can continue with excellent support and interventions.</li> <li>• As an early years setting, we welcome more funding for children who attend our setting as this enables us to better meet their needs in terms of further training and resources.</li> </ul>	
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**e. Response from Parent Carers Together & Summary of Parent Views Collected**

<b>Comment</b>	<b>Derby City Council Response</b>
<u>Enhanced Resource School &amp; Special School Placement Criteria</u> <ul style="list-style-type: none"> <li>• The criteria should indicate that children could meet with 'some', not all, of the criteria in order to access a place in a particular provision.</li> <li>• Where are occupational therapy and speech and language therapy services in the criteria.</li> <li>• The placement criteria are unclear / prescriptive.</li> <li>• What does 'extreme' mean and how is it measured?</li> <li>• The criteria don't cover mental health needs and anxiety,</li> </ul>	<u>Enhanced Resource School &amp; Special School Placement Criteria</u> <p>The aim of the proposals is to provide clear and transparent placement criteria in order to help support parents, carers, children and young people. The criteria provide a framework for placing pupils in the most appropriate type of provision to meet their individual needs.</p> <p>Decisions on pupil placements will be made having regard to individual needs assessments and reviews as part of developing Education, Health and Care (EHC) plans. Each EHC plan will ultimately inform which level of provision is right for an individual child or young person.</p>

<p>confidence and sensory issues.</p> <ul style="list-style-type: none"> <li>• No input from health and mental health services.</li> <li>• Lack of confidence in the system.</li> </ul>	
<p><u>Proposals to better align Enhanced Resource School Places</u></p> <ul style="list-style-type: none"> <li>• Additional training should be given to settings that do not already provide places.</li> <li>• Specialist settings are needed.</li> <li>• City schools are oversubscribed. How does this impact on mainstream children.</li> <li>• The document doesn't ask about SEND fund bandings and the safeguarding of children in mainstream education.</li> <li>• What evidence have schools provided on staffing, qualifications and implications?</li> <li>• The proposals could impact on mainstream children without needs as they would be disrupted.</li> <li>• The document does not cover mental health issues and children and young people with confidence, anxiety, social and emotional needs.</li> </ul>	<p><u>Proposals to better align Enhanced Resource School Places</u></p> <p>As set out in the Special Educational Needs &amp; Disability (SEND) Code of Practice 0-25 years, all children and young people are entitled to an appropriate education, one that is appropriate to their needs, promotes high standards and the fulfilment of potential. The proposals aim to ensure that pupils are able to access mainstream school places, with support, as far as possible.</p> <p>In terms of pupils who may have a range of needs, for example Social Emotional and Mental Health and Communication and Interaction needs, their placements will be carefully considered in relation to their individual needs and the detailed assessments that are carried out as part of preparing their Education, Health and Care plans.</p> <p>The Council will carefully consider the views and wishes of children and young people in taking any decisions on SEND placements.</p>



<ul style="list-style-type: none"> <li>• The document creates uncertainty around needs and what services can be accessed.</li> <li>• Mainstream schools are not equipped to teach in small classes and don't have staff expertise.</li> <li>• Concern over Ofsted categories of some of the schools and what would happen if academy conversion takes places.</li> </ul>	
<p><u>Proposals to establish a single Early Years' Inclusion Fund</u></p> <ul style="list-style-type: none"> <li>• Don't take the early years Enhanced Resource School (ERS) funding away.</li> <li>• The City should have more resources.</li> <li>• Staff expertise and training will be lost.</li> <li>• Early intervention can prevent future need for specialist placements.</li> <li>• It will affect the child with needs and cause disruption for other children. This could lead to more anxiety.</li> <li>• Who will monitor the use of funding provided and what evidence will be used to evaluate.</li> <li>• There should be an early years ERS pathway.</li> </ul>	<p><u>Proposals to establish a single Early Years' Inclusion Fund</u></p> <p>The proposal is to reallocate the Enhanced Resource School funding provided to Central Community Nursery School (£142,055) &amp; Lord Street Nursery School (£110,000 ), totalling £252,000, to a single Early Years Inclusion Fund which Maintained Mainstream Settings and Private, Voluntary and Independent (PVI) settings can make applications to in order to provide additional support for early years children with SEND. This includes proposals to start carefully planning the de-commissioning of the current provision at Central Community Nursery School and Lord Street Nursery School from September 2020.</p>

#### **f. Responses from Special Schools**

(St Giles School co-ordinated a response from pupils, parents, carers, the governing body, staff, senior leadership team and wider community and the responses collated by the school appear separately in the table below.)

<b>Comments received from Special Schools</b>	<b>Derby City Council Response</b>
<ul style="list-style-type: none"><li>• Agreement in principle that the current landscape within Derby for children who need to attend a special school does not make sense and needs better aligning.</li><li>• Agree with the basis of the consultation document – Derby Schools for Derby children and the inclusion of all children in Mainstream Schools where appropriate.</li><li>• It would have been useful for special school proposals to be fully developed and included in the Consultation.</li><li>• Concern if the expectation is that all students who currently attend St Giles School will go to St Andrew's School as they don't all meet the criteria in the consultation document and time and thought will need to be given to how St Andrew's School will meet the needs of this group of children with a wider range of cognitive needs.</li><li>• Children across the border into Derbyshire should also have access to City Schools – where the school, including special schools, is the child's nearest appropriate provision</li></ul>	<p>To help shape the proposals, eight representative Headteacher engagement meetings were held. The meetings included Headteacher representation from across the City's special schools, enhanced resource schools and mainstream schools at nursery, primary and secondary level.</p> <p>These comments received are very helpful points which are noted and the Council will continue to work closely with all special schools in transitional arrangements if proposals are approved.</p>

<ul style="list-style-type: none"> <li>• Concern that no such 'pathway' is identified into St Martins and St Clare's schools</li> <li>• Crucial to keep the 'exceptional needs band' for additionally complex pupils.</li> <li>• The higher funded bandings given for Kingsmead and Ivy House are fair, given the increased complex nature of their admissions.</li> </ul>	
<p><b>St Giles School co-ordinated a response from pupils, parents, carers, the governing body, staff, senior leadership team and wider community.</b></p> <p><u>Placement Criteria</u></p> <ul style="list-style-type: none"> <li>• The placement criteria appear quite limited, for example, no mention of complex health, medical or mental health needs with severe learning difficulties. More detail is needed.</li> <li>• There could be safeguarding issues if the school takes more complex and challenging children.</li> <li>• The criteria proposed by St Giles School should be implemented.</li> <li>• The criteria need to reflect all disabilities and capabilities, not a strict criteria.</li> </ul>	<p><u>Placement criteria</u></p> <p>The aim of the proposals is to provide clear and transparent placement criteria in order to help support parents, carers, children and young people. The criteria provide a framework for placing pupils in the most appropriate type of provision to meet their individual needs.</p> <p>Decisions on pupil placements will be made having regard to individual needs assessments and reviews as part of developing Education, Health and Care (EHC) plans.</p>

<p><u>SEND Fund Bandings</u></p> <ul style="list-style-type: none"> <li>• Pupils responded with concerns over the SEND fund banding review and with positive comments about their school.</li> <li>• Even though the budget has increased for SEND education, the budget at St Giles School will reduce. This means the pupils with the greatest need are receiving less.</li> <li>• The needs of children are not equal and so funding needs to be appropriate.</li> <li>• The quality of provision will be affected if funding is reduced. Health and safety issues could emerge.</li> </ul>	<p><u>SEND Fund Bandings</u></p> <p>The Council implemented a single per pupil SEND fund banding for each Special School and Enhanced Resource School from April 2018. The current funding system is historic and complex and there are significant differences in funding levels between the special schools. The aim is to create a more consistent and equitable funding approach across our City special schools.</p> <p>Whilst there will be a reduction to the St Giles School budget, as part of the process to ensure all special schools receive equitable levels of funding, the Council has committed significant additional funding of £911,000 over a three year period for special schools and enhanced resource schools.</p> <p>It is also important to note that exceptional needs funding can be applied for by special schools if a child or young person on roll has very complex needs that cannot be met from within existing budgets.</p>
<p><u>Pupil Pathways</u></p> <ul style="list-style-type: none"> <li>• Parents should have a choice in relation to secondary education.</li> <li>• St Giles School is the only primary special school in the City and there is a high demand for places. It is suggested that an expansion is considered.</li> </ul>	<p><u>Pupil Pathways</u></p> <p>By creating pupil pathways, it provides an early indication to parents of where their child is likely to access secondary provision. It will also enable more formal links to be created between school to ensure that a pupil's transition from primary to secondary education is as smooth as possible.</p> <p>There will be flexibility in the approach to pupil pathways to enable pupils to attend other schools, where appropriate.</p>

**g. Response from the National Deaf Children's Society**

Comment	Derby City Council Response
<p><u>Enhanced Resource School and Special School Placement Criteria</u></p> <ul style="list-style-type: none"> <li>Suggested amendments were made to the proposed criteria for making placements in primary and secondary enhanced resource schools (Reigate Park Primary School &amp; Allestree Woodlands School) for pupils with a hearing impairment.</li> </ul>	<p><u>Enhanced Resource School and Special School Placement Criteria</u></p> <p>The suggestions around the placement criteria have been carefully considered and updated criteria are appended to the Cabinet report.</p>
<p><u>Proposals to better align Enhanced Resource School Places</u></p> <ul style="list-style-type: none"> <li>The Council should utilise a 'graduated response' document that clears outlines approaches expected of professionals in mainstream settings and ensures benchmarking of actions carried out.</li> <li>The Council has not outlined in the consultation any rationale for reducing the number of places at Reigate Park Primary School from 26 to 21 for pupils with hearing impairment. It is not sufficient to say that this aligns with the actual number of placements made in September 2017.</li> </ul>	<p><u>Proposals to better align Enhanced Resource School Places</u></p> <p>The proposed change for Enhanced Resourced School provision for children and young people with Hearing Impairments relates to the proposed reduction from 26 places to 21 places at Reigate Park Primary School, a reduction of five places. This is so that the number of commissioned places meets with demand for the provision.</p> <p>As set out in the consultation document, the number of places offered at each Enhanced Resource School will be subject to review each year to ensure that they reflect demand for places.</p> <p>A Graduated Response Inclusion Strategy has been developed for consideration by Council Cabinet.</p>

<u>Proposal to establish a single Early Years Inclusion Fund</u> <ul style="list-style-type: none"> <li>The premise that the funding is distributed to all placements where there are children with SEND is supported. This does not mean support for any reduction in funding for these children.</li> </ul>	<u>Proposal to establish a single Early Years Inclusion Fund</u> <p>The comments are noted.</p>
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#### h. Response from Voices in Action Youth Council

Comment	Derby City Council Response
<p><b>What are the positives and negatives of children and young people with SEND attending local mainstream schools?</b></p> <p><b>Positive</b></p> <ul style="list-style-type: none"> <li>Integration – socialising, making/being with friends, part of the community.</li> <li>Understanding the needs of children and young people with SEND.</li> <li>Having the right equipment and technology for children and young people with SEND.</li> <li>Inclusive learning and motivation by being around other students.</li> <li>Better future and more independence.</li> </ul>	<p>Very helpful comments which have been carefully considered, including as part of the Equalities Impact Assessment.</p>

<p><b>Negative</b></p> <ul style="list-style-type: none"> <li>• Needs not being met – lack of resources and support, reasonable adjustments not being met, not understanding individual needs</li> <li>• Teachers not being trained to work with SEND or not providing one to one tuition/help</li> <li>• Exclusion – bullying, feeling alienated/left out, feeling shy/frightened</li> <li>• Being disrupted/being disruptive.</li> </ul>	
<p><b>What are the positives and negatives of primary pupils knowing which secondary enhanced resource schools they will be attending?</b></p> <p><b>Positive</b></p> <ul style="list-style-type: none"> <li>• Helps the child or young person be more prepared, feel comfortable, make friends and know about the resources available.</li> <li>• The child or young person can visit the school, have a say in making informed choices, get used to the environment and teachers.</li> <li>• Helps the school to prepare more, meet the needs of individual children and young people and train teachers</li> <li>• Helps parents to plan transport access to schools, time</li> </ul>	<p>Very helpful comments which have been carefully considered, including as part of the Equalities Impact Assessment.</p>

to make arrangements, find others that are going to the same school and fall into a routine.

**Negative**

- Isolation and fear including feeling left out, away from friends, fear of bullying, not knowing anyone, not going to the same school as siblings, panic over transition, loss of existing school friends.
- Lack of choice and Independence including limited school options, the school might not be the catchment area school, limited employment options, not enough space to go to the school of choice, not meeting needs, not having the resources and access.



## Appendix 3

### Proposed Placement Criteria

## Special School Placement Criteria

### St Andrew's School, St Clare's School, St Giles School and St Martin's School – Criteria

All students who are admitted to **[School Name]** have an Education and Health Care (EHC) Plan. Derby City Council is the Local Authority responsible for issuing EHC Plans and will decide whether a special school placement is appropriate.

If a decision is taken to seek a placement in a special school, then schools will be approached to determine whether or not they can meet the needs of the young person, as set out in the EHCP.

Parents are entitled to give an opinion about their preferred school.

**[Special School Name]** offers places for children whose needs can be described as:

- cognition and learning needs
- specific learning difficulties
- severe learning difficulties.

Children with these learning needs may also have:

- behaviour, emotional and social development needs (*SEMH*)
- communication and interaction needs
- autistic spectrum disorder
- sensory and/or physical needs
- visual impairment
- hearing impairment
- multi-sensory impairment
- physical disability

When a placement is made at **[School Name]**, we encourage parents to visit the school and meet with staff.

Once a school has been named on the EHC Plan then there is a statutory obligation to admit the child.

## **All-through Provision (Age Range 2-19)**

### **Ivy House School –Criteria**

Ivy House School offers places for pupils with:

- Profound and multiple learning difficulties.
- Complex health/ medical needs with profound or severe learning difficulties.
- Complex physical needs with profound or severe learning difficulties.
- Profound and complex learning needs.

Pupils considered will have difficulties in one or more of the following areas:

- fully dependent on adult support to meet all physical, medical care and educational needs.
- fully dependent on adult support to meet all care or mobility needs.
- demonstrate little evidence of meaningful social relationships, resulting in social isolation, vulnerability and disengagement.
- learning of levels well below  $\frac{1}{2}$  chronological age.
- working within P scales 1-4 at the end of Primary School
- working within P scales 1-8 and L1 or under at the end of Secondary School
- delayed personal and social skills well below  $\frac{1}{2}$  chronological age.
- presence of additional difficulties.

## **Secondary Provision**

### **The Kingsmead School –Criteria**

The Kingsmead School provides places for young people with behavioural, social, emotional and mental health difficulties where challenging behaviour is the primary need and most significant barrier to learning and progress.

Pupils considered will have difficulties in one or more of the following areas:

- on leaving Key Stage 2 (Age 11) be at level 2 or above in English/Maths/Science/PSE
- on leaving Key Stage 3 (Age 14) be at Level 3 or above in all areas
- have additional needs which may include:

- an attachment disorder.
- Attention Deficit Hyperactivity Disorder.
- Social, Emotional Mental Health needs.
- An Autistic Spectrum Condition, including Aspergers.
- PDA/oppositional disorder.
- A Speech, language, communication disorder.

## **Enhanced Resource Schools for Pupils with Communication and Interaction Needs**

### **Criteria for admission to Primary & Secondary Enhanced Resource Places for children and young people with Communication and Interactions needs / Autism**

Pupils considered will have difficulties in one or more of the following areas:

- acute communication difficulties which seriously inhibit their participation, understanding and contribution to activities in a classroom/setting.
- persistent difficulties in making and maintaining relationships, resulting in frequent social isolation and vulnerability, with some disengagement.
- persistent difficulties following instructions and accepting adult direction, and maintaining attention to task.
- evidence of need for a functional based curriculum in isolation from mainstream provision with specialist support.
- evidence of rigid thought, making the pupil inflexible and unlikely to cope with change, resulting in an intense response.
- limited progress across subject areas due to problems with particular aspects of communication development which have a great impact on learning.
- difficulties sharing a work space and require small group settings to facilitate access to learning (up to 8 children).
- present challenging behaviour, but will accept and respond to regulating strategies from familiar adults.
- maintain engagement in independent activity with appropriate strategies and support.

## **Enhanced Resource Schools for Children and Young People with Social, Emotional and Mental Health (SEMH) Needs**

## **Criteria for admission to Primary & Secondary Enhanced Resource Places for children and young people with Social, Emotional and Mental Health needs**

Pupils considered will have difficulties in one or more of the following areas:

- a pattern of persistent SEMH, inhibiting most participation in, understanding of & contribution to activities & learning in the classroom, resulting in very limited progress in all areas.
- a pattern of persistent disruption to social and emotional wellbeing, resulting in unhappiness/ stress. Possible prolonged periods of absence/disengagement.
- a pattern of acute responses, resulting in prolonged periods of uncooperative behaviour and/or emotional withdrawal.
- a pattern of repeated and exceptional behaviours which could injure or endanger self/others. High level of rejection & social isolation, despite a carefully planned support package.
- a pattern of persistent difficulties in making and maintaining relationships, resulting in frequent social isolation and vulnerability, with disengagement from education, social and family life.

## **Enhanced Resource Schools for Children and Young People with a Hearing Impairment**

### **Criteria for admission to Primary & Secondary Enhanced Resource Places for children and young people with hearing impairments.**

Pupils considered will have difficulties in one or more of the following areas:

- have moderate to severe hearing loss (41 –70 dB).
- have severe to profound hearing loss (71 – 95+ dB).
- need a sign supported environment for a minimum of 50% of the school curriculum.
- need regular individual or small group sessions for Speech and Language development and specialist teaching in other contexts including the development of audiological independence.
- need Speech and Language Therapy support because of hearing loss.
- need a modified curriculum, including modification of resources.
- need access to specialist teacher support to meet varying needs.
- require regular teaching support and/or monitoring from a Qualified Teacher of the Deaf.
- need access to an appropriate environment, with consideration to acoustics.
- need a high level of pastoral care due to hearing loss/ additional emotional and/or behaviour and/or learning and/or physical/mobility difficulties
- would benefit from access to a peer group of other deaf children and young people to support their social and emotional wellbeing
- have additional emotional and/or behaviour and/or learning and/or physical/mobility difficulties.

- are performing below their chronological age in language and literacy assessments.

## **Enhanced Resource Schools for Children and Young People with a Visual and / or Physical Impairment**

### **Criteria for admission to Primary & Secondary Enhanced Resource Places for children and young people with visual and physical impairments.**

Pupils considered will have difficulties in one or more of the following areas:

- have a visual impairment that has a significant impact on access to the curriculum.
- have a fragile or deteriorating condition.
- need a supported environment for 50 – 85% of school curriculum.
- have additional needs, but the pupil's principle special educational need will relate to visual impairment.
- require a significantly modified and adapted mainstream curriculum through a moderated curriculum into large print, or into a tactile medium such as Braille.
- require daily support or oversight from a Qualified Teacher for the Visually Impaired.
- benefit from educational and social inclusion with fully sighted and visually impaired peers.
- require specialist teaching, including withdrawal or in-class support, in using alternative access methods.
- require alternative curriculum opportunities e.g., ICT for Visually Impaired Pupils, GCSE Short Course.
- need a high level of pastoral care due to sight loss.
- require a high level of emotional support and adjustments due to a degenerating physical condition.

## Appendix 4

### Enhanced Resource Schools: Proposed Typical Pupil Pathways

#### Type of Need: Communication and Interaction Needs / Autism

##### PRIMARY

Brackensdale ER Primary  
School – 28 places

Bemrose School (Primary  
Phase) – 14 places

Springfield Primary School  
– 21 places



##### SECONDARY

The Bemrose School  
(Secondary Phase) –  
45 places

#### Type of Need: Social, Emotional and Mental Health (SEMH) Needs

This provision is subject to further consideration following consultation responses.

#### Type of Need: Hearing Impairment

##### PRIMARY

Reigate Park Primary  
School – 21 places



##### SECONDARY

Allestree Woodlands  
School – 14 places

#### Type of Need: Visual and / or Physical Impairment

##### PRIMARY

Markeaton Primary  
School – 4 places



##### SECONDARY

Saint Benedict Catholic  
Voluntary Academy – 25  
places

*Please note that, where an Annual Review identifies that there has been a significant change in a child's needs, it might be appropriate for the child to transfer to a special school.*

### **Enhanced Resource School (ERS) – Proposed Places**

- a. Early Years ERS provision
- b. Provision for Pupils with Communication and Interaction Needs
- c. Provision for Pupils with Social, Emotional and Mental Health Needs
- d. Provision for Pupils with a Hearing Impairment
- e. Provision for Pupils with a Visual and / or Physical Impairment

#### **a. Early Years ERS Provision**

School Name	Proposed Number of ERS Places	Notes
Central Community Nursery School	Proposals to be considered.	
Lord Street Nursery School	Proposals to be considered	

#### **b. Provision for Pupils with Communication and Interaction Needs**

##### **Primary Provision**

School Name	Proposed Number of ERS Places	Notes
Brackensdale ER Primary School	28	The Council has commissioned a total of 57 Enhanced Resource School (ERS) places at Brackensdale ER Primary School in 2018-19, which are made up of 'mainstream' ERS places and Ark and Phoenix places. The proposal is to decommission the mainstream ERS places, and to align the Ark and Phoenix provision to 28 places, which equates to 4 pupils per year group for future placements. It is important to note that no existing pupil placements or funding for these pupils will be affected. The proposals, if approved, will start to be implemented from September 2019. Transitional funding arrangements and financial protection proposed to support the school.

<b>Bemrose School (Primary Phase)</b>	14	Alternative proposal to Meadow Farm Primary School, following consultation.
<b>Springfield Primary School</b>	21	Proposal to increase from 19 places to 21 places.
<b>Total</b>	<b>63</b>	

## Secondary Provision

<b>School Name</b>	<b>Proposed Number of ERS Places</b>	<b>Notes</b>
<b>Bemrose School (Secondary Phase)</b>	45	No change to the overall number of places. There is a proposal to remove 'mainstream' ERS places, with funding available to provide additional support in local mainstream settings. Alongside this, there is a proposal to increase places in the Elmtree Unit.
<b>Total</b>	<b>45</b>	

### c. Provision for Pupils with Social, Emotional and Mental Health Needs

This provision is subject to further consideration following consultation responses from Alvaston Junior School and Lees Brook School.

### d. Provision for Pupils with a Hearing Impairment

#### Primary Provision

<b>School Name</b>	<b>Proposed Number of ERS Places</b>	<b>Notes</b>
<b>Reigate Park Primary School</b>	21	Proposal to reduce from 26 places to 21 places to align with the actual number of placements being made.
<b>Total</b>	<b>21</b>	

#### Secondary Provision

<b>School Name</b>	<b>Proposed Number of ERS Places</b>	<b>Notes</b>
<b>Allestree Woodlands School</b>	14	No changes proposed.
<b>Total</b>	<b>14</b>	

### e. Provision for Pupils with a Visual and / or Physical Impairment



### Primary Provision

School Name	Proposed Number of ERS Places	Notes
Markeaton Primary School	4	No changes proposed.
<b>Total</b>	<b>4</b>	

### Secondary Provision

School Name	Proposed Number of ERS Places	Notes
Saint Benedict, Catholic Voluntary Academy	25	No changes proposed.
<b>Total</b>	<b>25</b>	

[Please see SEND Joint Strategic Needs Assessment circulated separately]

## Appendix 7

### Capital Funding Proposals: Bemrose School & St Clare's School – Detailed Capital Programme Proposals

		2018/19	2019/20	2020/21 phasing of 18/19 and 19/20 Allocations	Total
<b>1. Available Funding</b>					
<b>Special Provision Fund</b>	DfE - Special Provision Capital Fund (as allocated and as currently phased on DCC capital programme)	£275,162	£275,162	£275,162	£825,486
	<b>Proposed Revised Phasing of DfE Special Provision Capital Fund</b>	<b>£20,000</b>	<b>£530,324</b>	<b>£275,162</b>	<b>£825,486</b>
<b>Basic Need</b>	Current unallocated Basic Need funding (as per original DfE allocations)	£2,274,910	£12,768,087	£0	£15,042,997
	Current unallocated Basic Need funding (as per current DCC capital programme phasing)	£80,000	£14,962,997	£0	£15,042,997
	<b>Proposed revised phasing of DCC Capital Programme Basic Need funding to reflect proposed schemes</b>	<b>£80,000</b>	<b>£1,669,676</b>	<b>£13,293,321</b>	<b>£15,042,997</b>
<b>Total Available Funding</b>	<b>Proposed revised phasing of combined Special Provision Capital Fund and Basic Need combined</b>	<b>£100,000</b>	<b>£2,200,000</b>	<b>£13,568,483</b>	<b>£15,868,483</b>
<b>2.1 Proposed Allocations (by scheme)</b>					
<b>The Bemrose School</b>	DfE - Special Provision Capital Fund	£10,000	£265,162	£137,581	£412,743
	Basic Need Funding	£70,000	£134,838	£2,582,419	£2,787,257
	<b>Bemrose Scheme Total</b>	<b>£80,000</b>	<b>£400,000</b>	<b>£2,720,000</b>	<b>£3,200,000</b>
<b>St Clare's Special School</b>	DfE - Special Provision Capital Fund	£10,000	£265,162	£137,581	£412,743
	Basic Need Funding	£10,000	£34,838	£3,542,419	£3,587,257
	<b>St Clare's Scheme Total</b>	<b>£20,000</b>	<b>£300,000</b>	<b>£3,680,000</b>	<b>£4,000,000</b>
<b>2.2 Proposed Total Allocations (summary by funding stream)</b>					
<b>Special Provision Fund</b>	Total DfE - Special Provision Capital Fund Commitment to Bemrose and St Clare's combined	£20,000	£530,324	£275,162	£825,486
<b>Basic Need</b>	Total Basic Need Commitment to Bemrose and St Clare's combined	£80,000	£169,676	£6,124,838	£6,374,514
<b>Total</b>	<b>Total Proposed Commitment to Bemrose and St Clare's</b>	<b>£100,000</b>	<b>£700,000</b>	<b>£6,400,000</b>	<b>£7,200,000</b>
<b>3. Remaining Allocations</b>					

<b>Special Provision Fund</b>	Remaining Unallocated DfE - Special Provision Capital Fund	£0	£0	£0	<b>£0</b>
<b>Basic Need</b>	Proposed phasing of remaining 2019/20 Basic Need allocation - to be prioritised for Basic Need schemes currently undergoing careful consideration	£0	£1,500,000	£7,168,483	£8,668,483

# Equality impact assessment form

**Directorate** People

**Service area** Commissioning

**Name of policy, strategy, review or function**

**being assessed** Proposals to improve provision in Derby for children and young people with Special Educational Needs and Disabilities (SEND)

**Date of assessment** Thursday, 16 November 2017

**Name of Director/Head of Service signing it**

**off** – Gurmail Nizzer, Director of Commissioning (Acting)

**Decision of Cabinet, Personnel Committee or**

**Chief Officer Group** – Council Cabinet on 10

October 2018

**Date published on website** 2 October 2018

## **Equality impact assessment – please read this section first before you do the assessment**

This is our equality impact assessment form to help you equality check what you are doing when you are about to produce a new policy, review an older one, write a strategy or plan or review your services and functions. In fact you need to do an equality impact assessment whenever a decision is needed that affects people and **before** that decision is made.

So why do we need to do equality impact assessments? Although the law does not require us to do them now, the courts still place significant weight on the existence of some form of documentary evidence of compliance with the **Public Sector Equality Duty** when determining judicial review cases. This method helps us to make our decisions fairly, taking into account any equality implications, so yes we still need to do them.

The Public Sector Equality Duty is part of the Equality Act 2010 and this Duty requires us as a public body to have ‘**due regard**’ to eliminating discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Act. It requires us to advance equality of opportunity and foster good relations between people who share a ‘**relevant protected characteristic**’ and people who don’t.

Having ‘due regard’ means:

- removing or minimising disadvantages suffered by people due to their protected characteristics
- taking steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people
- encouraging people with certain protected characteristics to participate in public life or in other activities where the participation is disproportionately low.

The protected characteristics are:

- age

- disability
- gender identity
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

This completed form should be attached to any Chief Officer Group, Cabinet or Personnel Committee report to help elected members make their decisions by taking the equality implications into account. Equality impact assessments **must be done before** decisions are made. Include the Cabinet or Personnel Committee's decision on the front sheet when you know it.

You'll find that doing these assessments will help you to:

- understand your customers' and communities needs
- develop service improvements
- improve service satisfaction
- demonstrate that you have been fair and open and considered equality when working on re-structuring
- make sure you pay due regard to the requirements of the Public Sector Equality Duty.

Don't do the form by yourself, get a small team together and make sure you include key people in the team such as representatives from our Diversity Forums and employee networks and you could invite trade union representatives too – the more knowledge around the table the better. You also need to decide how and who you will consult with to help inform the equality impact assessment. Our Lead on Equality and Diversity can help with useful contacts – we have a team of people who are used to doing these assessments and can help with information on barriers facing particular groups and remedies to overcome these barriers.

You'll need to pull together all the information you can about how what you are assessing affects different groups of people and then examine this information to check whether some people will be negatively or positively affected. Then you'll need to look at ways of lessening any negative effects or making the service more accessible – this is where your assessment team is very useful and you can also use the wider

community. Against every negative impact you will need to complete the mitigation section to explain how you will lessen the impact.

Agree an equality action plan with your assessment team, setting targets for dealing with any negative effects or gaps in information you may have found. Set up a way of monitoring these actions to make sure they are done and include them in your service business plans.

When you have completed the assessment, get it signed by your Head of Service or Service Director and **send it to our Lead on Equality and Diversity for checking and to publish on our website.** It is a public document so must not contain any jargon and be easy to understand.

Remember, we need to do these assessments as part of our everyday business, so we get our equality responsibilities right and stay within the law – Equality Act 2010.

### **Equality groups and protected characteristics**

These are the equality groups of people we need to think about when we are doing equality impact assessments and these people can be our customers or our employees and job applicants...

- Age equality – the effects on younger and older people
- Disability equality – the effects on the whole range of disabled people, including Deaf people, hearing impaired people, visually impaired people, people with mental health issues, people with learning difficulties and people with physical impairments
- Gender identity – the effects on trans people
- Marriage and civil partnership equality
- Pregnancy and maternity equality - women who are pregnant or who have recently had a baby, including breast feeding mothers



- Race equality – the effects on minority ethnic communities, including newer communities, gypsies and travellers and the Roma community
- Religion and belief or non-belief equality – the effects on religious and cultural communities, customers and employees
- Sex equality – the effects on both men and women and boys and girls
- Sexual Orientation equality – the effects on lesbians, gay men and bisexual people

### **Contact for help**

Ann Webster – Lead on Equality and Diversity

[ann.webster@derby.gov.uk](mailto:ann.webster@derby.gov.uk)

Tel 01332 643722 Minicom 01332 640666 Mobile 07812301144

### **The form**

We use the term ‘policy’ as shorthand on this form for the full range of policies, practices, plans, reviews, activities and procedures.

Policies will usually fall into three main categories...

- Organisational policies and functions, such as recruitment, complaints procedures, re-structures
- Key decisions such as allocating funding to voluntary organisations, budget setting
- Policies that set criteria or guidelines for others to use, such as criteria about school admissions, procurement methods, disabled facilities grants, on street parking bays

If in doubt – it's better and safer to do an Equality Impact Assessment than not to bother! You never know when we may get a legal challenge and someone applies for Judicial Review.

### **What's the name of the policy you are assessing?**

Proposals to improve provision in Derby for children and young people with Special Educational Needs and Disabilities (SEND)

### **The assessment team**

Team leader's name and job title – Paula Nightingale, Head of Inclusion Services

Other team members were from the following organisations:

<b>Organisation</b>	<b>Area of expertise</b>
Umbrella Derby and Derbyshire	Supporting parents and carers of pupils with SEND.
Derby City Council	Educational Psychology
Derby City Council	Advising and supporting parents and carers of pupils with SEND.
Derby City Council	Specialist Teaching Service Teams
Parent Carers Together	Representing parents and carers of children and young people with SEND.
Derby City Council	Health & Safety

In addition, the specialist provision proposals were discussed at the meeting of the Voices in Action (VIA) Youth Council on 10 October 2017. The VIA Youth Council identified positives and negatives relating to the proposals. The views of the young people have been included in this Equalities Impact Assessment.

### **Step 1 – setting the scene**

Make sure you have clear aims and objectives on what you are impact assessing – this way you keep to the purpose of the assessment and are less likely to get side tracked.

**1 What are the main aims, objectives and purpose of the policy? How does it fit in with the wider aims of the Council and wider Derby Plan? Include here any links to the Council Plan, Derby Plan or your Directorate Service Plan.**

The Children and Families Act 2014 secures the general presumption in law of mainstream education in relation to decisions about where children and young people with Special Educational Needs (SEN) should be educated and the Equality Act 2010 provides protection from discrimination for disabled people.

As set out in the Special Educational Needs & Disability (SEND) Code of Practice 0-25 years, all children and young people are entitled to an appropriate education, one that is appropriate to their needs, promotes high standards and the fulfilment of potential. The aim is that children and young people with SEND will have aspirations that are as high as any other young person's, they achieve well at school and college, and lead fulfilling, happy lives.

Derby City Council is committed to improving outcomes for children and young people with SEND. A SEND Vision for Derby has been developed working closely with our partner organisations. The SEND Vision for Derby is attached as Appendix 1 to this Equalities Impact Assessment.

The SEND Vision sets out the key aims of Derby's children and young people with SEND and ways in which the Council, service providers and partners will need to work together to achieve those outcomes. The Vision sets out that children and young people with SEND want to:

- Be happy, healthy and safe with good relationships.
- Be informed about the choices they have available.
- Feel involved in setting their own goals and types of support.
- Be able to access the right support at the right time.
- Live independently and achieve their full potential.

Following very careful consideration and initial consultation with parent representatives, SEND partners and headteachers, proposals have been developed to improve Derby's specialist provision for children and young people with Special Educational Needs and Disabilities SEND.

The key proposals include:

- f. Updating Enhanced Resource School and Special School Pupil Placement Criteria to help ensure that children and young people with SEND are placed in the most appropriate type of school for their individual needs and to provide transparent and clear criteria for children, young people and their families


- g. A fresh look at specialist provision to ensure it is relevant to current needs of children and young people in Derby, for example, proposals have been developed to create specialist provision to meet with Social, Emotional and Mental Health Needs, which the City does not currently have.
- h. Improving SEND pupil pathways and alignment between primary and secondary Enhanced Resource School placements to help effective transition planning for Children.
- i. Developing an Early Years Inclusion Fund for all Early Years providers as a single source of funding to support the inclusion of children with SEND.
- j. Capital investment for Enhanced Resource School Provision

Please note that there are no proposals to reduce overall funding for children and young people with Special Educational Needs and Disabilities.

The table below sets out how the proposals will contribute towards the five aims for children and young people with SEND, as set out in the SEND Visions for Derby.

Be happy, healthy and safe with good relationships	Be informed about available choices	Feel involved in setting their own goals and type of support	Be able to access the right support at the right time	Live independently and achieve their full potential.
Proposals aim to ensure that pupils with SEND are placed in the most appropriate educational settings based on individual needs, accessing mainstream school places, where possible, with support provided through schools to ensure pupils are happy, healthy, safe and forming good relationships	Pupil pathways from primary to secondary SEND provision provide an early indication of where a child or young person is likely to access secondary education. This enables outreach between schools to ensure a smooth transition at secondary transfer.	Through Education, Health and Care Plans, outcomes and long term aims are set for a child / young person, listening to their views and the views of their parents / carers.	Schools are able to apply for funding through Locality Panels to provide additional resources and support for pupils with SEND.	Proposals aim to increase local placements for children and young people with SEND. This is important in order to encourage the integration of young people in the local community, as part of preparation and transition planning to adulthood and independent living.

with their peers.



**2 Who delivers/will deliver the policy, including any consultation on it and any outside organisations who deliver under procurement arrangements?**

- The Council's Vulnerable Learners' Service
- All Derby Schools
- NHS Health through contributing to Education, Health and Care Plans
- Parents/Carers/Young People

**3 Who are the main customers, users, partners, employees or groups affected by this proposal?**

- Children and young people with special educational needs and disabled people resident in Derby, particularly those aged/approaching 0-16 years.
- Families/Parents/Carers,
- Educational establishments/settings for pupils with Special Educational Needs and Disabled Children
- NHS Health Representatives in relation to Education Health and Care Plans.

**Step 2 – collecting information and assessing impact**

**4 Who have you consulted and engaged with so far about this policy, and what did they tell you? Who else do you plan to consult with? – tell us here how you did this consultation and how you made it accessible for the equality groups, such as accessible locations, interpreters and translations, accessible documents.**

**Pre-consultation engagement**

- To help shape the proposals, eight representative Headteacher engagement meetings were held. The meetings included Headteacher representation from across the City's special schools, enhanced resource schools and mainstream schools at nursery, primary and secondary level.

*Throughout the headteacher meetings, there was support for the principles of inclusion and increasing local school placements, wherever possible and appropriate, for children and young people with SEND.*

*It was suggested that gaps in specialist provision should be identified and changes made to ensure the provision offered in Derby is appropriate to current needs. Provision should be clearly defined and strong criteria developed for placements. It was suggested that pupil pathways should be considered with clear entry and exit transition points.*

*The discussions that took place during the meetings of the group helped inform the proposals that have been developed for consultation.*

- Initial engagement meetings were held with SEND partners, for example, the Special Educational Needs and Disabilities Information Advice and Support Service (SENDIASS) and Umbrella.
- The Council has discussed proposals with our regional Department for Education SEND Adviser.
- A presentation was made to SEND Commissioning Board Members which includes SEND partners from across a range of organisations.

**Formal consultation**

- Public engagement meetings for parents and carers of children and young people with SEND. The SENDIASS Team, Umbrella and Parents and Carers Together have provided support with identifying parent / carer representatives to invite to the meetings.

- Engagement with the Council's Voices in Action Youth Council to understand views of children and young people.
- Engagement with all primary and secondary schools at headteacher meetings, via email and an article in the Schools' Circular.
- SEND Commissioning Board members consulting with partner organisations.
- Meeting with a representative of The National Deaf Children's Society on 12 December 2017.
- An update on the proposals was provided at a meeting of the Deaf and Hearing Impaired People's Commitment Group on 7 February 2018.
- Proposals published on the Council's Your City, Your Say Webpage so that anyone with an interest may respond to the consultation. This includes a consultation document, summary consultation document, newsletter for parents and carers and list of frequently asked questions.
- Derby Newsroom Articles
- Contact details provided for people who require the consultation documents in different formats.

**5 Using the skills and knowledge in your assessment team, and from any consultation you have done, what do you already know about the equality impact of the policy on particular groups? Also, use any other information you know about such as any customer feedback, surveys, national research or data. Indicate by a tick for each protected characteristic group whether this is a negative or a positive impact. If it's negative, fill in the mitigation section as well to explain how you are going to lessen the impact.**

### **Age**

<b>What do you already know?</b>	<b>Positive impact</b>	<b>Negative impact</b>	<b>Mitigation</b>
There are currently different	<b>X</b>		

What do you already know?	Positive impact	Negative impact	Mitigation
<p>SEND funding routes available for early years providers. The proposal is to bring together all of the funding in to a single pot which all early years providers can apply to for funding to support children with SEND.</p> <p>This would result in a fair, transparent and consistent funding route which would be available for all early years providers.</p>			
<p>Enhanced Resource School nurseries are fully trained on how to meet the needs of children with SEND. We need to make sure that members of staff in other early years settings are trained to provide the same level of support.</p> <p>Some members of the group raised concerns around the proposal for the Enhanced Resource School funding allocated to Central Community Nursery School &amp; Lord Street Nursery School to be re-allocated to the overall Early Years Inclusion Fund. They felt that other age phases still had a pathway for Enhanced Resource School provision and the decision to remove the early years pathway could prevent early intervention.</p> <p>Other members of the group felt that the Early Years Inclusion Fund is intended to support the inclusion, participation and progress of</p>		<p><b>X</b></p>	<p>An Early Years Inclusion Fund is already in place to support children in private, voluntary and independent nurseries. The proposal is to re-allocate enhanced resource nursery funding to the Early Years Inclusion Fund to create a single and consistent source of funding for all early years providers.</p> <p>PVI nurseries are already provided with guidance on SEND and are sign-posted to training courses by STePS. The new graduated response guidance has been written to include guidance for all early years settings. Maintained settings will be offered training in the graduated response to support them to include children with SEND. The area SENCO team will continue to support PVI settings.</p>



<b>What do you already know?</b>	<b>Positive impact</b>	<b>Negative impact</b>	<b>Mitigation</b>
children with special educational needs and disabled children in the early years. Their view was that the funding is for children up to the end of Foundation Stage 1, to enable them to access their early years entitlement and in support of early intervention and inclusion.			

### **Disability**

<b>What do you already know?</b>	<b>Positive impact</b>	<b>Negative impact</b>	<b>Mitigation</b>
<p>The proposals aim to support children, young people and their families by ensuring that pupils with SEND are attending a school most appropriate to their individual needs. This would be done through proposals to update pupil placement criteria for special school placements and enhanced resource school placements.</p> <p>This is likely to free up capacity in Special Schools and Enhanced Resource Schools, enabling them to take pupils that may otherwise be placed in distant placements.</p> <p>Local placements for children and young people with SEND are important in order to support the family and encourage the integration of young people in the local community, as part of preparation and transition planning to adulthood.</p>	<b>X</b>		

What do you already know?	Positive impact	Negative impact	Mitigation
The proposals aim to address gaps in provision, for example, we currently do not have specific specialist provision for pupils with social, emotional and mental health needs. There are proposals to introduce this provision. We've also considered the numbers of places available at each Enhanced Resource School and proposed changes so that places match with anticipated demand.	X		
<p>The Voices in Action Youth Council felt that there would be positives for children and young people with SEND in attending their local mainstream schools including integration, socialising, making/being with friends and being a part of the local community.</p> <p>Mainstream inclusion could help develop a better understanding of young people with SEND and how their needs can be met. It would assist with inclusive learning and motivation by being with other students. It could lead to a better future and more independence.</p>	X		
The Voices in Action Youth Council also identified issues with mainstream inclusion including needs not being met, a lack of resources and support, reasonable adjustments not being met and schools not understanding individual		X	<p>The Council is committed to inclusive education for children and young people with SEND in our mainstream schools, enhanced resource schools and special schools.</p> <p>Under the SEND Code of Practice, every school is required to identify</p>

What do you already know?	Positive impact	Negative impact	Mitigation
<p>needs.</p> <p>There could be an issue with teachers not being trained to work with children with SEND or not providing one to one tuition/help.</p> <p>Pupils could feel excluded.</p>			<p>and address the SEN of the pupils that they support.</p> <p>All mainstream schools receive notional SEND funding. In Derby, around £23 million per year is allocated to mainstream schools, as part of their delegated budgets, as notional SEND funding. All mainstream school Governing Bodies are asked to ensure that SEND Notional Funding is carefully prioritised for pupils with SEND. This funding could be used in relation to resources and support for individual pupils as well as wider staff training and professional development to specifically meet the needs of children with SEND.</p>
<p>The proposals seek to improve SEND pupil pathways between infant, junior and secondary Enhanced Resource School placements.</p> <p>By creating pupil pathways between primary and secondary ER provision, it provides an early indication to the child and their parents of where the child is likely to access secondary provision.</p> <p>It will also enable more formal links to be created between primary and secondary ER school provision, including establishing outreach from secondary schools to primary schools to ensure that a pupils transition from primary to secondary education is as smooth as possible.</p>	X		

What do you already know?	Positive impact	Negative impact	Mitigation
<p>The Voices in Action Youth Council identified positives for having pupil pathways between primary and secondary specialist provision. They felt it would help the child or young person be more prepared, feel comfortable, make friends and know about the resources available to them when they transfer to secondary education.</p> <p>The child or young person could visit the secondary school, have a say, make informed choices and get used to the environment and teachers.</p> <p>The pupil pathways could help schools to prepare more, meet the needs of individual children and young people and ensure teachers are appropriately trained.</p> <p>The pupil pathways could help parents to plan transport and access to schools, give time to make arrangements and find others children and young people that are going to the same school.</p>	X		
<p>The Voices in Action Youth Council also identified issues with pupil pathways such as children and young people feeling isolated and / or fearful.</p> <p>They could feel left out or moved away from their friends. They may not go to the same school as siblings and panic over transition or</p>		X	<p>There will be flexibility in the approach to pupil pathways to enable pupils to attend other schools, where appropriate. For example, where an Annual Review identifies that there has been a significant change in a child's needs, it might be appropriate for the child to transfer to a special school.</p> <p>The Council will, of course, very</p>

<b>What do you already know?</b>	<b>Positive impact</b>	<b>Negative impact</b>	<b>Mitigation</b>
<p>loss of existing school friends.</p> <p>The pupil pathways could result in lack of choice and independence, with limited school options. The secondary specialist school may not be the catchment area school. There may not be enough space to go to the school of choice.</p>			carefully consider the views and wishes of children and young people in taking any decisions on SEND placements.
There are proposals to develop capital projects to invest in Enhanced resource School buildings to increase and improve provision for children and young people with SEND. This is to ensure sufficient and appropriate classrooms and spaces for children and young people with SEND.	<b>X</b>		
It's important that children moving to the city can be accommodated, even if provision is full		<b>X</b>	<p>In relation to children and young people with SEND moving to the City, by continuing to support mainstream inclusion, it will open up options for more pupils to be taught in mainstream schools.</p> <p>The numbers of places available will be kept under review to ensure that provision can meet with demand.</p>
The criteria for placements in Enhanced Resource Schools for pupils with communication and interaction needs don't include high functioning pupils with ASD. It's not clear from the criteria which type of school these pupils would attend. Based on the criteria, it appears easier for a child with communication and interaction needs to be		<b>X</b>	The placement criteria don't specifically include high functioning pupils with autism. The individual needs of each pupil will be assessed through developing an Education Health and Care Plan, having regard to the views and wishes of the parents and carers.

<b>What do you already know?</b>	<b>Positive impact</b>	<b>Negative impact</b>	<b>Mitigation</b>
offered a placement at a special school rather than an enhanced resource school.			
The criteria focus on the child and whether they meet the criteria for a placement at a particular type of school. The criteria do not state what the child will be offered and how the school will meet their needs.		<b>X</b>	The purpose of the criteria is to provide a framework for placing pupils in the correct type of school to meet their individual needs. It will need to be made clear in any parents / carer communication that these are placement criteria, and not information on what schools are able to offer, which will usually be accessible to parents and carers on school websites.
The proposal to consider a Specialist Teaching Service to support schools in accommodating mainstream pupils was considered positive for children and young disabled people	<b>X</b>		

### **Gender identity- trans**

<b>What do you already know?</b>	<b>Positive impact</b>	<b>Negative impact</b>	<b>Mitigation</b>
Trans children's needs will continue to be taken into account along with their impairment needs.	<b>X</b>		

### **Marriage and Civil Partnership**

<b>What do you already know?</b>	<b>Positive impact</b>	<b>Negative impact</b>	<b>Mitigation</b>
No impact identified for this equality group.			

### **Pregnancy and maternity**

<b>What do you already</b>	<b>Positive</b>	<b>Negative</b>	<b>Mitigation</b>
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<b>know?</b>	<b>impact</b>	<b>impact</b>	
There are already procedures in place for young people at school who are pregnant, including those with SEND. We need to make sure that staff who are pregnant have had full pregnancy risk assessments concerning working with children who may have behavioural and emotional difficulties. Young people may be affected if they feel that their teacher has to do more for them than perhaps the other pupils.		<b>X</b>	With regard to pregnancy, mainstream Schools will be reminded that they must spend their notional SEND funding on including children and young people with SEND. This may consist of wider staff training and professional development relating to teaching and supporting children with SEND, as well as training on the wellbeing of staff. It is in Employment Legislation that pregnant women at work must have pregnancy risk assessments

## **Race**

<b>What do you already know?</b>	<b>Positive impact</b>	<b>Negative impact</b>	<b>Mitigation</b>
The location of Enhanced Resource Schools in the City might result in certain groups being further away from specific types of provision.		<b>X</b>	It's not clear whether the location of Enhanced Resource School provision does impact on race as any child with SEND might need to travel outside of their local community to attend an Enhanced Resource School or Special School. By increasing mainstream inclusion and local school places for children with SEND, it is likely to reduce school travel time for more pupils.

## **Religion or belief or none**

<b>What do you already know?</b>	<b>Positive impact</b>	<b>Negative impact</b>	<b>Mitigation</b>
Some parents / carers might not wish to send their child to a school with a particular religious ethos.		<b>X</b>	With regard to parents not wishing to send their child to a school with a particular religious ethos, the views of parents, carers and the child will be carefully

Children and young people's religious and cultural needs will be taken into account along with their impairment needs			considered when developing Education Health and Care Plans and making placements.
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## Sex

What do you already know?	Positive impact	Negative impact	Mitigation
As an indirect impact, if any redundancies arise at nursery schools as a result of the proposals, these are likely to impact on females more than males.		X	It's not clear whether redundancies will arise at this stage from the proposed re-allocation of nursery enhanced resource school funding to the Early Years Inclusion Fund. If any redundancies do arise, the Council will work together closely with the staff and nurseries and will follow all HR procedures.
The proposal to increase places at The Bemrose School is positive as currently the majority of pupils on roll at the school with communication and interaction needs are male. This might put off females from wishing to go there. Higher numbers are likely to mean that there would be more females on roll, perhaps making them feel more integrated and able to form friendship groups.	X		NA – Positive impact identified.

## Sexual orientation

What do you already know?	Positive impact	Negative impact	Mitigation
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Children's and young people's sexual orientation will be taken into account along with their impairment needs			
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**Important** - For any of the equality groups you don't have any information about, then make it an equality action at the end of this assessment to find out. This doesn't mean that you can't complete the assessment without the information, but you need to follow up the action and if necessary, review the assessment later. You can get lots of information on reports done from organisations' websites such as the Equality and Human Rights Commission, Stonewall, Press for Change, Joseph Rowntree Trust and so on. Please don't put down that the impact affects 'everyone the same' – it never does!

**6 From the information you have collected, how are you going to lessen any negative impact on any of the equality groups? How are you going to fill any gaps in information you have discovered?**

Specific actions and comments are set out in the mitigation sections of the equality group assessment tables above.

**Step 3 – deciding on the outcome**

**7 What outcome does this assessment suggest you take? – You might find more than one applies. Please also tell us why you have come to this decision?**

<b>Outcome 1</b>	<b>X</b>	<b>No major change needed</b> – the EIA hasn't identified any potential for discrimination or negative impact and all opportunities to advance equality have been taken
<b>Outcome 2</b>		<b>Adjust the policy</b> to remove barriers identified by the EIA or better advance equality. Are you satisfied that the proposed adjustments will remove the barriers you identified?

<b>Outcome 3</b>		<p><b>Continue the policy</b> despite potential for negative impact or missed opportunities to advance equality identified. You will need to make sure the EIA clearly sets out the justifications for continuing with it. You need to consider whether there are:</p> <ul style="list-style-type: none"> <li>• sufficient plans to stop or minimise the negative impact</li> <li>• mitigating actions for any remaining negative impacts</li> <li>• plans to monitor the actual impact.</li> </ul>
<b>Outcome 4</b>		<p><b>Stop and rethink</b> the policy when the EIA shows actual or potential unlawful discrimination</p>

Our Assessment team has agreed Outcome number(s)

The majority of the group agreed that no major change was needed to the overall proposals as actions have been identified to mitigate any potential implications identified by the assessment team.

Why did you come to this decision?

Where negative impacts were recorded, actions have been identified to mitigate the potential implications.

If you have decided on **Outcome 3**, then please tell us here the justification for continuing with the policy. You also need to make sure that there are actions in the Equality Action Plan to lessen the effect of the negative impact. This is really important and may face a legal challenge in the future.

If you have decided on **Outcome 4** then if the proposal continues, without any mitigating actions, it may be likely that we will face a legal challenge and possibly a Judicial Review on the process - it is really important that the equality impact assessment is done thoroughly, as this is what the Judge will consider.

## Step 4 – equality action plan – setting targets and monitoring

- 8 Fill in this table with the equality actions you have come up with during the assessment. Indicate how you plan to monitor the equality impact of the proposals, once they have been implemented.**

### Equality Action Plan –setting targets and monitoring

#### Age

What are we going to do to advance equality	What difference will it make	When will we do it and who will lead	Monitoring arrangements
<p>There are currently different SEND funding routes available for early years providers. The proposal is to bring together all of the funding in to a single pot which all early years providers can apply to for funding to support children with SEND.</p> <p>PVI nurseries are already provided with guidance on SEND and are sign-posted to training courses by STePS. The new graduated response guidance has been written to include guidance for all early years settings. Maintained settings will be offered training in the graduated response to support them to include children with SEND. The area SENCO team will continue to support PVI settings.</p>	<p>This would result in a fair, transparent and consistent funding route which would be available for all early years providers.</p> <p>Training and support to setting to help ensure they are able to meet the needs of children with SEND.</p>	<p>Subject to approval, the proposal is to implement a single Early Years Inclusion fund for all early years providers in Derby.</p> <p>Eleanor Moore</p>	<p>Annual reviews</p>

#### Disability

What are we going to do to advance equality	What difference will it make	When will we do it and who will lead	Monitoring arrangements
Support children, young	The proposals will help	Subject to	Annual reviews

What are we going to do to advance equality	What difference will it make	When will we do it and who will lead	Monitoring arrangements
<p>people and their families by ensuring that pupils with SEND are attending a school most appropriate to their individual needs.</p> <p>The individual needs of each pupil will be assessed through developing an Education Health and Care Plan. It is envisaged that high functioning pupils with autism would attend mainstream schools, with support, in the majority of cases.</p> <p>The purpose of the criteria is to provide a framework for placing pupils in the correct type of school to meet their individual needs. It will need to be made clear in any parents / carer communication that these are placement criteria, and not information on what schools are able to offer, which will usually be accessible to parents and carers on school websites.</p>	<p>to ensure that pupils are accessing the most appropriate settings based on their individual needs.</p>	<p>consultation and approval, the new criteria will be applied to future placements. Paula Nightingale</p>	
<p>Identify and address any gaps in provision, for example, Derby does not currently do not have specific specialist provision for pupils with social, emotional and mental health needs. There are proposals to introduce this provision.</p> <p>We've also considered the numbers of places available at each Enhanced Resource School and proposed changes so that places match with anticipated demand.</p>	<p>The proposals will help ensure that the needs of all pupils in Derby can be met in local schools, as appropriate.</p>	<p>Subject to consultation and approval, the new provision will be put in place. Paula Nightingale</p>	<p>Annual Reviews</p>

<b>What are we going to do to advance equality</b>	<b>What difference will it make</b>	<b>When will we do it and who will lead</b>	<b>Monitoring arrangements</b>
<p>Increase local school placements by ensuring that pupils are placed in the most appropriate settings based on their individual needs, accessing mainstream places where possible and appropriate.</p>	<p>This is likely to free up capacity in Special Schools and Enhanced Resource Schools, enabling them to take pupils that may otherwise be placed in distant placements.</p> <p>Local placements for children and young people with SEND are important in order to support the family and encourage the integration of young people in the local community, as part of preparation and transition planning to adulthood.</p>	<p>Subject to consultation and approval, the new criteria will be applied to future placements. Paula Nightingale</p>	<p>Annual Reviews</p>
<p>Improve SEND pupil pathways between infant, junior and secondary Enhanced Resource School placements.</p> <p>The proposals identify the secondary ER schools that pupils from each of the primary ER schools will usually transfer to. The numbers of places at each of the schools have been considered and changes proposed to ensure that secondary places align with primary places.</p>	<p>By creating pupil pathways between primary and secondary ER provision, it provides an early indication to the child and their parents of where the child is likely to access secondary provision.</p> <p>It will also enable more formal links to be created between primary and secondary ER school provision, including establishing outreach from secondary schools to primary schools to ensure that a pupils transition from primary to secondary</p>	<p>Subject to consultation and approval, the new pupil pathways will be implemented.  Paula Nightingale</p>	<p>Annual Reviews</p>

<b>What are we going to do to advance equality</b>	<b>What difference will it make</b>	<b>When will we do it and who will lead</b>	<b>Monitoring arrangements</b>
	education is as smooth as possible.		
Make investment Enhanced Resource School buildings. There are proposals to develop projects to invest in school buildings to increase and improve provision for children and young people with SEND.	There will be sufficient and appropriate classrooms and spaces for children and young people with SEND.	Subject to approval, timescales for opening new buildings will need to be carefully considered as the projects are developed. Gurmail Nizzer	Monitoring through Schools Capital Programme.

### **Gender identity - trans**

<b>What are we going to do to advance equality</b>	<b>What difference will it make</b>	<b>When will we do it and who will lead</b>	<b>Monitoring arrangements</b>
Trans children's needs will continue to be taken into account along with their impairment needs.	To ensure views are carefully considered when making placements or any other decisions about specialist provision.	This is already the case and it is important that this continues.	Annual Reviews

### **Marriage and Civil Partnership**

<b>What are we going to do to advance equality</b>	<b>What difference will it make</b>	<b>When will we do it and who will lead</b>	<b>Monitoring arrangements</b>
No impact identified for this equality group.			

## Pregnancy and maternity

<b>What are we going to do to advance equality</b>	<b>What difference will it make</b>	<b>When will we do it and who will lead</b>	<b>Monitoring arrangements</b>
Mainstream Schools will be formally reminded that they must spend their notional SEND funding on including children and young people with SEND. This may consist of wider staff training and professional development relating to teaching and supporting children with SEND, as well as training on the wellbeing of staff.	SEND notional funding to be specifically prioritised in mainstream schools for the benefit of children and young people with SEND and also to support staff in teaching pupils, accommodating needs as well as ensuring their own wellbeing.	Around the time that school budgets are issued.	On-going discussions with schools.

## Race

<b>What are we going to do to advance equality</b>	<b>What difference will it make</b>	<b>When will we do it and who will lead</b>	<b>Monitoring arrangements</b>
It's not clear whether the location of Enhanced Resource School provision does impact on race as any child with SEND might need to travel outside of their local community to attend an Enhanced Resource School or Special School. By increasing mainstream inclusion and local school places for children with SEND, it is likely to reduce school travel time for more pupils.	The aim is that higher numbers of pupils will be able to access local school placements. Local placements for children and young people with SEND are important in order to support the family and encourage the integration of young people in the local community, as part of preparation and transition planning to adulthood.	Subject to consultation and approval, the new criteria will be applied to future placements. Paula Nightingale	Annual Reviews

## Religion or belief or none

What are we going to do to advance equality	What difference will it make	When will we do it and who will lead	Monitoring arrangements
With regard to parents not wishing to send their child to a school with a particular ethos, the views of parents, carers and the child will be carefully considered when developing Education Health and Care Plans and making placements.	To ensure views on religion / ethos are carefully considered and taken account of in making placements.	Subject to consultation and approval, the new criteria will be applied to future placements.  Paula Nightingale	Annual reviews

## Sex

What are we going to do to advance equality	What difference will it make	When will we do it and who will lead	Monitoring arrangements
It's not clear whether redundancies will arise at this stage from the proposed re-allocation of nursery enhanced resource school funding to the Early Years Inclusion Fund. If any redundancies do arise, the Council will work together closely with the staff and nurseries and will follow all HR procedures.	To ensure that any staff redundancies, if they do arise, are treated in accordance with Council policies and that the nurseries are supported by the Council.	NA – It is unclear at this stage whether any staff redundancies will arise.	Continuing to work closely with the nurseries and understanding any staffing implications if the proposals are approved.

## Sexual orientation

What are we going to do to advance equality	What difference will it make	When will we do it and who will lead	Monitoring arrangements



<b>What are we going to do to advance equality</b>	<b>What difference will it make</b>	<b>When will we do it and who will lead</b>	<b>Monitoring arrangements</b>
No impact identified for this equality group.			

## The SEND Vision for Derby

### Derby Vision for SEND

We want children and young people with special educational needs and disabilities in Derby to...

Be happy,  
healthy and  
safe with good  
relationships

Be informed  
about the  
choices they  
have available

Feel involved  
in setting their  
own goals and  
types of  
support

Be able to  
access the  
right support  
at the right  
time

Live  
Independently  
and achieve  
their full  
potential

To achieve these outcomes, service providers and partners in Derby need to work differently. We will:

- Help to keep children local wherever possible
- Respond at the lowest level of need
- Be honest and fair about the decisions we make
- Deliver value for money

A word cloud of various phrases related to the SEND vision, including: Make decisions, Manage our money, Go out, Be healthy, Drive, Have friends, Be happy, Vote, Have healthy relationships, Have the right help at the right time, Live independently, Honesty, Fair treatment, Be listened to, Work together, Get education, Have holidays, and Know what is available to help us.

We can give you this information in any other way, style or language that will help you access it. Please contact us on: 01332 643722  
Minicom: 01332 640666

### Polish

Aby ułatwić Państwu dostęp do tych informacji, możemy je Państwu przekazać w innym formacie, stylu lub języku.

Prosimy o kontakt:

Tel. tekstowy: 01332 640666

### Punjabi

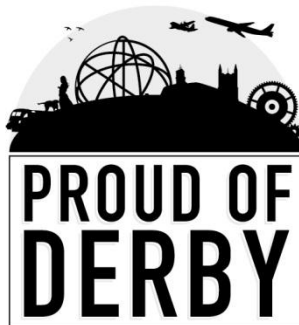
ਇਹ ਜਾਣਕਾਰੀ ਅਸੀਂ ਤੁਹਾਨੂੰ ਕਿਸੇ ਵੀ ਹੋਰ ਤਰੀਕੇ ਨਾਲ, ਕਿਸੇ ਵੀ ਹੋਰ ਰੂਪ ਜਾਂ ਬੋਲੀ ਵਿੱਚ ਦੇ ਸਕਦੇ ਹਾਂ, ਜਿਹੜੀ ਇਸ ਤੋਂ ਪਹਿਲਾਂ ਕਰਨ ਵਿੱਚ ਤੁਹਾਡੀ ਸਹਾਇਤਾ ਕਰ ਸਕਦੀ ਹੋਵੇ। ਕਿਰਪਾ ਕਰਕੇ ਸਾਡੇ ਨਾਲ ਟੈਲੀਫੋਨ ਸੰਪਰਕ 01332 640666 ਤੇ ਸੰਪਰਕ ਕਰੋ।

### Slovakian

Túto informáciu môžeme poskytnúť iným spôsobom, štýlom alebo v inom jazyku, ktorý vám pomôže k jej sprístupneniu. Skontaktujte nás prosím na tel.č: Minicom 01332 640666

### Urdu 01332 643722

یہ معلومات ہم آپ کو کسی دیگر ایسے طریقے، انداز اور زبان میں مہیا کر سکتے ہیں جو اس تک رسائی میں آپ کی مدد کرے۔ براہ کرم منی کام 01332 640666 پر ہم سے رابطہ کریں۔



Derby City Council