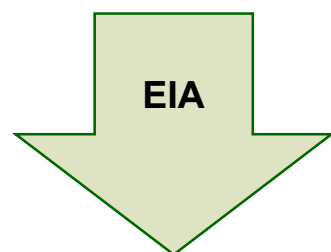


Warwickshire County Council (WCC) Equality Impact Assessment (EIA) Form

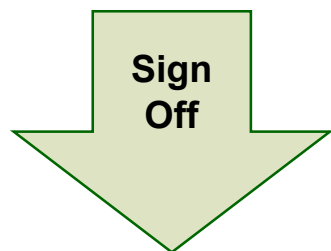
The purpose of an EIA is to ensure WCC is as inclusive as possible, both as a service deliverer and as an employer. It also demonstrates our compliance with Public Sector Equality Duty (PSED).

This document is a planning tool, designed to help you improve programmes of work by considering the implications for different groups of people. A guidance document is available [here](#).

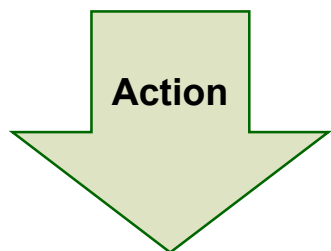
Please note that, once approved, this document will be made public, unless you have indicated that it contains sensitive information. Please ensure that the form is clear and easy to understand. If you would like any support or advice on completing this document, please contact the Equality, Diversity and Inclusion (EDI) team on 01926 412370 or via equalities@warwickshire.gov.uk, or if it's relating to health inequalities, please contact Ruby Dillon via rubydillon@warwickshire.gov.uk.



- Having identified an EIA is required, ensure that the EIA form is completed before any work is started. This includes gathering evidence and / or engaging the relevant stakeholders to inform your assessment.



- Brief the relevant Assistant Director for sign off and upload the completed form here: [Upload Completed Equality Impact Assessments](#). Please name it "EIA [project] [service area] [year]"
- Undertake further research / engagement to further understand impacts (if identified).
- Undertake engagement and / or consultation to understand if EIA has identified and considered impacts.
- Amend accordingly to engagement / consultation feedback and brief decision makers of any changes.



- Implement proposed activity.
- Monitor impacts and mitigations as evidence of duty of care.

Section One: Essential Information

Service / policy / strategy / practice / plan being assessed	SEND & Inclusion Services
Business Unit / Service Area	SEND & Inclusion in Education Services
Is this a new or existing service / policy / strategy / practice / plan? If existing, please state date of last assessment.	Existing service – last reviewed as part of the FOM in early 2020
EIA Authors N.B. It is best practice to have more than one person complete the EIA to bring different perspectives to the table.	Duane Chappell, Ross Caws, Linsey Edgeller, Morgan Howell,
Do any other Business Units / Service Areas need to be included?	Education Services, Children and families service, Adult social care
Does this EIA contain personal and / or sensitive information?	No
Are any of the outcomes from this assessment likely to result in complaints from existing services users, members of the public and / or employees?	If yes , please let your Assistant Director and the Customer Relations Team know as soon as possible.

	Yes
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1. Please explain the background to your proposed activity and the reasons for it.

In 2020, Warwickshire overspent on its Dedicated Schools Grant (DSG) by more than 1% of the total allocation and as a result was required to submit a DSG Recovery Plan to the Department for Education. The overspend was caused by expenditure in the High Needs Block which pays for Special Educational Needs and Disabilities (SEND) services. The Council agreed with Schools Forum, as part of the DSG Recovery Plan to carry out value for money reviews on all internal services provided by the County Council. These external reviews took place from Autumn 2020 to Spring 2022. Following these review the Council has developed proposals to confirm the SEND & Inclusion Service Offer.

2. Please outline your proposed activity including a summary of the main actions.

The following are being proposed:

- To design a new offer of service for SEND & Inclusion fit for formal Public Consultation
- To review the As Is and To Be Future Operating model for SEND & Inclusion to implement the new Service Offer
- To implement the new Operating Model to deliver the new offer of services

3. Who is this going to impact and how?

Customers	Members of the Public	Employees	Job Applicants
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<p>Schools and settings providing education to Warwickshire children and young people.</p> <p>Warwickshire's Parents/ Carers.</p> <p>Children and Young people with SEND.</p>	<p>Warwickshire's Parents/ Carers.</p> <p>Children and Young people with SEND</p>	<p>SEND & Inclusion staff.</p> <p>WCC staff.</p>	n/a
Other, please specify:	Other SEN Practitioners working in Warwickshire.		

Section Two: Evidence

Please include any evidence or relevant information that has influenced the decisions contained in this EIA. This could include demographic profiles; audits; research; health needs assessments; national guidance or legislative requirements and how this relates to the protected characteristic groups and additional groups outlined in Section Four.

A – Quantitative Evidence

This is evidence which is numerical and should include the number people who use the service and the number of people from the protected characteristic groups who might be affected by changes to the service.

The data available listed below enables the Project to:

- identify groups protected by the Equality Act (2010),
- identify groups (stakeholders) and underrepresented groups impacted by Programme and project changes,
- provide focus areas for consultation, engagement, and communication.

1) Equality Data

[01 SEND Equality Data Dec21.xlsx](#)

Total SEN Support children: 10,650 - 3855 (36%) are Girls and 6795 (64%) are Boys.

	Children and Young People with an Education Health and Care Plan (EHCP)	Children and young people with SEN Support
Data source	Synergy	School Census
Age	Data available	Data available
Disability	Data available	Data available
Sex	Data available	Data available
Race	Data available	Data available
Gender reassignment	Data not easily available to report on. If gender is changed legally, changes are made to records in Synergy, but only if it is official. Records are changed, but a note made in the notes section. Notes are kept if genders have changed but not officially e.g. known by this name or prefers to be referred to as this gender	Data not collected
Religion or belief	Data not held yet. There is a religion field in Synergy, however it is not actively maintained. Processes are in place for maintaining the child's attendance and address then plans are to move to reviewing ethnicity and religion. This dataset cannot be relied upon at the moment but perhaps in the future.	Data not collected
Marriage and civil partnership	Data not held	Data not collected
Pregnancy and maternity	Data not held - There is a field for this in Synergy but it is not used	Data not collected
Sexual orientation	Data not held	Data not collected

1. Age

EHCP Population				SEN Support Population			
Year Group	Girls	Boys	Total	Year Group	Girls	Boys	Total
Nursery	7	7	14	Nursery	62	127	189
Reception	38	108	146	Reception	141	359	500
NC Year 01	44	126	170	NC Year 01	234	495	729
NC Year 02	36	129	165	NC Year 02	243	557	800
NC Year 03	46	164	210	NC Year 03	336	604	940
NC Year 04	73	173	246	NC Year 04	330	626	956
NC Year 05	70	179	249	NC Year 05	366	661	1027
NC Year 06	72	227	299	NC Year 06	362	581	943
NC Year 07	84	211	295	NC Year 07	386	637	1023
NC Year 08	87	218	305	NC Year 08	327	550	877
NC Year 09	76	212	288	NC Year 09	320	529	849
NC Year 10	94	242	336	NC Year 10	291	448	739
NC Year 11	89	216	305	NC Year 11	287	431	718
NC Year 12	100	239	339	NC Year 12	76	110	186
NC Year 13	76	226	302	NC Year 13	93	80	173
NC Year 14	91	196	287	NC Year 14	*	*	*
NC Year 15	64	168	232	Total	3855	6795	10650
NC Year 16	59	121	180				
NC Year 17	46	88	134				
NC Year 18	39	84	123				
NC Year 19	11	40	51				
NC Year 20	14	25	39				

NC Year 21	*	8	**
NC Year 22	*	*	*
Total	1318	3407	4725

* Value is less than 5

2. Disability of Children

EHCP Population			
Special Need	Girls	Boys	Total
Autistic Spectrum Disorder (inc. Asperger's Syndrome)	351	1247	1598
Hearing Impairment	28	26	54
Moderate Learning Difficulty	183	319	502
Multi-Sensory Impairment	5	6	11
Other Difficulty/Disability	46	80	126
Physical Difficulties	81	110	191
Profound and Multiple Learning Difficulties	26	31	57
SEN support but no specialist assessment of type of need	*	*	**
Severe Learning Difficulty	72	133	205
Social, Emotional and Mental Health	284	850	1134
Specific Learning Difficulty	22	46	68
Speech, Language and Communication Needs	195	521	716
To be identified	*	*	*
Visual Impairment	21	32	53
Total	1318	3407	4725

SEN Support Population			
Special Need	Girls	Boys	Total
Autistic Spectrum Disorder (inc. Asperger's Syndrome)	213	638	851
Hearing Impairment	79	62	141
Moderate Learning Difficulty	1153	1607	2760
Multi-Sensory Impairment	9	25	34
Other Difficulty/Disability	133	213	346
Physical Difficulties	112	161	273
Profound and Multiple Learning Difficulties	*	*	**
SEN support but no specialist assessment of type of need	77	149	226
Severe Learning Difficulty	5	17	22
Social, Emotional and Mental Health	656	1429	2085
Specific Learning Difficulty	502	752	1254
Speech, Language and Communication Needs	511	1205	1716
To be identified	361	469	830
Visual Impairment	42	65	107
Total	3855	6795	10650

* Value is less than 5

3. Race

EHCP Population			
Ethnic Group	Girls	Boys	Total
Any Other Ethnic Group	*	26	**
Asian - Any Other Asian Background	8	33	41
Asian - Bangladeshi	*	*	*
Asian - Indian	21	79	100
Asian - Pakistani	7	18	25
Black - Any Other Black Background	*	16	**
Black - Black - African	10	24	34
Black - Black Caribbean	*	10	**
Chinese	*	*	*
Information Not Yet Obtained	95	270	365
Mixed - Any Other Mixed Background	20	49	69
Mixed - White and Asian	10	32	42
Mixed - White and Black African	*	18	**
Mixed - White and Black Caribbean	17	49	66
Refused	*	10	**

SEN Support Population			
Ethnic Group	Girls	Boys	Total
Asian - Any other Asian background	18	40	58
Asian - Bangladeshi	38	45	83
Asian - Indian	*	10	**
Asian - Pakistani	71	127	198
Black - Any other Black background	10	24	34
Black - Black African	5	9	14
Black - Black Caribbean	22	53	75
Chinese	*	15	**
Information Not Yet Obtained	6	5	11
Mixed - Any other Mixed background	76	121	197
Mixed - White and Asian	65	118	183
Mixed - White and Black African	39	72	111
Mixed - White and Black Caribbean	15	49	64
Refused	59	96	155
White - Any other White background	17	40	57

White - Any Other White Background	40	110	150		White - Gypsy/Roma	151	301	452
White - Gypsy / Roma	*	9	**		White - Irish	13	19	32
White - Irish	*	11	**		White - Traveller of Irish heritage	8	23	31
White - Traveller of Irish Heritage	*	6	**		White - White British	5	8	13
White - White British	1064	2631	3695		Total	3232	5620	8852
Grand Total	1318	3407	4725		Grand Total	3855	6795	10650

* Value is less than 5

**Value removed due to data identification purposes

2) **Local Area SEND Inspection Data Dashboard** [Data Dashboard - Local Area SEND Inspection Jan2022.pdf](#)

3) **Specific Gypsy Romany Traveler (GRT) statistics** [GRT Spring 22 - SEND V2 \(2\).xlsx](#)

Below is the number and percentage of GRT CYP with EHCP and SEND Support

SEN Status	No' of pupils	
No SEND (N)	168	73.4%
SEN Support (K)	49	21.4%
EHCP (E)	<u>12</u>	5.2%
	229	

The document also shares a list of:

- Warwickshire schools with the highest representation of GRT Children and Young People
- Gender data
- Disability Primary and Secondary Need

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B – Qualitative Evidence

This is data which describes the effect or impact of a change on a group of people, e.g. some information provided as part of performance reporting.

https://councilfordisabledchildren.org.uk/sites/default/files/uploads/files/Lenehan_Review_Report_0.pdf

https://councilfordisabledchildren.org.uk/sites/default/files/uploads/attachments/Lessons%20Learnt%20From%20Lockdown_0.pdf

The above two links provide qualitative information that provides context for the potential impact on those children/young people with SEND.

Section Three: Engagement

Engagement with individuals or organisations affected by the proposed activity must take place. For further advice and support with engagement and consultations, click [here](#).

Has the proposed activity been subject to engagement or consultation with those it's going to impact, taking into account their protected characteristics and socio-economic status?	Yes
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If YES, please state who with.	<ul style="list-style-type: none"> • SEND & Inclusion staff • WCC staff • Schools and settings providing education to Warwickshire children and young people • Warwickshire's Parents/ Carers • Warwickshire Parent Carer Voice • Warwickshire's SEN Practitioners • Children and Young people (represented by the youth group IMPACT) • Seldom heard group representing; <ul style="list-style-type: none"> ○ Armed forces ○ Gypsy Roma Traveler communities ○ Faith communities ○ LGBTQ+ 	
If NO engagement has been conducted, please state why.		
How was the engagement carried out?	Yes / No	What were the results from the engagement? Please list...
Focus Groups	Yes	The overall key messages from pre-consultation engagement were: <ul style="list-style-type: none"> • The proposed changes to the SEND & Inclusion core offer are welcomed by the majority of those who were engaged with. • There was concern over the capacity available to deliver the proposed changes.

		<ul style="list-style-type: none"> • There was a request for more detail on the core offer than was provided during the engagement events. • Large amount of support for the proposed move to a geographical (area) operating model, with support being centred around the child/education setting. • This was echoed in the backing for the multi-disciplinary model of working, with collaborative support provided from WCC and partner agencies.
Surveys	Yes	<ul style="list-style-type: none"> • Results from a survey with parents/carers re: the Educational Psychology Service: Parents/carers survey results • Results from a survey with schools re: the Educational Psychology Service: Schools survey results
Public Event	No	
Displays / Exhibitions	No	
Other (please specify)		
Has the proposed activity changed as a result of the engagement?		Yes
Have the results of the engagement been fed back to the consultees?	Ongoing	Reported back to staff and the WPCV.

Is further engagement or consultation recommended or planned?		Yes, a public consultation on the proposed changes to the SEND & Inclusion service offer.
What process have you got in place to review and evaluate?	The information/ results will be collated and analysed by WCC internal business intelligence team.	

Section Four: Assessing the Impact

Protected Characteristics and other groups that experience greater inequalities

What will the impact of implementing this proposal be on people who share characteristics protected by the Equality Act 2010 or are likely to be affected by the proposed activity? This section also allows you to consider other impacts, e.g. health inequalities such as deprivation, socio-economic status, vulnerable groups such as individuals who suffer socio-economic disadvantage, armed forces, carers, homelessness, people leaving prison, young people leaving care etc.

On the basis of evidence, has the potential impact of the proposed activity been judged to be positive (+), neutral (=), negative (-), or positive and negative (+&-), for each of the protected characteristic groups below and in what way?

N.B In our Guidance to EIAs we have provided you with potential questions to ask yourself when considering the impact of your proposed activity. Think about what actions you might take to mitigate / remove the negative impacts and maximize on the positive ones. This will form part of your action plan at Section Six.

	Impact type (+) (=) (-) or (+&-)	Nature of impact
Age	+	Ensures services deliver from 0-25 years. Provide an integrated service offer for CYP and their families. Provide increased early intervention. Clear core offer and traded offer for education settings.
Disability Consider: <ul style="list-style-type: none"> Physical disabilities Sensory impairments Neurodiverse conditions (e.g. dyslexia) Mental health conditions (e.g. depression) Medical conditions (e.g. diabetes) 	+	<p>The SEND & Inclusion service offer is based on inclusion through earlier identification and response to SEND.</p> <p>The intention is that by changing current practice, the incentives in the system should support early identification and intervention. This should lead to more children being educated in mainstream or state-funded specialist settings, closer to home and with their peers. As a result needs should be managed earlier, avoiding escalation, and avoiding higher costs.</p> <p>The evidence for inclusion in mainstream settings is set out in the Warwickshire SEND & Inclusion Strategy 2019-2023.</p> <p>The proposed model of working will streamline services and provide clearer access to services.</p> <p>Enabling model for the workforce to upskill in terms of knowledge and understanding of SEND.</p>
Gender Reassignment	=	No known impact, data is not gathered. This is an area for future develop and monitoring.

Marriage and Civil Partnership	=	No known impact, data is not gathered.
Pregnancy and Maternity	=	No known impact, data is not gathered.
Race Including: <ul style="list-style-type: none"> • Colour • Nationality • Citizenship • Ethnic or national origins 	+&-	Drawing conclusions from the data has significant limitations, particularly due to missing data on ethnicity for those with EHCPs. In terms of academic achievement across education services, children from Gypsy Roma communities and mixed white and black Caribbean ethnicity are known to perform lower than their peers. The impact of SEN on this is not known. The proposals for the SEND service offer will be available to all groups. Engagement is to continue with seldom heard families, including Gypsy Roma Traveler. There is also work ongoing in education services to proactively support those from disadvantaged backgrounds.
Religion or Belief	=	No known impact, data is not gathered.
Sex	+&-	Higher proportion of boys with identified SEND needs (over 70% of CYP with a EHCP are male) so any change could impact them more than girls. Total SEN Support children: 10,650 - 3855 (36%) are Girls and 6795 (64%) are Boys. This is in keeping with statistical, regional and national statistics.
Sexual Orientation	=	No known impact, data is not gathered.
Vulnerable People: <ul style="list-style-type: none"> • Individuals who suffer socio-economic disadvantage • Armed Forces (WCC signed the Armed Forces Covenant in June 2012) • Carers • Homelessness 	=	<p>The impact on vulnerable groups is not yet known. In order to understand the impact, engagement is taking place with representatives from these groups and a focus on hearing the voice of these groups will be prioritised during the public consultation.</p> <p>There is also work ongoing in education services to proactively support those from disadvantaged backgrounds.</p> <p>The SEND code of practice makes specific provision for children from families in the armed forces as well as other vulnerable groups including children in care and</p>

<ul style="list-style-type: none"> • People leaving Prison • People leaving Care 		children in the youth justice system. The council is committed to implementing the SEN code of practice.
Health Inequalities (HI) Many issues can have an impact on health: is it an area of deprivation, does every population group have equal access, unemployment, work conditions, education, skills, our living situation, rural, urban, rates of crime etc	=	The council service offer excludes services commissioned by the integrated care board. However, in business as usual activity, the council and integrated care board continue to commission health services for children / young people both with and without EHCPs through the continued local area service offer. These include a range of community services supporting children / young people from 0-25 years, including but not limited to community paediatricians, community nursing and community therapies and community mental health services.
Other Groups If there are any other groups		

Public Sector Equality Duty (PSED)

Public Authorities must have 'due regard' to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations. Please evidence how your proposed activity meets our obligations under the PSED.

	Evidence of Due Regard
Eliminate unlawful discrimination (harassment, victimisation and other prohibited conduct):	The project is helping to promote the needs of children and young people and with SEND by working with schools and community groups are engaged to share their views.
Advance equality of opportunity: This involves <ul style="list-style-type: none"> • removing or minimising disadvantages suffered by people due to their protected characteristics; 	The proposal is about providing a clear transparent operating model that is sustainable. By providing this it will enable SEND & Inclusion to deliver services to those children/young people who have protected characteristics within their local community (as their peers receive). By engaging and consulting with the public prior to making any changes, this

<ul style="list-style-type: none"> taking steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people, for example, taking steps to take account of people with disabilities; encouraging people with certain protected characteristics to participate in public life or in other activities where their participation is disproportionately low. 	<p>will ensure the voice of the local community is heard and taken into account.</p> <p>The proposed changes to the service offer are focused on increasing support for children / young people without EHCPs, to ensure early identification and intervention.</p>
<p>Foster good relations:</p> <p>This means tackling prejudice and promoting understanding between people from different groups and communities.</p>	<p>In order to develop a new operating model, we will be engaging with stakeholders prior to, and during the consultation around the proposed service offer changes. By ensuring the service offer is refined we will then re-design the operating model to deliver this effectively to education settings and the children/young people of Warwickshire.</p>

Section Five: Partners / Stakeholders

Which sectors are likely to have an interest in or be affected by the proposed activity?	Yes / No	Describe the interest / affect
Businesses	No	
Councils	No	
Education Sector	Yes	Education settings have statutory duties and the local authority will support them in discharging these duties.

Fire and Rescue	No	
Governance Structures	No	
NHS	Yes	Continued commitment to work with the NHS in order to provide holistic support to children and families in response to rising demand.
Police	No	
Voluntary and Community Sector	No	
Other(s): please list and describe the nature of the relationship / impact		

Section Six: Action Planning

If you have identified impacts on protected characteristic groups in Section Four please summarise these in the table below detailing the actions you are taking to mitigate or support this impact. If you are not taking any action to support or mitigate the impact you should complete the No Mitigating Actions section below instead.

Mitigating Actions

Consider:

- Who else do you need to talk to? Do you need to engage or consult?
- How you will ensure your activity is clearly communicated
- Whether you could mitigate any negative impacts or build on positive impacts for protected groups or health inequalities
- Whether you could do more to fulfil the aims of the PSED
- How you will monitor and evaluate the effect of this work
- Anything else you can think of!

Identified Impact	Action(s)	Timescale incl. evaluation and review date	Name of person responsible
Impact of proposed change to SEND service offer.	Public consultation and analysis <ul style="list-style-type: none"> • online – Ask Warwickshire • paper version 	Consultation is live between Dec 2022 – Feb 2023. Analysis will take place in Feb and March 2023.	Duane Chappell
Impact of proposed change to SEND service offer accessible all.	Easy read version of consultation paperwork and supporting documentation.	Consultation is live between Dec 2022 – Feb 2023. Analysis will take place in Feb and March 2023.	Lisa Mowe
Impact of proposed change to SEND service offer accessible all.	Consultation information and supporting documentation available in different languages.	Consultation is live between Dec 2022 – Feb 2023. Analysis will take place in Feb and March 2023.	
	Face to face drop in sessions	Consultation is live between Dec 2022 – Feb 2023.	Ross Caws
	Online drop in sessions	Consultation is live between Dec 2022 – Feb 2023.	Ross Caws

No Mitigating Actions

Please explain why you do not need to take any action to mitigate or support the impact of your proposed activity.

n/a

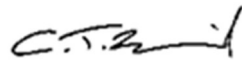
Section Seven: Assessment Outcome

Only one of following statements best matches your assessment of this proposed activity. Please select one and provide your reasons.

No major change required		
The proposal has to be adjusted to reduce impact on protected characteristic groups and/or health inequalities		
Continue with the proposal but it is not possible to remove all the risk to protected characteristic groups and/or health inequalities	X	
Stop the proposal as it is potentially in breach of equality legislation		

Section Eight: Sign Off

N.B To be completed after the EIA is completed but before the area of work commences.

Name of person/s completing EIA	Ross Caws, Linsey Edgeller, Duane Chappell
Name and signature of Assistant Director	
Date	2 nd Deember 2022
Date of next review and name of person/s responsible	

Once signed off, please ensure the EIA is uploaded using the following form.
Please name it “EIA [project] [service area] [year]”: [Upload Completed Equality Impact Assessments](#)

These will be stored on a [Sharepoint library](#) which WCC colleagues can access.