



Agenda for a meeting of the Executive to be held on Tuesday, 3 April 2018 at 10.30 am in Committee Room 1 - City Hall, Bradford

Members of the Executive – Councillors

LABOUR
Hinchcliffe (Chair)
V Slater
I Khan
Ross-Shaw
Ferriby
Jabar

Notes:

- This agenda can be made available in Braille, large print or tape format on request by contacting the Agenda contact shown below.
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- If any further information is required about any item on this agenda, please contact the officer named at the foot of that agenda item.

From:

Michael Bowness
Interim City Solicitor
Agenda Contact: Jill Bell
Phone: 01274 434580/4579
E-Mail: jill.bell@bradford.gov.uk

To:

A. PROCEDURAL ITEMS

1. DISCLOSURES OF INTEREST

(Members Code of Conduct - Part 4A of the Constitution)

To receive disclosures of interests from members and co-opted members on matters to be considered at the meeting. The disclosure must include the nature of the interest.

An interest must also be disclosed in the meeting when it becomes apparent to the member during the meeting.

Notes:

- (1) Members may remain in the meeting and take part fully in discussion and voting unless the interest is a disclosable pecuniary interest or an interest which the Member feels would call into question their compliance with the wider principles set out in the Code of Conduct. Disclosable pecuniary interests relate to the Member concerned or their spouse/partner.*
- (2) Members in arrears of Council Tax by more than two months must not vote in decisions on, or which might affect, budget calculations, and must disclose at the meeting that this restriction applies to them. A failure to comply with these requirements is a criminal offence under section 106 of the Local Government Finance Act 1992.*
- (3) Members are also welcome to disclose interests which are not disclosable pecuniary interests but which they consider should be made in the interest of clarity.*
- (4) Officers must disclose interests in accordance with Council Standing Order 44.*

2. MINUTES

Recommended –

That the minutes of the meeting held on 20 February and 6 March 2018 be signed as a correct record (previously circulated).

(Jill Bell - 01274 434580)

3. INSPECTION OF REPORTS AND BACKGROUND PAPERS

(Access to Information Procedure Rules – Part 3B of the Constitution)

Reports and background papers for agenda items may be inspected by

contacting the person shown after each agenda item. Certain reports and background papers may be restricted.

Any request to remove the restriction on a report or background paper should be made to the relevant Strategic Director or Assistant Director whose name is shown on the front page of the report.

If that request is refused, there is a right of appeal to this meeting.

Please contact the officer shown below in advance of the meeting if you wish to appeal.

(Jill Bell - 01274 434580)

4. **RECOMMENDATIONS TO THE EXECUTIVE**

To note any recommendations to the Executive that may be the subject of report to a future meeting. (Schedule to be tabled at the meeting).

(Jill Bell - 01274 434580)

A. PORTFOLIO ITEMS

HEALTH & WELLBEING PORTFOLIO
(Councillor Val Slater)

5. **0-19 PREVENTION AND EARLY HELP**

1 - 98

On 7 November 2017 the Executive considered a report of the Strategic Director of Children's Services that outlined the proposal to create a new 0-19 Prevention and Early Help service which would work across the District. This new service would bring together a range of existing services to form a new set of preventative arrangements for children, young people and families. By working in a more coordinated way with partners and communities, the new arrangements would deliver more effective and efficient ways of whole family and community based working.

The Council held extensive public consultation on a proposed preferred model between 15 November 2017 and 12 February 2018. Peopletoo were commissioned to provide an independent analysis of the consultation feedback.

The report of the Strategic Director of Children's Services (**Document "BI"**) sets out the Council's final Family Hub model taking on board some changes arising from the consultation feedback.

Executive is asked to approve this Family Hub model taking into account the analysis of the public consultation, changes made to

increase front-line delivery and an updated Equalities Impact Assessment.

Recommended -

- (1) That the Executive, approves the Family Hub model of co-produced service delivery for prevention and early help and to the implementation of this model as per the timeline set out in Document “BI”.
- (2) That Executive agrees to the Strategic Director of Children’s, in consultation with the Portfolio Holder, producing a detailed plan on the best collective use of buildings across the Council, key partners and communities so we can sustain as much funding into frontline workers by 2020/21 which would be subject to further consultation as required.

(Judith Kirk – 01274 431078)

**EDUCATION, EMPLOYMENT & SKILLS
PORTFOLIO & DEPUTY LEADER**

(Councillor I Khan)

6. FINAL PROPOSALS FOR THE RESTRUCTURE OF SEND SPECIALIST TEACHING SUPPORT SERVICES FOR CHILDREN AND YOUNG PEOPLE WITH SEND

99 - 156

The report of the Strategic Director of Children’s Services (**Document “BJ”**) requestes the Executive to approve the final model for transforming the SEND Specialist Teaching Support Services taking into account the analysis of consultation representations, an updated Equality Impact Assessment (EIA) and SEN Improvement Test.

Recommended –

That the Executive having considered the consultation responses (Appendix 3) and the Equalities Impact Assessment (Appendix 4) and SEN Improvement Test (Appendix 2) approves the proposed model to restructure SEND Specialist Teaching Support Services into one 0-25 Inclusive Education Service to include two teams supporting high occurring special needs and low occurring special needs children and young people, and agrees to the implementation of this model as per the timeline set out in Document “BJ”.

(Judith Kirk – 01274 439255)

7. ENSURING THE SUFFICIENCY OF SPECIALIST PLACES FOR CHILDREN AND YOUNG PEOPLE WITH SPECIAL EDUCATIONAL NEEDS AND DISABILITIES (SEND) ACROSS THE DISTRICT

157 -
372

The report of the Strategic Director of Children's Services (**Document "BK"**) asks the Executive to approve:

The outlined short term special school proposals for 116 Additional proposed maintained special school places

The outlined permanent Designated Specialist Provision (DSP) proposals for 54 Additional proposed Designated Specialist Provision (DSP) places in maintained schools

The outlined permanent Early Years Enhanced Specialist Provision (EYESP) proposals for 28 Additional proposed 0.6 Early Years Enhanced Specialist Provision (EYESP) places

Recommended -

- (1) It is recommended that the Executive:**
- (2) Approve the proposal to increase the number of places for pupils at Chellow Heights Special School by increasing the pupil numbers from 200 to 248 with effect from 16 April 2018 onwards (subject to the proposed capital building programme and the granting of planning permission)**
- (3) Approve the proposal to increase the number of places for pupils at Delius Special School by increasing the pupil numbers from 124 to 148 with effect from 1 September 2018 onwards (subject to the proposed capital building programme and the granting of planning permission)**
- (4) Approve the proposal to increase the number of places for pupils at Beechcliffe Special School by increasing the pupil numbers from 114 to 144 with effect from 16 April 2018 onwards (subject to the proposed capital building programme and permissions)**
- (5) Approve the proposal to increase the number of places for pupils at Oastlers School by increasing the pupil numbers from 80 to 94 with effect from 16 April 2018 onwards**
- (6) Approve the proposal to establish DSP at Crossley Hall Primary School with up to 12 places for primary aged children and young people with communication and interaction needs including autistic spectrum disorders (ASD) with effect from 1 September 2018 onwards**

- (7) Approve the proposal to increase the existing DSP at Crossflatts Primary School for primary aged children and young people with communication and interaction needs including autistic spectrum disorders (ASD) from 12 places to 16 places, with effect from 16 April 2018 onwards**
- (8) Approve the proposal to increase the existing DSP at The Holy Family Catholic School for secondary aged children and young people with communication and interaction needs including autistic spectrum disorders (ASD) from 12 places to 16 places, with effect from 16 April 2018 onwards**
- (9) Approve the proposal to increase the existing DSP at Titus Salt School for secondary aged children and young people with cognition and learning needs from 16 places to 30 places, with effect from 16 April 2018 onwards (subject to the proposed capital building programme and the granting of planning permission)**
- (10) Approve the proposal to establish DSP at Long Lee Primary School with up to 10 places for primary aged children and young people with social emotional and mental health needs (SEMH) with effect from 16 April 2018 onwards (subject to the proposed capital building programme)**
- (11) Approve the proposal to establish DSP at Cottingley Village Primary School with up to 10 places for primary aged children and young people with social emotional and mental health needs (SEMH) with effect from 16 April 2018 onwards (subject to the proposed capital building programme)**
- (12) Approve the proposal to increase the number of EYESP places at Strong Close Nursery School for early years aged children from 23 to 30 x 0.6 part time places, with effect from 16 April 2018 onwards (subject to the proposed capital building programme and planning permission)**
- (13) Approve the proposal to increase the number of EYESP places at St Edmunds Nursery School for early years aged children from 26 to 33 x 0.6 part time places, with effect from 16 April 2018 onwards**
- (14) Approve the proposal to increase the number of EYESP places at Canterbury Nursery School for early years aged children from 21 to 28 x 0.6 part time places, with effect from 16 April 2018 onwards (subject to the proposed capital building programme)**

- (15) **Approve the proposal to formally establish 20 x part time 0.6 place EYESP at Abbey Green Nursery School for early years aged children with effect from 16 April 2018 onwards (subject to the proposed capital building programme)**

(Judith Kirk – 01274 439255)

B. STRATEGIC ITEMS

<p style="text-align: center;">LEADER OF COUNCIL & CORPORATE</p>

<p style="text-align: center;"><i>(Councillor Hinchcliffe)</i></p>
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8. QUARTER 4 FINANCE POSITION STATEMENT FOR 2017-18

373 -
414

The report of the Assistant Director of Finance (**Document “BL”**) provides Members with an overview of the forecast financial position of the Council for 2017-18.

It examines the latest spend against revenue and capital budgets and forecasts the financial position at the year end. It states the Council's current balances and reserves and forecasts school balances for the year.

Recommended -

- (1) That the Executive note the contents of Document “BL” and the actions to be taken to manage the closure of the Council's financial position for 2017-18.**
- (2) That in preparing the Final Accounts the Assistant Director Finance & Procurement be authorised to take appropriate steps to secure the best advantage for the Council's financial position.**

(Andrew Cross – 01274 436823)

9. C PORTFOLIO ITEMS

**REGENERATION, PLANNING & TRANSPORT
PORTFOLIO**

(Councillor Ross-Shaw)

10. HIGHWAY POLICY DOCUMENTS

415 -
448

The report of the Strategic Director of Place (**Document “BM”**) details revised policies and procedures that are to be adopted by the Network Resilience and Management Team in relation to Highway Enforcement and Operational Matters from 1st April 2018

Recommended –

- (1) That Executive approves the initial Highway Enforcement Policy Documents with effect from the proposed implementation date of 1st April 2018
- (2) That responsibility for the determination and adoption of additional future enforcement policies and the alteration/adaptation of previously approved policies is delegated to the Strategic Director of Place, in consultation with the Portfolio Holder for Regeneration, Planning and Transport and the City Solicitor.

(Darren Badrock - 01274 437420)

11. REVIEW AND MODIFICATION OF BRADFORD'S
IMPLEMENTATION OF THE YORKSHIRE COMMON PERMIT
SCHEME

449 -
486

The report of the Strategic Director of Place (**Document “BN”**) sets out changes in the Department for Transport's approach to Street Works and seeks Executive's approval to modify the existing permit scheme in order to adopt an all streets scheme.

Recommended -

- (1) That the Strategic Director of Place, in consultation with the Portfolio Holder for Regeneration, Housing, Planning and Transport, be given delegated authority:
 - a. To consult all relevant stakeholders, including local Ward Councillors, in relation to the arrangements for the implementation of an All Street Permit Scheme in the Bradford District.

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Report of the Strategic Director Children's Services to the meeting of Executive to be held on 3 April 2018

BI

Subject

Prevention and Early Help – a proposed new model to support families and communities for the future, including proposed changes to how we provide the children's centre core offer across the District and an update on Public Health 0-19 Children's Services.

Summary statement

This paper follows the Executive meeting held on 7 November 2017. At that meeting, members agreed:

- a. That in light of government cuts, local outcomes and increasing demand to accept Option 3 as the option for consultation;
- b. That the Strategic Director for Children's Services be authorised to commence formal consultation from 15 November 2017 until 12 February 2018;
- c. That Executive receives a further report in April 2018 following formal consultation.

The paper presented at the Executive meeting in November outlined the proposal to create a new 0-19 Prevention and Early Help service which would work across the District. This new service would bring together a range of existing services to form a new set of preventative arrangements for children, young people and families. By working in a more coordinated way with partners and communities, the new arrangements would deliver more effective and efficient ways of whole family and community based working.

The Council is facing unprecedented pressure and cuts on its budgets whilst the demand and costs for services are rising. Funding cuts will mean that the resources we will have to spend on Prevention and Early Help for children and young people will reduce by £13.3m or more than one third, from £37.1m in 2016/17 to £23.8m in 2020. These cuts are in addition to the ones the Council has already had to make. In 2013/14, the government gave Bradford a core grant of £183 million to fund local services across the district. By 2020, they will have cut that to zero. Every resident has been affected in one way or another, wherever they live.

The Council held extensive public consultation on a proposed preferred model between 15 November 2017 and 12 February 2018. Peopletoo were commissioned to provide an independent analysis of the consultation feedback.

This report sets out the Council's final Family Hub model taking on board some changes arising from the consultation feedback.

Executive is asked to approve this Family Hub model taking into account the analysis of the public consultation, changes made to increase front-line delivery and an updated Equalities Impact Assessment.

<p>Michael Jameson Strategic Director</p>	<p>Portfolio: Education, Employment and Skills</p>
<p>Report Contact: Judith Kirk, Deputy Director Phone: (01274) 431078 Email: Judith.kirk@bradford.gov.uk</p>	<p>Overview & Scrutiny Area: Children's Services</p>

1. SUMMARY

- 1.1 At the Executive meeting held on 7 November 2017, Members approved a 12 week formal consultation commencing on 15 November 2017 until 12 February 2018 on a preferred proposed prevention and early help delivery model. Executive agreed to receive a further report in April 2018 following the formal consultation.
- 1.2 This report focuses on:
- the outcome of the public consultation;
 - the proposal for a new 0-19 Prevention and Early Help Service including future delivery of a 'whole family' offer for babies, children, young people and families through Family Hubs.
- 1.3 The Council has considered, values, appreciates and has listened to feedback from consultation.
- 1.4 The proposed model new Family Hubs model, lead by four Area Partnerships and the four 0-19 area teams, will provide:
- Co-ordination and an information network across universal and targeted support in a cluster area;
 - Focused work which builds family relationships and improves children's outcomes (see Prevention and Early Help outcomes framework at Appendix 1);
 - Reduced family poverty and support social mobility;
 - Co-location of key teams, particularly with the 0-19 public health service.
- 1.5 We genuinely want and need to plan and deliver support at a district and local level which is based on the strengths and assets within families and their local communities.
- 1.6 We can collectively build up this model as and when additional investment becomes available. We believe this is the best model to minimise risk to those in crisis whilst managing to continue some prevention activity which requires our communities working with us and doing some of this themselves.

REVISED PROPOSAL AND STEPS TO 2020

- 1.7 **It is recommended to progress with the preferred model as consulted but with the following changes which will provide 0-19 (25 for young people with SEND) Family Hubs:**
- Stronger focus on developing Family Hubs and closer working with schools, primary care groups and local communities in line with the direction set out by the Health and Wellbeing Board;
 - At the meeting on the 20 February 2018, Executive agreed an additional 500K per year for 2018/19 and 2019/20 to support transition into the proposed new model. This additional funding has all gone into increasing the number of Prevention Workers and Key Workers;

- Increase the proposed workforce from 197 FTE to 246.5 FTE by 49.5 FTE (Delivery framework and staffing structures can be found at Appendix 2);
- Reductions in management and an increase in the number of posts working directly with families and communities;
- Retain a dedicated service within Education Services focused on safeguarding and improving the education of vulnerable pupils;
- Retain the focus on New Communities and Travellers (within Education Safeguarding);
- Produce a detailed plan on the best collective use of buildings across the Council, key partners and communities so we can sustain as much funding into frontline workers by 2020/21 which would be subject to further consultation as required;
- Farcliffe and Lilycroft Children Centre will remain unchanged (Overview of children centre buildings can be found at Appendix 3). We would implement proposals to redesignate seven of the proposed eight children's centre buildings to become outreach bases.
- Ensure as many of the core delivery teams (for example, Prevention Workers and Family Key Workers) as possible will work on the same IT system (Early Help Module) by October 2018 and that there are strong linkages with key external systems. This support more timely information sharing and support to children and families.

- 1.8 We believe this is the strongest model to pull people together and make best use of our collective resources, reach those families who need the most support whilst working with communities and partners to maintain a broader offer across the district.
- 1.9 Reductions and changes in available Government funding means that we are required to deliver further significant financial savings by 2020/21. We cannot continue to deliver services in the way we do now. We need to co-deliver key universal groups in areas of high need with community partners, for example, Stay and Play and support volunteer and community-led delivery in wider areas. As we implement the proposed changes we will build on our community asset base to support some of these activities. We need to create the capacity and capability to do this in those communities where there are more gaps.
- 1.10 A broad consensus of local authorities and MPs from across the political spectrum, health professionals, charities and others have raised concerns about funding for social care.
- 1.11 The Council will continue to support the Local Government Association campaign on children's services and children and young people's mental health, Bright Futures. This campaign's highlights:
- Child protection enquiries have increased nationally by 151% in 10 years
 - Children on child protection plans has increased by 23,000 over the same period
 - In 2016/17, approximately 90 children were coming into care each day creating the biggest annual increase in 7 years
 - Councils are facing a £2B gap for children's services by 2020
 - In 2015/16, children's services were forced to overspend £605M on children's services

1.12 Great Start and Good Schools is a transformational priority and we will only ensure babies, children and young people have a great start and improved life chances if we better target reduced resources and draw on the whole system of support, particularly the strengths and assets within families and local communities.

2. BACKGROUND

2.1 This report does not intend to revisit much of the information which is held in the report provided to Executive on 7 November 2017. At that Executive meeting it was agreed to carry out a public consultation between 15 November 2017 until 12 February 2018 on the preferred model, which would:

- deliver new 0-19 Prevention and Early Help Service targeting those communities/neighbourhoods with the poorest outcomes;
- deliver the Children's Centre core offer to support school readiness, parenting skills and family health in early childhood;
- ensure high levels of early education quality and take up;
- support education and attendance as a priority;
- ensure intensive support for those families in greatest need;
- cut out duplication and provide a 'whole family' approach so families do not receive a series of interventions from different services.

2.2 The Council and partners have agreed that the future proposed model of delivery needs to work to the following partnership vision and principles:



3. MESSAGES FROM PUBLIC CONSULTATION

- 3.1 Peopletoo was commissioned to undertake and report on an independent analysis of consultation. The full report of the findings of the consultation is published alongside this report and can be found in Appendix 4.
- 3.2 The consultation gained the views of interested parties i.e residents, partners and affected teams through a variety of methods, including a consultation (completed both off and on-line) questionnaire, consultation events, focused group sessions with young people, presentations to key groups/committees/partnerships and both email and freepost facility for responses.
- 3.3 During consultation we were able to gain an extensive range of views on the proposed model. As expressed in our partnership vision, we must draw together the ‘total’ resources as a district and within communities going forward.
- 3.4 Responses included:
 - 1189 consultation questionnaires completed;

- 201 members of the public attended one of the consultation events;
- Over 400 members of staff attended specific briefings;
- 174 emails providing detailed responses;
- An alternative model of delivery based on a Family Hub Model around schools;
- “Save Bradford Children’s Centres” petition with 2,508 signatures;
- 19 focus groups with young people involving a total of 115 young people.
- Response from the Traveller Community.

3.5 Overall, responses received from young people were very supportive of the principles of the proposals, particularly the Family Key Worker approach and area-based working.

3.6 79% of respondents to the consultation questionnaire stated that they either “strongly disagree” or “disagree” with the overarching proposal to create an integrated Prevention and Early Help Service for 0-19-year olds (25 for young people with special educational needs and/or disabilities). However, a more detailed analysis highlights important factors in relation to this feedback:

- consultation evidence shows a marked difference between respondents to the questionnaire and those who attended events, with the former being more negative about proposals than the latter, where there would have been more opportunity for clarifications and questions;
- that many respondents whose comments implied that they disagreed with the proposals, expressed comments that predominantly disagreed with the principle of budget reductions, rather than the model itself which was the primary subject of the question, and this will have impacted on this figure;
- this figure changed within the last week of the consultation following from strong representation by those in support of Children’s Centres;
- 61% were in favour of an approach that prioritises those more in need of support, though some clarification sought as to whether it will be solely focussed on the most deprived neighbourhoods rather than also supporting those with needs beyond geographical boundaries, such as mental health and domestic abuse;
- more people disagree with the locality approach (44%) than agree (36%), whilst the key worker approach is equal between both agree and disagree at 41%.

3.7 The predominant reasons for concerns about the proposed model were:

- Support for some elements of the proposal but the fact that it is accompanied with a proposed 47-51% reduction in staffing resource to deliver was felt to be unrealistic;
- That staff that remained would be expected to work across too wide an age range, diluting skills and experience and not providing families with the specialisms that they needed;
- Impact of the changes on the Early Years agenda, and in particular the impact upon preparation for parenthood and the Children’s Centre offer.

3.8 Nursery Schools submitted an alternative proposal. This has been fully considered in the response to consultation set out below.

- 3.9 Proposals were presented to the five Area Committees and Children’s Overview and Scrutiny. Responses and recommendations to the proposals from these meetings have been considered in the response to consultation and are set out below.
- 3.10 **The table below sets out the main findings from consultations and actions/changes arising from findings:**

An Integrated 0-19 Prevention and Early Help Service (with 0-19 Public Health)	
<ul style="list-style-type: none"> • strength-based ethos and practice • People Can - working with and organising around the assets within families and communities 	
Consultation Findings	Action proposed to respond to consultation
<ul style="list-style-type: none"> • Representations around both providing further detail but also co-designing the detailed offer around how the model will work with the proposed reduced staffing across what are perceived to be four wide locality areas. • Protect as many frontline posts as possible. Risk of increasing demand on acute services. • Work closely with communities to address the significant anxiety around the reduction in Early Years support, preparation for parenthood and the children's centres core offer. • The development of a detailed plan around children's centre buildings use and reduce reliance on buildings. • A range of positive ideas were shared around supporting People Can. They broadly reinforce the need for skills, time and space to genuinely draw communities into co-designing services particularly in areas of high deprivation. 	<ul style="list-style-type: none"> • An additional 500K into Prevention and Early Help for 2018/19 and 2019/20 to aid transition to the new arrangements. • Increase in the proposed workforce from 197 to 246.5 FTEs with the majority of the increase from initial proposals in the Prevention Workers and Key Workers. • Changes in the number of management posts reducing from 21 FTEs to 18 FTEs. • We will ensure we are able to pick up needs outside of specific areas through keeping a priority on domestic violence, mental health etc and by providing an Early Help Gateway (inc Families Information and SEND Local Offer) for public and professionals, on-line offer, early help panels and consultation and advice through the 0-19 Family Hub Teams. • We will retain a dedicated service within Education Services focussed on safeguarding and vulnerable pupils. • We will retain a dedicated focus on New Communities and Travellers within Education Safeguarding (for example, Access Team funded by the High Needs Block). • Produce a detailed plan on the best collective use of buildings across the Council, key partners and communities so we can sustain as much funding into frontline workers by 2020/21. We would undertake consultation with interested parties if required prior to implementing any changes. • Continue to work with the VCS assembly and key partners on ensuring an asset based approach and co-design of detailed support in local areas. • Workforce development will build skills in asset planning and community involvement. • Maintain co-delivery with community partners of key universal groups in areas of high need, for example Stay and Play and support volunteer and community-led delivery in wider areas.

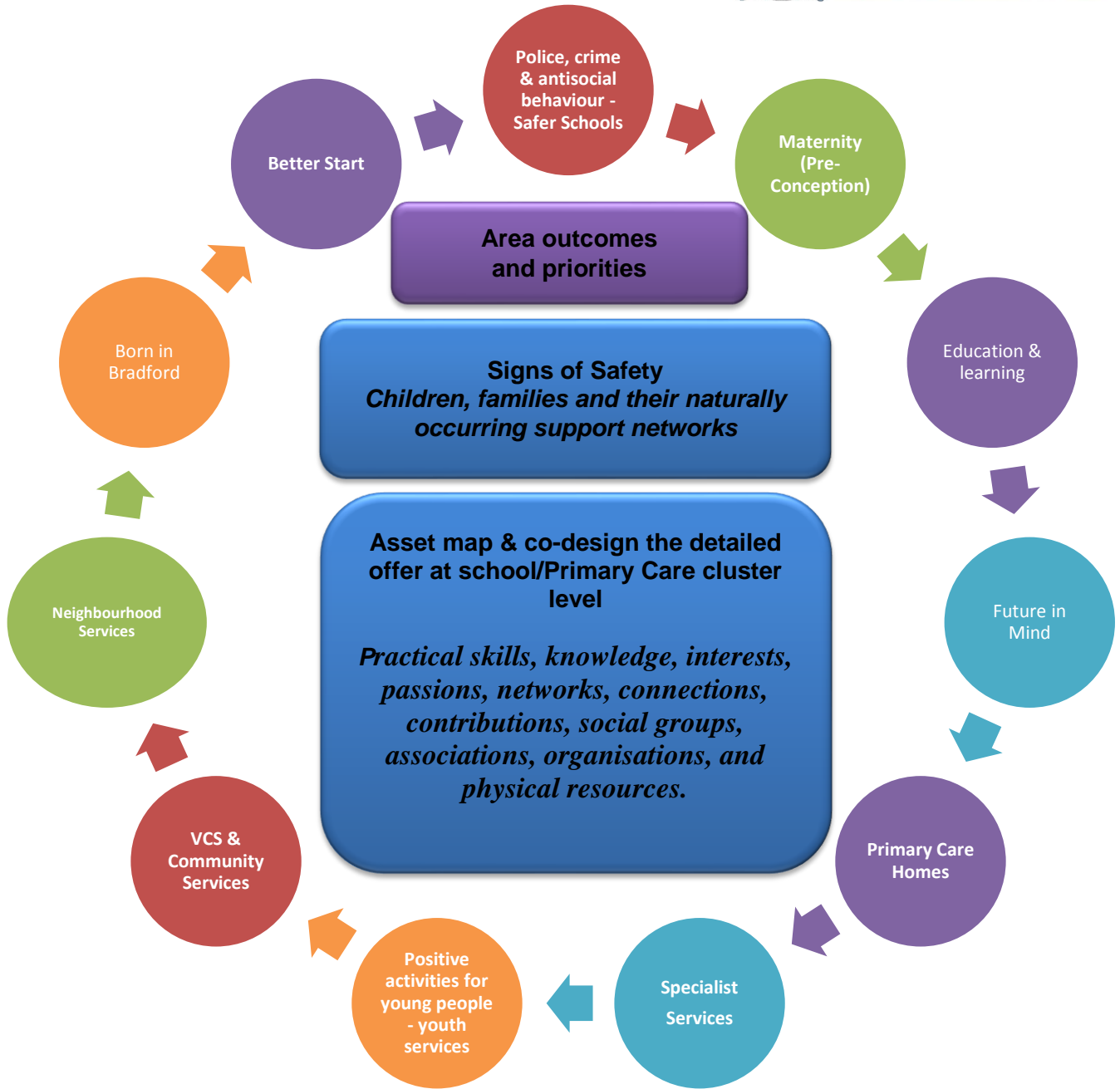
	<ul style="list-style-type: none"> • Four area partnerships and Area Outcome Plans will steer the focus of asset mapping and community planning aligned to the established schools and GP/Primary Care clusters. ○ The new recommissioned Public Health 0-19 children's service will have an area based leadership model which will be fully integrated with the 0-19 Family Hub teams.
<p>Continue to provide District-wide:</p> <ul style="list-style-type: none"> • Early Help Gateway for public and professionals • Focus on education safeguarding and children missing education. • Specialist Behaviour & Inclusion & Short Breaks for disabled children and young people • Intensive Family Support (and Family Group Conferences) for children on the edge of care. 	
<p>Consultation Findings</p>	<p>Action proposed to respond to consultation</p>
<ul style="list-style-type: none"> • Detail (and co-design) of a targeted approach and meeting needs which transcend geographical and social boundaries. • Services should be available as and when need arises, particularly outside of wards with the highest needs. Some groups are transient and cut across wards. • Ensuring a 0-19 service will prioritise its resource to the key points in a family's life pathway when they are most likely to need the support, for example in the Early Years or at adolescence. Support around social isolation and new to parenthood regardless of where a parent lives. Avoid stigmatising services as just for 'problem' families. • More detail on how the Customer Contact Centre, Families Information Service, Early Help Gateway and MASH would be co-ordinated. • Improving networking and join up with services supporting disabled children and their families. 	<ul style="list-style-type: none"> • We will ensure close integration and delivery of functions across Early Help Gateway, SEND Local Offer, Multi-Agency Safeguarding Hub (MASH), Families Information Service and Customer Contact Centre so that families are linked to the right level of support in a timely way. This will reduce agencies 'passing' families around. • As the area teams develop we will increase areas based access to support / local knowledge and closer working across school and GP/Primary Care clusters and school based parenting support workers. • We will ensure we are able to pick up needs outside of specific areas through keeping a priority on domestic violence, mental health etc and by providing an Early Help Gateway (inc Families Information and SEND Local Offer) for public and professionals, an on-line support offer, early help panels and consultation and advice through the 0-19 Family Hub Teams. • The Family Hubs will work closely with SEND teams and Parent's Forum to support early help around behaviours that challenge, social inclusion and access to leisure, sleep clinics and targeted parenting support for disabled children and their families.

<p>Four area based teams replacing separate standalone children’s centres, Education Social Work, early help cluster teams. More intelligent targeting those areas where children experience more adverse circumstances.</p>	
<p>Consultation Findings</p> <ul style="list-style-type: none"> • The need to ensure that area teams work closely with the Voluntary and Community Sector to deliver the core offer through Family Hubs within communities. • Maintain a focus on supporting family resilience and develop the new Service as Family Hubs. • The four areas are large and there will be a need to co-produce the services around schools as centres of universal support in communities. • The further development of the People Can concept, picking up the constructive suggestions submitted as part of this consultation. 	<p>Action proposed to respond to consultation</p> <ul style="list-style-type: none"> • Maintain co-delivery with community partners of key universal groups in areas of high need, for example Stay and play and support volunteer and community-led delivery in wider areas. • We will deliver area based plans and partnership and focused down at a school cluster level for asset mapping and co-producing community timetables. • Increase predictive and targeted work and ‘team around the schools’ where most domestic violence is occurring and most referrals to social care. • Prevention Teams will lead on mapping and community timetabling drawing on the total resource in areas and clusters.
<p>The delivery of evidence based programmes. Priority focus on children’s centre core offer and parenting support across the ages and stages.</p>	
<p>Consultation Findings</p> <ul style="list-style-type: none"> • Securing a children’s centre core offer and groups in communities which build up trust and confidence, particularly in more deprived areas. Concern that more children may fall through the net. • Support around social isolation and new to parenthood regardless of where a parent lives. Avoid stigmatising services as just for ‘problem’ families. • Be aware of how distance to travel to services may hinder access. Maintain a mix of delivery sites which provide privacy when needed. • Need to focus on a delivery offer which builds on schools, voluntary sector and draws money from buildings into workforce. • Need to work closely with communities in developing the revised offer particularly where centres are moving to outreach. 	<p>Action proposed to respond to consultation</p> <ul style="list-style-type: none"> • Prevention Workers and Seniors in each area will lead co-planning and co-delivery. • Family Key Workers will be able to support programmes with an appropriate adjustment to caseloads. • We have incorporated the previously proposed Access and Take Up posts into the Prevention Worker role and each area will have targets regarding childcare take up. • Area Partnerships will undertake the functions of required Advisory Groups overseeing that the children’s centre core offer is secured. • Initiate cluster based mapping and planning and align more closely to the established school and GP/Primary Care clusters. Continue to work with VCS assembly and Neighbourhoods as we develop community timetables linked to Primary Care and school based clusters. • Co-plan and co-deliver the broad evidenced-based offer around in areas and clusters.

Each area will have a team of 0-19 Family Key Workers – these will work closely with Stronger Families and commissioned Key Workers commissioned through the voluntary sector.

Consultation Findings	Action proposed to respond to consultation
<p>Practitioners to make sure that they themselves are well informed in order to inform families and maximising the use of social media as a way of keeping this information “live”.</p> <p>Key workers need services to connect families too, respect issues about individuals within a family. Need to provide alternative worker if relationships breakdown.</p> <p>Key Worker role, clarifying that this role is not about being a specialist in every discipline but a one, trusted point of contact that can broker for wider support.</p> <p>Transition arrangements to enable time for new expertise to be built up. Takes time to build up broader experiences alongside training.</p> <p>Assure against high caseloads which would prevent intensive work and relationship building.</p> <p>Strengthening links across services supporting disabled children and their families, particularly around early support on behaviours that challenge and inclusion.</p>	<p>Within the Family Hubs, each Secondary School and Primary School cluster will be given designated first point of contact.</p> <p>Family Hubs will provide co-ordination and an information network across universal and targeted support in a cluster area</p> <p>We are developing a practice development on-line tool for workers/managers to map their experience and skills and areas for development (passport). This will also be tailored to form a self-assessment tool for organisations, for example schools. A multi-agency Working Group has developed a draft passport which identified the following elements for wider discussion:</p> <ul style="list-style-type: none"> ○ Getting the basics right ○ Building strong relationships and networks to help families help themselves ○ Preventing adverse childhood experiences by supporting attachments and parenting across the age range (from pre-birth and beyond). ○ Working across the ages and stages of children (physical, emotional & language development) ○ Family income, steps to work and money matters ○ Young people’s well-being, choices and risks ○ Working with community assets

- 3.11 Taking into account key evidenced-based guidelines and our local consultation feedback, we will now work closely with the key the partners set out below to co-plan and co-deliver the following outline Family Hub offer.
- 3.12 We will work with the cross-agency initiatives such as Signs of Safety implementation, the Integrated Care Pathway, Self-Care programme, European Social Fund/Lottery Stronger Families programme, Families First, Neighbourhood and youth services, B Positive Pathways and the Council's proposed transformation of SEND teaching support services.
- 3.13 This model builds upon and expands on our Families First approach. It will be the key arrangement through which we will reach families who need the most support and demonstrate our impact (payments by results) for those children and families.
- 3.14 This model focuses on how we can draw on the energy and experience across and within our communities as we co-design support. This means an approach which is hopeful and draws on what already exists and is best and most valued in families and communities:



Family Hubs core service offer – Signs of Safety assessment and plans

LEVEL 4 - Specialist Services -Timely step up and step down – Signs of Safety - Intensive Family Support/Family Group Conference – children close to care – preventing repeat removals

LEVEL 3 <u>Targeted & Family Key Work</u>	<ul style="list-style-type: none"> Families First/Stronger Families outcomes through Family Key Work Advice and consultation to Lead workers in universal services Domestic Abuse Recovery Together & Freedom Parents in treatment for substance misuse (pilot) Intensive support to build attachment (at risk of entry to care) 	<ul style="list-style-type: none"> Families First/Stronger Families outcomes through Family Key Work Advice and consultation to Lead workers in universal services Youth in Mind, Young People’s (CAMHS) buddies & substance misuse prevention Domestic Abuse Recovery Together & Freedom Parents in treatment for substance misuse Programme reducing child to parent violence
LEVEL 2 <u>Prevention & parenting programmes</u>	<ul style="list-style-type: none"> HAPPY focused on overweight women during and after pregnancy) Incredible Years & Ante-Natal and Welcome to the World Family Links – work across Better Start & Family Links (parenting) Bonding and attachment/language/social emotional – pre-birth to 2 home learning model Awareness and signpost and facilitate access to early education HENRY (parenting programme – Champions, group or 1to1) Breastfeeding – UNICEF accreditation, breastfeeding champions and peer support Home Safety checks (linked to 6-8 week) 1:1 support for mothers/parents – universal groups (e.g Stays & Plays) in targeted areas – mix of providers Community-based welfare/benefits advice and parenting workshops 	<ul style="list-style-type: none"> Positive activities for young people/National Citizenship/Duke of Edinburgh Youth in Mind – Wellness Recovery Action Plans Positive behaviour and social emotional education in schools Supporting targeted transitions projects Primary Mental Health Link Work School-based welfare/benefits and parenting workshops Family Links/Speakeasy/Time to Talk/CYGNET/Time Out for Dads parenting groups if needed Personal Advisors DICE (at risk of sexual exploitation) PREVENT awareness, On-line safety and self-care Safer Schools Police Officers
LEVEL 1 <u>universal health checks & early education</u>	<ul style="list-style-type: none"> Ante-natal face-to-face visit during pregnancy New birth face-to-face visit focused on breastfeeding, immunisations, healthy start. Assessment of attachment. 6-8 week face-to-face assessment – weigh/measure/maternal mood, breastfeeding and family well-being. 3-4 month face-to-face visit maternal mood, family well-being & safety, immunisations, attachment. 1-year face-to-face assessment of physical, social and emotional needs using Ages & Stages. Monitoring growth, attachment, vaccination and imms check. Health promotion and Oral health advice. 2-2.25 year integrated assessment using Ages & Stages (social, emotional and language). Link with childcare setting. Parenting, sleep and toilet training and behaviour management. Physical growth, development hearing, vision. Signpost to early education. 	<ul style="list-style-type: none"> 4-5 Year olds - handover to school nurse and health needs assessment in reception. Identify looked-after and complex health needs and signpost. Year 7 (11 years) - National Child Measurement Programme (identify and support obese children). Identify health concerns and issues and support for long-term conditions and vulnerable children YEAR 10 - HEALTH NEEDS ASSESSMENT Identify and support vulnerable children. Health promotion and support CYP with additional needs and signpost to specialist services Post-16 - transition to adulthood review vulnerable children. Health promotion advice Health surveillance and assessment of need



PREGNANCY



SCHOOL



ADULTHOOD

3.15 We will also ensure delivery, through a commissioned service, of the following oral health activity:

- Training for pregnant women who are free for dental treatment
- Brushing for life campaign- delivery of free tooth brushing packs
- Fluoride Varnish Programme
- Tooth brushing in schools
- Screening surveys

3.16 To implement the proposed model, an indicative timeline is below:

Date	Activity
03 April 2018	Report to be presented to Executive
May 2018	Commence proposed re-structure/assimilations
May 2018	Issue tender documents for 0-19 public health service
June 2018	Initiate Area Partnerships and outcomes dashboard (draw together with local clusters)
End June 2018	Confirm transitional arrangements for summer 2018
June to September	Asset mapping & drafting community (cluster) timetables
September 2018	Assimilations completed
October 2018	Proposed Family Hub services commence
1 April 2019	New 0-19 public health service go-live

4. OTHER CONSIDERATIONS

4.1 This proposal sits alongside wider cross-agency and system initiatives such as the Integrated Early Years Strategy, Signs of Safety implementation, the Integrated Care Pathway, self-care, European Social Fund/Lottery Stronger Families programme, B Positive Pathways, early work around joint commissioning and the Council's proposed transformation work on SEND.

4.2 The proposed model incorporates our commitments to the Department for Communities and Local Government under the Families First programme.

5. FINANCIAL & RESOURCE APPRAISAL

5.1 In 2013/14, the government gave Bradford a core grant of £183 million to fund local services across the district. By 2020, they will have cut that to zero.

5.2 On 20 February 2018, Council's Executive agreed an amended budget and, in response to the high levels of consultation feedback, proposed a £1m transitional increase into Prevention and Early Help over two years subject to an appropriate detailed business case. This money will only be made available should the

consultation result in a change in delivery model. If the proposed change does not go ahead then the additional monies will return to the Transition and Risk Reserve.

- 5.3 Council intends to reduce reliance on buildings and release further funding into the front-line workforce, any development and change to buildings will be reported to Executive. We would undertake consultation with interested parties if required prior to implementing any changes.
- 5.4 Alongside core Council funding, services also receive income from a number of external sources. These include the Dedicated Schools Grant, Family First Programme Grant Funding and Youth Justice Board grant funding. Unless stated, spending proposals relate to use of core Council funding. The Council and partners will need to work closely to maximise funding to the district, for example, submitting partnerships bids and developing new funding through social investment.
- 5.5 As the proposal would be such a significant programme of change, additional dedicated support is provided from Human Resources, Workforce Development, Communications, Finance, Asset Management and Legal Services. The Council has set aside one off resource of £500,000 to fund enabler support.

6. RISK MANAGEMENT AND GOVERNANCE ISSUES

- 6.1 This is a large programme of work across a number of service areas that requires delivery at a considerable pace. It requires significant, meaningful on-going engagement and communication with partners, schools, early year's settings, the workforce and families currently accessing the services and prospective families and other interested parties.
- 6.2 Similarly, under the direction of the Health and Wellbeing Board, partners will work together to ensure an all ages approach to prevention and early help and will track and mitigate risks over time. This again will take an asset based approach focused on the assets which already exist, solution finding and responding to risks across the system as a whole.
- 6.3 The procurement of Public Health 0-19 children's services is underway with a view to having the new service in place by April 2019. For this whole approach to work it is essential this procurement is completed in a timely manner and any delays to this process need to be minimised. Work is underway to ensure the approach planned is clear and robust. An engagement event was held with potential suppliers and interested stakeholders in February 2018 and two further events will be held in March and April 2018.

7. LEGAL APPRAISAL

- 7.1 The report dated 7 November 2017, set out the Local Authority's duty to consult or requirements set down in legislation or statutory guidance. For example, the Department for Education Sure Start children's centre statutory guidance April 2013 provides that the Local Authority must ensure there is consultation with interested parties before any significant changes are made to children's centre provision in their area.
- 7.2 The SEND Code of Practice 0-25 years January 2015 provides that when considering any reorganisation of special educational needs provision the Local Authority must

make clear how they are satisfied that the proposed alternative arrangements are likely to lead to improvements in the standard, quality and/or range of educational provision for children with SEN.

- 7.3 The Local Authority must have regard to its public sector equality duties under section 149 of the Equality Act 2010 when exercising its functions and making any decisions. The Local Authority must carry out an Equalities Impact Assessment to enable intelligent consideration of the proposals. The Local Authority must have due regard to the information in the Equalities Impact Assessment in making the decision to commence consultation on these proposals.
- 7.4 The Children Act 1989 sets out the provision of services for children and their families. Section 17 places a duty on every local authority to safeguard and promote the welfare of children who are in need within their area and to promote the upbringing of such children by their families.
- 7.5 The Children Act 2004 as amended by the Apprenticeships, Skills, Children and Learning Act 2009 set statutory targets for children's services authorities for improving the effectiveness of safeguarding and promoting the welfare of children through promoting better inter-agency co-operation and improved information sharing. The 2009 Act also established Children's Trust Boards.
- 7.6 The Council has duties under the Childcare Act 2016:
- Section 1 – duty to improve well-being of young children & reduce inequalities between them;
 - Section 3 – to make arrangements so that early childhood services are integrated, accessible and benefit young children and their parents;
 - Section 5A – make arrangements for sufficient children's centres, so far as reasonably practicable to meet local need;
 - Section 6 - duty to secure sufficient childcare for working parents;
 - Section 12 - duty to provide information, advice and assistance to parents and prospective parents;
 - Section 13 - duty to provide information, advice and training to childcare providers.
- 7.7 Early years providers have specific statutory requirements under the Childcare Act 2006 to contribute to the safeguarding of children and to comply with welfare requirements to promote good health and maintain records, policies and procedures.
- 7.8 Working Together to Safeguard Children (DfE, 2015) sets out the responsibilities that everyone including teachers, GPs, nurses, midwives, health visitors, early years professionals, youth workers, police, Accident and Emergency staff, paediatricians, voluntary and community workers and social workers has to safeguard and promote the welfare of children, provide early help and for keeping them safe.
- 7.9 The Education Act 1996 as amended requires all local authorities to make arrangements to enable them to establish the identities of children in their area who are not receiving a suitable education. The duty applies in relation to children of compulsory school age who are not on a school roll and who are not receiving a suitable education otherwise than being at school.
- 7.10 The Children and Families Act 2014 has further influenced and shaped service

delivery. It aims to improve services for vulnerable children, children in need of care and support, children with special educational needs and disabilities and support families in balancing home and work life particularly where children are particularly very young. It underpins wider reforms to ensure that all children and young people succeed, no matter what their background.

- 7.11 In the case of those staff working in the children's clusters run by Barnardos and Action for Children, those staff who fall within the ambit of the Transfer of Undertakings (Protection of Employment) Regulations 2006 ("TUPE"), will transfer to the Council's employment on their existing terms and conditions. Those staff who work in community nursery schools are in law employees of the Council and therefore TUPE will not apply, as there is no change of employer. Accordingly it will be necessary to discuss appropriate arrangements with the governing bodies concerned. Appropriate employment procedures will be followed in relation to proposed reductions in the workforce.
- 7.12 Local authorities have duties outlined in the Health and Social Care Act (2012), which came into force in April 2013 when Public Health transferred to the Council, and this includes delivering public health children's services for 0-19 year olds and specific mandated and statutory functions including 5 health checks for young children, the National Child Measurement Programme and district wide Oral Health surveys.
- 7.13 Local Authorities statutory Public Health responsibilities also include a duty to improve Public Health, Section 31 of the 2012 Act requires local authorities to have regard to guidance from the Secretary of State when exercising their public health functions; in particular this power requires local authorities to have regard to the Department of Health's Public Health Outcomes Framework (PHOF).
- 7.14 *A Public Health outcomes framework for England* sets out the Government's overarching vision for public health, the desired outcomes and the indicators that will be used to measure improvements to and protection of health. *Improving outcomes and supporting transparency*, provides a summary technical specifications of public health indicators.
- 7.15 Section 237 of the 2012 Act also requires local authorities to comply with National Institute for Health and Care Excellence (NICE) recommendations to fund treatments under their public health functions.
- 7.16 Local Authorities also have responsibilities under this Act to set up a statutory Health and Wellbeing Board to oversee a Health and Wellbeing Strategy to improve health and wellbeing outcomes and reduce inequalities for the population across the district.

8 OTHER IMPLICATIONS

8.1 EQUALITY & DIVERSITY

- 8.1.1 The Local Authority must not discriminate directly or indirectly against any group or individual and is required to foster good relations.
- 8.1.2 An extensive consultation has been undertaken. Officers have worked through key teams, partnerships and networks to ensure all interested parties were made aware of the multiple opportunities to contribute their views and responses.

8.1.3 An updated Equalities Impact Assessment and SEN Improvement Test for the proposed model is attached as **Appendices 5 and 6**. An updated Workforce Equalities Impact Assessment is also in place.

8.2 SUSTAINABILITY IMPLICATIONS

8.2.1 There are no direct sustainability implications arising from this report.

8.3 GREENHOUSE GAS EMISSIONS IMPACTS

8.3.1 The proposals would not impact on gas emissions.

8.4 COMMUNITY SAFETY IMPLICATIONS

8.4.1 Through working differently across services, such as Police and Neighbourhood Services we would seek to reduce crime and anti-social behaviour and its impact on individual families and communities. This is a priority outcome area.

8.5 HUMAN RIGHTS ACT

8.5.1 There are no direct Human Rights implications arising from this report.

8.6 TRADE UNION

8.6.1 On 30 October 2017, the Council issued a letter under Section 188 Trade Union and Labour Relations (Consolidation) Act 1992 ("TULRCA") notifying the Trade Unions about the potential impact on the workforce in relation to the proposals outlined in this report

8.6.2 The trade unions were fully consulted on the proposals and fortnightly meetings have been undertaken with the Trade Unions. We will continue to engage closely with Trade Unions and affected staff through all stages of implementation. The feedback from the trade union consultation meetings is attached at Appendix 7.

8.7 WARD IMPLICATIONS

8.7.1 Ward Councillors were provided with open briefings throughout the public consultation.

9 NOT FOR PUBLICATION DOCUMENTS

None.

10. OPTIONS

10.1 This report seeks approval to implement the proposed Family Hub model for prevention and early help for babies, children, young people and families.

11. RECOMMENDATIONS

11.1 That the Executive, approves the Family Hub model of co-produced service delivery for prevention and early help and to the implementation of this model as per the timeline set out in this report;

11.2 That Executive agrees to the Strategic Director of Children's, in consultation with the

Portfolio Holder, producing a detailed plan on the best collective use of buildings across the Council, key partners and communities so we can sustain as much funding into frontline workers by 2020/21 which would be subject to further consultation as required.

12. APPENDICES

Appendices	Document
Appendix 1	Prevention and Early Help outcomes framework
Appendix 2	0-19 Family Hub partnership framework, core structures and functions
Appendix 3	Changes to Children's Centres sites
Appendix 4	Peopletoo consultation report
Appendix 5	Updated Equalities Impact Assessment
Appendix 6	SEN Improvement Test
Appendix 7	Trade Union feedback

13. BACKGROUND DOCUMENTS

- Report of Strategic Director to Executive dated 7 November 2017
- Bradford District Plan 2016 - 2020
- Bradford Council Plan 2016 – 2020
- Bradford Children, Young People and Families Plan 2017-2020
- Children’s Commissioner. Family Hubs: a discussion paper (October 2016)
- Integrated Early Years Strategy for children 0-7 years 2015-2018
- Bradford District Oral Health Strategy
- Bradford District Every Baby Matters Strategy and Action Plan
- Families Needs Assessment: An overview of the needs of families in Bradford and Airedale 2017.
- Fair Society Health Lives Marmot Review 2010
<http://www.instituteofhealthequity.org/resources-reports/fair-society-healthy-lives-the-marmot-review>
- 1001 Critical Days Report (2013) <http://www.1001criticaldays.co.uk/>
- Public Health England ‘Best Start in life and beyond’ Guidance (2016)
<https://www.gov.uk/government/publications/healthy-child-programme-0-to-19-health-visitor-and-school-nurse-commissioning>
- The effect of multiple adverse childhood events (ACEs) experiences on health
Lancet Public [http://www.thelancet.com/journals/lanpub/article/PIIS2468-2667\(17\)30118-4/fulltext](http://www.thelancet.com/journals/lanpub/article/PIIS2468-2667(17)30118-4/fulltext)
- Health Visiting and School Nursing Reviews: 2016 HSOSC Sept 2016 :
<https://bradford.moderngov.co.uk/documents/g6432/Public%20reports%20pack%2008th-Sep-2016%2016.30%20Health%20and%20Social%20Care%20Overview%20and%20Scrutiny%20Committee.pdf?T=10>

Appendix 1 - Prevention & Early Help - Outcomes Framework – Children, Young People & Families

This will form the basis of a district-wide and area dashboards

High Level Outcomes	
1. Children live in caring and resilient communities	
2. Children are able to learn and develop skills for life	
3. Children are healthy and well and reach their potential	
Outcome 1 – Children live in caring and resilient communities	
1.1 Children are safe	Data source & baseline
a. Children are safe within the home <ul style="list-style-type: none"> Reduce repeat incidents of Domestic Violence/child to parent violence (links to FF outcomes) Reduce LAC numbers Reduce CP numbers or numbers of children requiring child protection assessments (links to FF outcomes) 	Police DV notifications, Children’s Social Care. Safeguarding Board & Families First dataset. Local dataset Road Safety, national Child Health profile.
b. Children are safe within communities <ul style="list-style-type: none"> Reduction in number of incidents of Youth ASB reported/number of Youth ASB interventions served Reduce first time entrants (links to YOT) Reductions in children & young people missing from home and education 	YOT & Families First dataset. Local data and PH Outcomes framework.
1.2 Children live in resilient communities	
Improved social cohesion <ul style="list-style-type: none"> Percentage of people who agree that their local area is the place where people live together harmoniously 	District Plan. Also links to perceptions of crime.
b. Increased participation from communities <ul style="list-style-type: none"> Increasing numbers reported in ‘People Can’ projects Increased participation from communities in the education covenant, volunteering and/or co-delivery of preventative activity 	Local dataset to be collated.
c. Increased prosperity in communities <ul style="list-style-type: none"> Reduction in the number of children and young people living in workless households/households earning specified amounts. (links to Families First outcomes) 	Child Poverty Strategy
1.3 Children experience positive relationships	
a. Children have improved relationships within the home <ul style="list-style-type: none"> Increased levels of positive attachment in the under 5s Parenting confidence and capacity across the age range Maternal health and well-being (pre and peri-natal) 	PHOF 2.05ii Tracking within agreed programmes – outcome star. ASQ-SE at 2.5 years

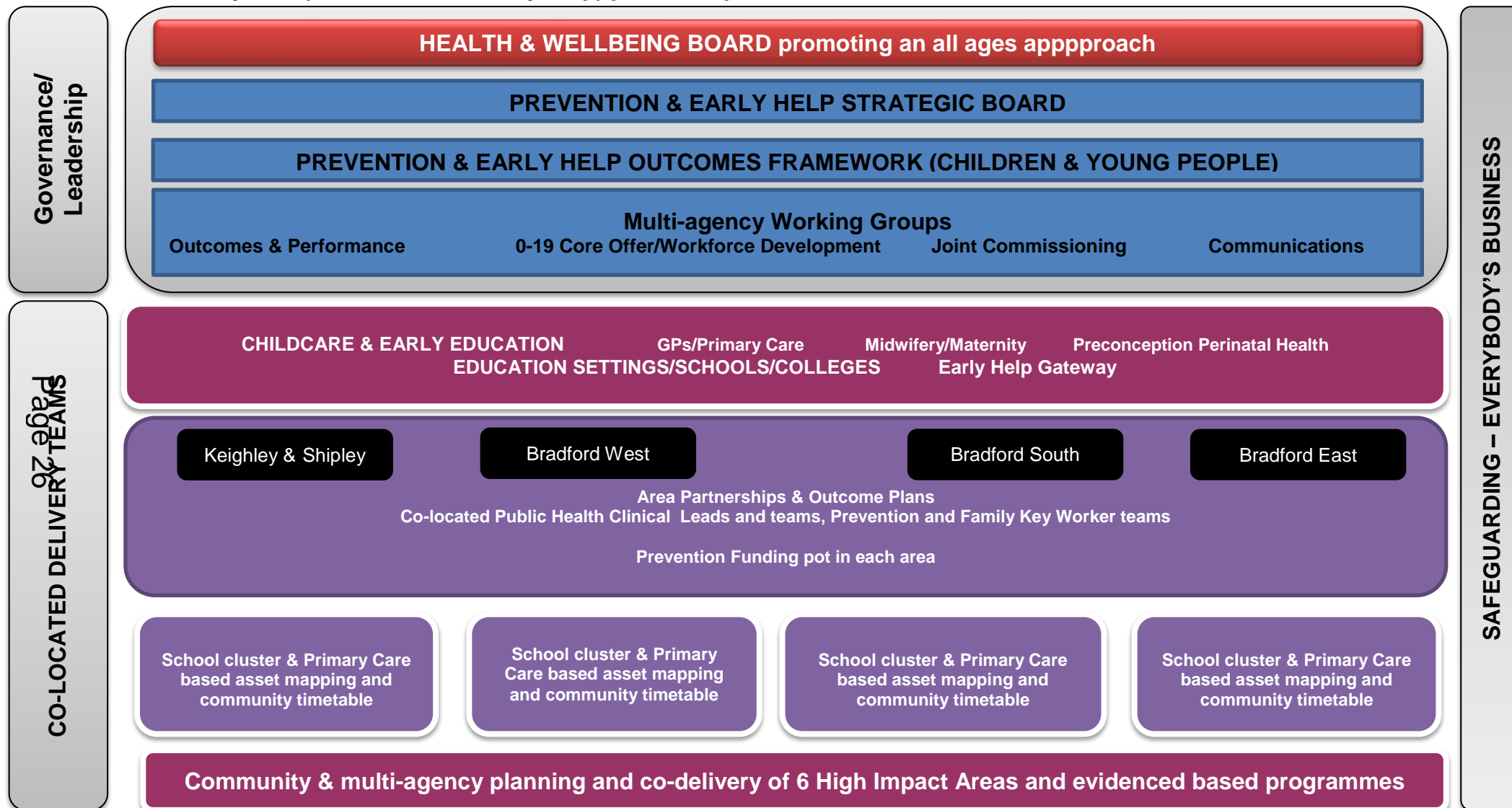
	Links to midwifery & public health assessments of maternal well-being.
b. Children with complex needs have positive relationships <ul style="list-style-type: none"> Numbers of children accessing short breaks. 	Local data
Outcome 2 – Children learn and develop skills for life	
2.1 Children achieve	
a. Children achieve in school <ul style="list-style-type: none"> Foundation stage profile results improve to meet the national average (currently a Good level of development) AND gaps between our vulnerable groups and boys and girls and their peers nationally reduce (PHOF 1.02). Focus on language, social and emotional domains 	School readiness from PHOF dataset EYFS – need to specify expectations regarding 2-year assessments and home learning prior to age 2.
b. More children go onto higher education <ul style="list-style-type: none"> Increased number attending university and narrowing the gap for vulnerable groups (links to Employment & Skills) 	Employment & Skills
c. Children go onto high quality employment <ul style="list-style-type: none"> Increased high level jobs figures Reduced number of 16-18 year olds not in education, employment or training (NEET) (PHOF 1.05) (links to Employment & Skills) 	Employment & Skills
2.2 Children learn in high quality environments	
a. Early years provision is of high quality <ul style="list-style-type: none"> The proportion of early years settings achieving good or better outcomes in their Ofsted inspections increases to at least meet the national averages particularly in deprived areas. 	Local dataset.
2.3 Children participate in learning experiences from 2-19	
a. Children attend schools <ul style="list-style-type: none"> Improved attendance levels at all key stages. 	Local dataset.
b. Children participate in learning 16-18 in line with RPA <ul style="list-style-type: none"> Improved participation levels Post 16 year on year 9 (links to joint work with Employment & Skills) 	Employment & Skills
c. Increased take up of places in pre-school learning (early education and childcare) <ul style="list-style-type: none"> Increased take up of eligible 2 year-olds for the universal offer and 3 and 4 year-olds for both the universal offer and the extended additional 15 hours (i.e. the '30' hours offer). 	Local dataset.

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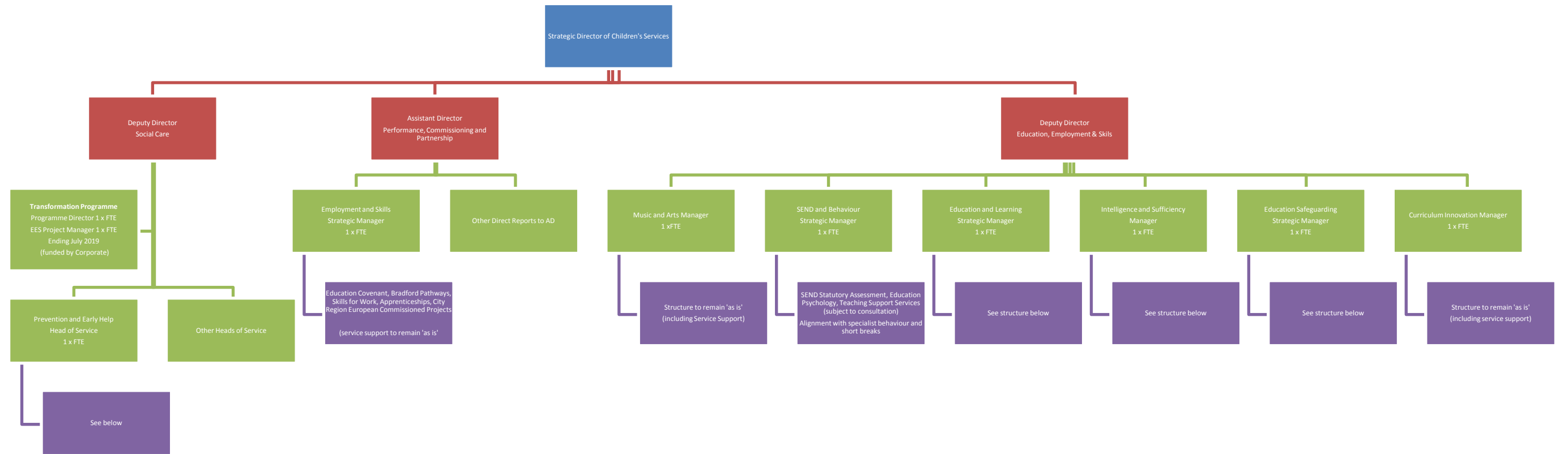
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Outcome 3 – Children are healthy and well and reach their potential	
3.1	
<p>a. Fewer baby deaths in first year of life *</p> <ul style="list-style-type: none"> • Infant mortality rate reduces and at a faster rate in deprived areas (PHOF 4.01 & NHSOF 1.6i) • More babies are breast fed at discharge and 6-8 weeks (PHOF 2.02) • Reduced smoking for pregnant women at delivery and increased smoke free homes in infancy (PHOF 2.03) • Improved attachment and bonding and maternal mental health (see Outcome 1.3) 	PHOF data & Child Health Profile.
<p>b. Fewer children are obese or overweight</p> <ul style="list-style-type: none"> • In reception aged 5-6 years (PHOF 2.06) • At age 10-11 years (PHOF 2.06) 	PHOF data & Child Health Profile.
<p>c. Children will improved oral health</p> <ul style="list-style-type: none"> • Decayed, missing, filled teeth (dmft) at age 5 figures improve and at faster rate in deprived areas (PHOF 4.02 & NHSOF 3.7i) 	PHOF data & Child Health Profile. DMFT figures - every 3 or 4 years. Supplement this indicator with hospital admissions for dental caries in 0-4 year olds
<p>d. Children will be emotionally resilient and make good lifestyle choices</p> <p>Reduction in self harm admissions (PHOF 2.10) Smoking prevalence 15 year olds (PHOF 2.09) Under 18 conceptions (PHOF 2.04)</p>	PHOF data & Child Health Profile. There is data around hospital admissions for mental health conditions in 0-17yr olds. Referrals to CAMHS? Or GP prescribing? Or improved access to support services.
<p>e. Children will less often be admitted to hospital due to illness or accidents</p> <ul style="list-style-type: none"> • Rates of admissions to hospital for young children aged 0-4 years reduces • Rates of admission due to accidents reduces (0-14 years and 15-24 years)reduces (PHOF 2.07) • Killed and Seriously Injured on roads/Reduce reported child road traffic injuries 	PHOF data & Child Health Profile. Local dataset Road Safety, national Child Health profile.

APPENDIX 2 – Family Hub (Prevention and Early Help) partnership framework, core structure and functions



Proposed Departmental Management Structure

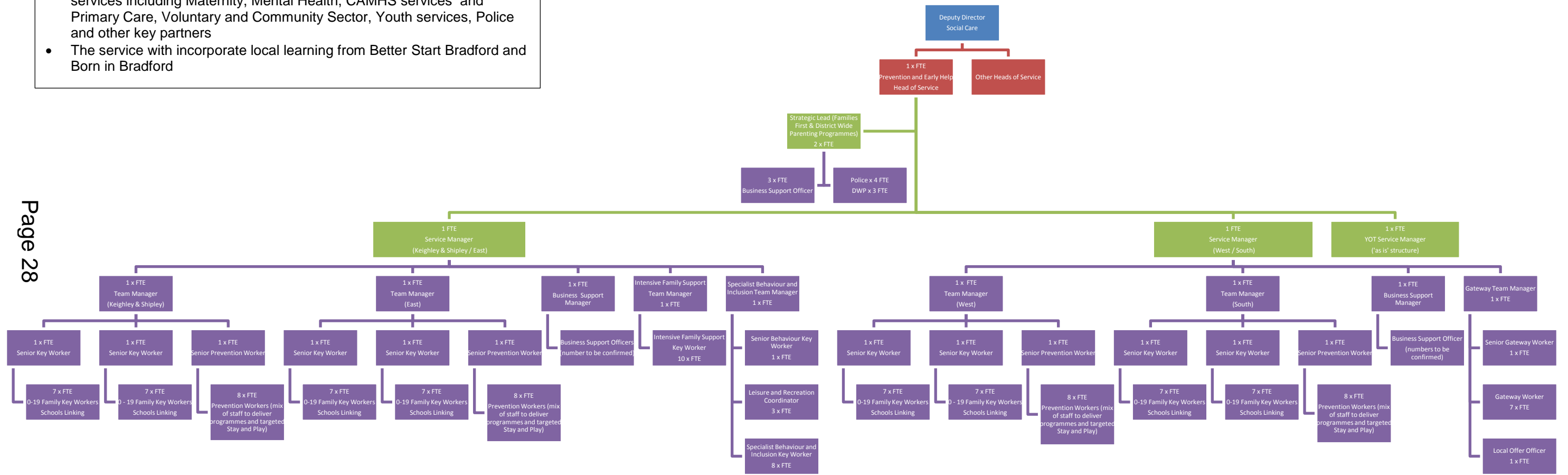


Proposed Prevention and Early Help Family Hubs Structure

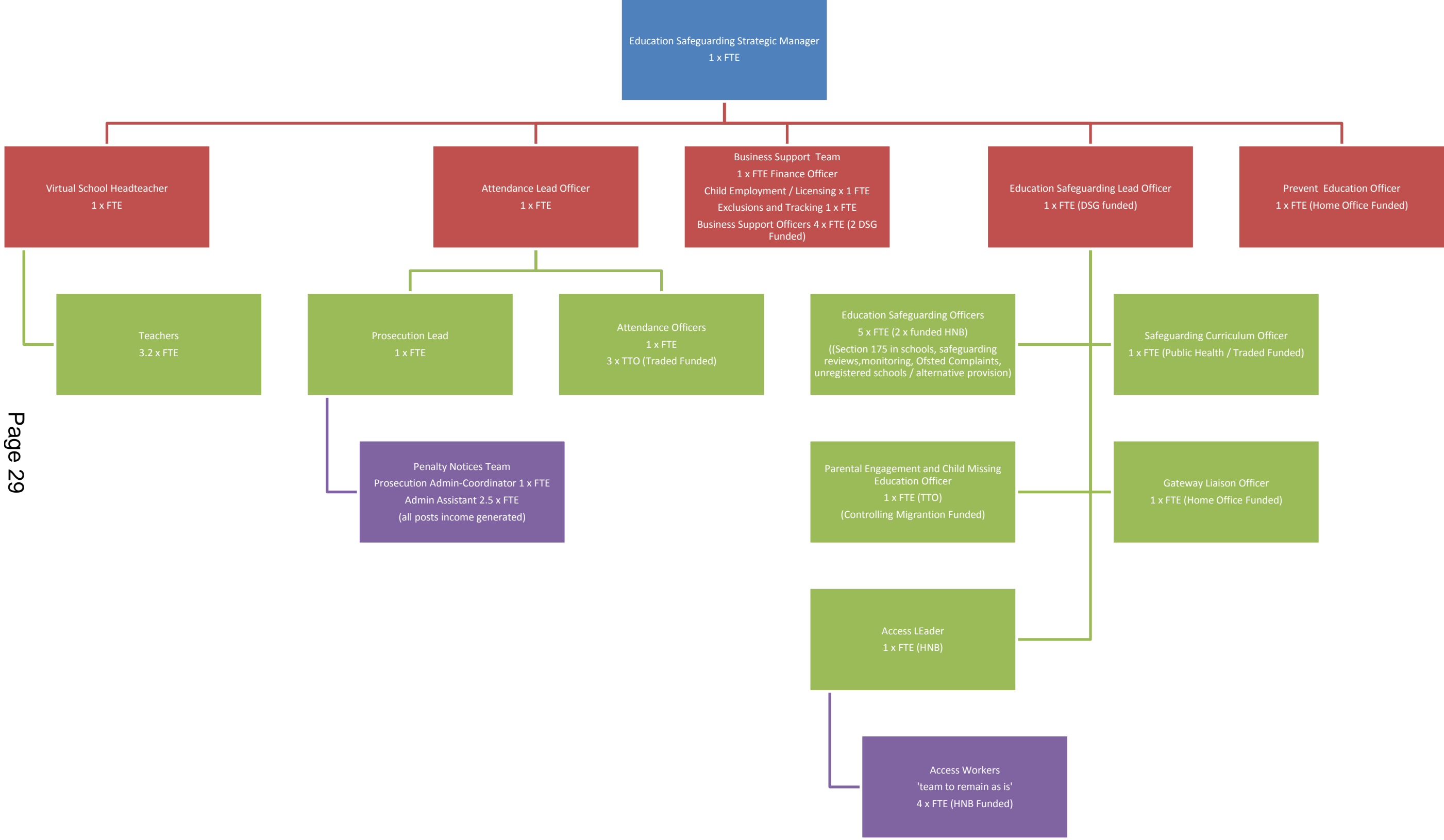
- The Public Health 0-19 Children's Service will be integrated with Prevention and Early Help (PEH) teams based on the 4 locality model
- The mandated visits will be delivered universally to all pregnant mothers and families with young children identifying risks and issues at an early stage
- Public Health nurses will be part of the service (qualified Health Visitors and School Nurses) working with an appropriate skill mix of staff within the service
- There will be a clinical leadership team which leads in all 4 localities for all children 0-19 and 0-25 for SEND children working with the PEH teams
- This approach will provide Champions for the high impact areas -There will be targeted interventions to those who need it most with clear pathways to the Prevention and Early Help teams, Social care, NHS services including Maternity, Mental Health, CAMHS services and Primary Care, Voluntary and Community Sector, Youth services, Police and other key partners
- The service will incorporate local learning from Better Start Bradford and Born in Bradford

- Service/Team Champions/ Specialism to be agreed
- Additional Family Key Workers also commissioned from VCS (presently provide approx. 20 FTE Key Workers)
- Play Team within traded services as proposed

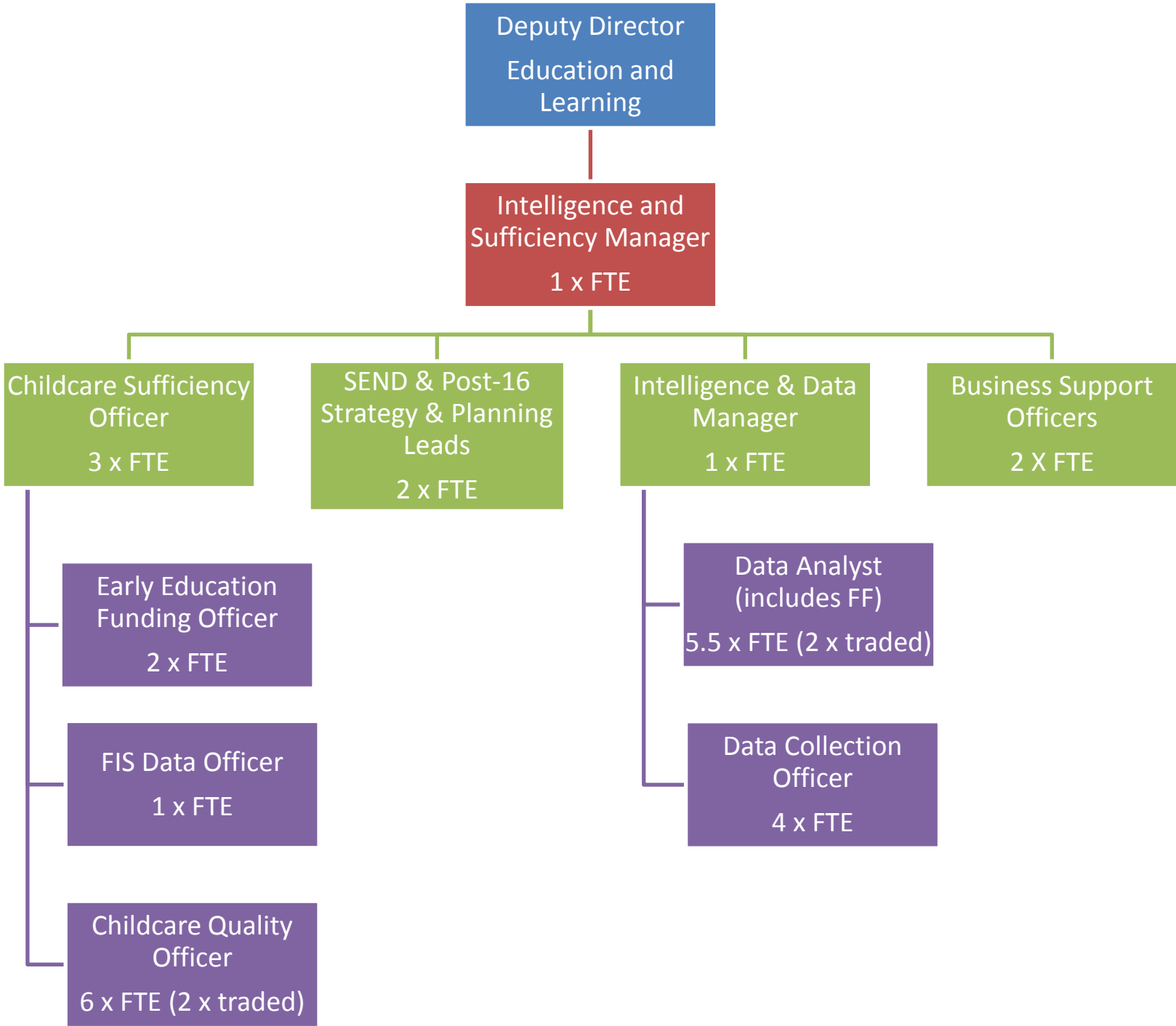
Page 28



Proposed Education Safeguarding Structure



Proposed Intelligence and Sufficiency



- The teams and functions below will work together with communities, universal and commissioned services, for example, co-delivery of groups with schools, short breaks for disabled children and young people and commissioned key workers
- Service support to be integrated within teams – some dedicated posts for priority and statutory business support areas

<p>The core functions in each of the four areas:</p>	<p>The following would provide a district-wide focus:</p>
<p>Strategic & Service Managers:</p> <ul style="list-style-type: none"> • To champion and facilitate area partnerships which focus and drive Family Hub delivery • To ensure high quality district-wide and commissioned services • To oversee, implement and report on Area Outcome Plans supporting district-wide improvements in outcomes • To lead the area teams and assure the delivery of high quality services • To ensure that children, young people and their families have a voice and influence in the area offer • Facilitate integration, co-location, co-design and co-delivery with aligned services • To model and support a People Can ethos • Responsibility for maintaining specialist knowledge and experience in a defined areas of the service, leading on this throughout the service: <ul style="list-style-type: none"> ○ Early childhood development & children’s centre core offer ○ Young people’s support ○ Commissioning 	<p>Intelligence & Sufficiency (childcare, SEN and post-16):</p> <ul style="list-style-type: none"> • Data analysis and predicting/targeting needs to focus service delivery • Performance overview/reports • Meet childcare sufficiency duties including universal 2 year-old 15 hour offer and 30 hour offer for 3 and 4 year-olds and working in collaboration with School Admissions Team • SEND sufficiency and statutory consultations • Sufficiency strategy and planning and gap analysis • Market development and communications arising from Sufficiency Assessments • Maintain profile of childcare across the district • Task focused projects <p>Early Education and Childcare Quality:</p> <ul style="list-style-type: none"> • Ensuring the highest possible standards of childcare quality through a rigorous support and challenge approach with settings (Private, Independent and Voluntary providers) and childminders who are in receipt of early years funding where Ofsted judgments are Inadequate, Requires Improvement, Not Met and non-compliant and for other childcare providers (including out of school clubs) where Early Years Foundation Stage children are present to monitor quality and safeguarding. • Deliver services to potential new childcare (child minders & group settings) providers from the registration process, ensuring their practice and facilities are of a high standard, to meet the welfare, early learning and development needs of children in the Early Years Foundations Stage. • Maintain the partnership links to promote LA District trends and patterns to identify and promote the strategies to ensure all children receive a great start to improve outcomes at the end of EYFS. • Early Education Funding.
<p>Family Hubs Prevention Planning Teams:</p> <ul style="list-style-type: none"> • To work with partners and local communities to develop and implement a community timetable of evidence based programmes in response to needs (aligned to school and Primary Care clusters) • Monitor and ensure impact, accessibility and engagement from across targeted community groups • To ensure that the following areas are central to the offer: <ul style="list-style-type: none"> • Early childhood development and school readiness • Parenting skills through the age ranges • Health and wellbeing • Family and maternal health and mental health • Positive activities for young people • To facilitate co-delivery with volunteers and service users • Increasing the uptake of all eligible children for early education places via outreach directly with parents in the community, community groups and organisations and other key partners such as BSB, VCS organisations • Targeted activities in communities with lower take up of childcare – focus on pre-birth to 2 home learning <p>A pot of funding will be made available in each area to support community involvement in delivery of prevention activities.</p>	<p>Early Help Gateway (incorporating SEND Local Offer and Families Information Service):</p> <ul style="list-style-type: none"> • Joint protocol across Multi-Agency Safeguarding Hub (MASH), Gateway and Customer Contact Centre • Statutory duty to establish and maintain a service providing information, advice and assistance to families with children up to 20 years old (25 years for those with additional needs) regarding: Childcare and Early Education, Parent & Toddler Groups, activities for Children with Additional Needs, leisure activities for all ages and abilities and Family Support Services • SEND Local Offer • Timely response to requests for support in line with agreed threshold guidance • Ensuring all relevant families are linked to Families First • Signpost families to support and make referrals on their behalf for issues including if needed: children’s behaviour, financial difficulties, mental health and domestic violence • Respond to requests for support from the Corporate Contact Centre (which they have not been able to advise and signpost) • Provide an email text service for families in English and also Polish, Slovak, Czech, Urdu & Punjabi • Intention is to build area based pathways to support to minimise call on gateway when possible
<p>Family Hubs - Public Health 0-19 services</p>	<p>Education Safeguarding:</p>

<ul style="list-style-type: none"> • Statutory responsibility for delivering and commissioning public health services for children 0-19 years. Delivering on the Public Health Outcomes Framework. • The functions under these will include: <ul style="list-style-type: none"> ○ Delivery of the five mandated health checks by Health Visiting teams universally to all women antenatal, at birth, 6 months, 1 year and at 2 years ○ Leading work with partners to deliver on the Healthy Child Programme and high impact areas for all children 0-19 years, providing clinical leadership to prevention teams and providing an enhanced service to women who are identified with issues such as post natal depression or child health problems ○ Delivering on the National Child Measurement Programme, hearing screening and signposting to screening and other services as appropriate ○ Identifying health needs through assessment of school age children at Reception, Year 6, Year 10 and transition so needs of children are identified and addressed early with signposting to and working with other key services as appropriate. • Oral health improvement as appropriate: <ul style="list-style-type: none"> ○ Delivery of the fluoride varnish programme ○ Supervised tooth brushing in schools ○ Support epidemiology and Screening in schools. • A specification will be developed which will ensure that these services are integrated to the new proposed functions and the area footprint. 	<ul style="list-style-type: none"> • Overview and targeted interventions/support and challenge regarding safeguarding in schools, educational attendance, children missing education and elective home education • Predictive targeting to improve attendance in areas • Traded whole school work in support of pupil attendance and well-being • Safeguarding training & guidance to settings and schools • Attendance penalty notices and legal action • Local authority’s duties in regard to exclusions • Child employment and entertainment licensing • Engage and support Asylum Seekers, Refugees, EU Migrant Workers and Roma families and families from the traveller community to access to education and to offer support and guidance to schools.(Home Office and DSG funded) • PREVENT education (externally funded).
<p>Family Hubs Key Workers & Seniors (Families First Council and VCS)(links to Stronger Families programmes):</p> <ul style="list-style-type: none"> • Facilitate advice, guidance and support to local services and assure Early Help Panels (as close as possible to school clusters). Provide a Lead to each Locality Achievement Partnership and High School) • Timely response to requests to support and family-lead Signs of Safety plans • Proactively target and engage families with complex support needs, for example, Families First Payment by Results and families affected by substance misuse, domestic abuse and parental mental health based on data • To provide and supervise high quality case work with individual families • To deliver Payment By Results targets across the area through improved family outcomes • Co-deliver targeted parenting groups as and when agreed as part of area team and caseload planning 	<p>Intensive Family Support Team:</p> <ul style="list-style-type: none"> • Family Group Conferencing • Preventing repeat children removed by care proceedings • Preventing entry into care • Intensive home based support to children on child protection plans
	<p>Families First Lead programme:</p> <ul style="list-style-type: none"> • ‘Think Family’ Workforce development • Signs of Safety lead • Oversight and delivery of Families First Outcome Plan • Link to commissioned Key Workers service • Links to Stronger Families
<p>Short Breaks, inclusion and Specialist Behaviour – support early help around behaviours that challenge, social inclusion, sleep and targeted parenting support.</p>	

APPENDIX 3 – changes to Children’s Centres aligned to the proposed Prevention and Early Help model.

An important consultation message was the Council, working closely with partners and communities should ensure efficient use of buildings in order to maximise funding to frontline delivery. Statutory guidance on Children’s Centres confirms that the focus should be on delivery of a service offer and not necessarily a focus on buildings.

Consultation will take place with partners and communities prior to any proposed changes to children’s centre buildings in the future. Detailed plans relating to the use of the building will:

- maximise use of wider locations in communities;
- ensure a geographical spread of delivery sites across each constituency;
- support continued delivery of midwifery & health visiting services across the centres and develop family hubs;
- seek to reduce reliance on buildings and release as much money as possible into front line workers.

Area	Sites	Outcome following consultation
West	Farcliffe and Lilycroft Children’s Centre	Well used centre in large part due to cluster teams and childcare on-site – potential for more co-location. Maintain present designation at this stage.
	Princeville Children’s Centre	Implement proposed change to outreach base.
East	Parkland Children’s Centre	Implement proposed change to outreach base.
South	Wyke Children’s Centre	Implement proposed change to outreach base.
	Tyersal Children’s Centre	Implement proposed change to outreach base.
	Bierley ‘The Shed’ Children’s Centre	Implement proposed move to outreach base.
ShIPLEY	Hirst Wood Children’s Centre	Implement proposed change to outreach base.
Keighley	Highfield Children’s Centre	Implement proposed change to outreach base.



**City of Bradford Metropolitan District Council
Evaluation of Prevention and Early Help Consultation
February 2018**

www.peopletoo.co.uk

Contents

1. Introduction and Context	35
2. Executive Summary	35
3. Summary of Proposals	38
4. Summary of Consultation Activity	40
5. Feedback about the Consultation Process and Requests for Clarification and Further Information.....	41
6. Summary of the Key Findings.....	43
9. Alternative Models of Delivery and Suggestions	65
10. Appendices	66

1. Introduction and Context

Building on our work with the Council and its partners to undertake a review of Prevention and Early Intervention in Bradford in 2017, Peopletoo were asked by the Council to submit a proposal to undertake an analysis of the Prevention and Early Help consultation that was undertaken by Children’s Services between November 2017 and February 2018.

The consultation gained the views of residents, partners and affected teams through a variety of methods, including an online questionnaire, consultation events, and both email and freepost facility, and ended on the 12th February 2018.

This report represents an overview analysis of the findings of the consultation.

Peopletoo would like to thank the City of Bradford Metropolitan District Council for the opportunity to undertake this work.

2. Executive Summary

The consultation on proposals for a change to the way that Bradford MDC delivers its Prevention and Early Help Offer for children, young people and their families elicited a significant response from the public, partner agencies and staff. In summary, there were 1189 responses to the consultation questionnaire, over 200 members of the public attending one a number of public consultation sessions, in addition to a large number of staff and partners attending events or discussing the proposals at existing meetings.

The Youth Service also undertook a series of events with young people which delivered the consultation questions as part of a discussion based on case study scenarios. In total there were 19 focus groups with young people involving a total of 115 young people.

There were also over 174 responses via email, with a number attaching detailed responses in the form of reports and implying consultation events organised outside of the Council process which will have engaged many more. The responses also included an alternative model of delivery based on a Family Hub Model around schools, a “Save Bradford Children’s Centres” petition with 2,508 signatures, and representation from the Traveller Community.

Overall, responses received from young people were very supportive of the principles of the proposals, with particular reference to the Key Worker approach and the locality way of working. Where there were concerns, these were predominantly from professionals and partners around the resource capacity to deliver the model, and from parents who had concerns about losing Children's Centre provision. There was concern about the impact of a reduction in services within the proposals given that Bradford has a growing population of young people which may increase the need for services and lead to some needs being missed.

Of note is that 79% of respondents to the consultation questionnaire stated that they either "strongly disagree" or "disagree" with the key, overarching proposal to create an integrated Prevention and Early Help Service for 0-19-year olds (25 for young people with special educational needs and/or disabilities), and the level and nature of the concerns were consistent across events and other responses. However, a more detailed analysis highlights three important factors:

- Firstly, an analysis of consultation evidence provided also shows a marked difference between respondents to the questionnaire and those who attended events, with the former being more negative about proposals than the latter, where there would have been more opportunity for clarifications and questions.
- Secondly, that many respondents whose comments implied that they disagreed with the proposals, expressed comments that predominantly disagreed with the principle of budget reductions, rather than the model itself which was the primary subject of the question, and this will have impacted on this figure.
- Finally, there was a significant change in this figure within the last week of the consultation, which coincided with a strong representation by those in support of Children's Centres in this final stage. Before this, 60% of overall respondents strongly agreed or agreed with the proposals.

The predominant reasons for concerns about the proposed model itself were threefold:

- Firstly, that whilst there was support for some elements of the proposal, the fact that it is accompanied with a proposed 47-51% reduction in staffing resource to deliver was felt to be unrealistic.
- Secondly, that those staff that remained would be expected to work across too wide an age range, diluting the skills and experience that they may have with a particular age group and not providing families with the specialisms that they needed.
- Finally, the impact of the changes on the Early Years agenda, and in particular the impact upon the Children's Centre offer.

The ratios in relation to a number of the elements that support the proposed model are more mixed.

For example, 61% are in favour of an approach that prioritises those more in need of support, though some clarification is sought about what this means in practice and whether it will be solely focussed on the most deprived neighbourhoods only rather than also supporting those with needs that know no geographical or social boundaries, such as mental health, domestic abuse and the challenges that adolescence can bring.

More people disagree with the locality approach (44%) than agree (36%), whilst the key worker approach is equal between both agree and disagree at 41%.

This therefore suggests that there is much more balanced view about the key elements of the proposed approach, and that it is the three key concerns about the overall change to a 0-19 service driving the 79% that disagree with the overall vision, notwithstanding the point above about some using this initial question to express dissatisfaction about budget reductions.

There was also support for the People Can concept, with a number of suggestions as to how this could be implemented and demonstrating a strong understanding of what it was trying to do.

Some comments were also made about the consultation process, with suggestions that not enough detailed information was given about the proposals to be able to fully comment, that some of the venues where consultation events were held were not accessible enough, and that consultation documentation should have been provided in other languages.

It is the conclusion of this evaluation that, notwithstanding these comments, City of Bradford City MDC has made a significant effort to consult as openly and transparently as possible, through various methods and promoted regularly through social media, and this is reflected in the considerable response. Whilst the proposals do not contain all the detail that will be required to deliver them at this stage, it should be remembered that this consultation was designed to gain people's views on the principles of the proposed change, and that the Council is committed to continuous "co -design" any further detail.

However, going forward, it is clear that staff, partners and the public have used the opportunity that this consultation has given them to give some clear messages to the Council which it needs to consider should it progress with its overall vision proposed vision, proposed model of delivery and priority functions for delivery as set out in the November Executive Report. These stakeholders should now be offered the opportunity to co-design this detail in such a way that makes the best use of a continued reduction in resource that ultimately lies outside of the Council's control.

In summary, key areas for further consideration for the Council and key partners as a result of this consultation are:

- The need to continue to communicate the financial position that has been imposed upon the Council which requires them to try to mitigate reductions in service to use what resource remains in the most effective way. In other words, that the Council is not choosing to make reductions to Prevention and Early Help but must find the most impactful way of using its reduced resource.
- The further co-design and detail as to how the model can work on the proposed reduced staffing across what are perceived to be wide locality areas.
- The further co-design and detail as to what a targeted approach looks like, and how the need to focus on areas that social research tells us are more likely to create need is balanced with the fact that some needs transcend geographical and social boundaries.
- The further co-design and detail of the Key Worker role, clarifying that this role is not about being a specialist in every discipline but a one, trusted point of contact that can broker for specialist support.

- Notwithstanding this, the detail of how the Key Worker role would be assisted to develop the required knowledge across the age range, and what transitional arrangements to enable time for new expertise to be built up.
- How the overall strategy for a 0-19 service will prioritise its resource to the key points in a family's life pathway when they are most likely to need the support, for example in the Early Years or at adolescence, without disregarding the fact that needs can occur at any time.
- How to work with the local communities to address the significant anxiety around the reduction in Early Years support delivered by Children's Centres.
- The approach to providing families with quality, up to date information, including it as a key element of any practitioner's role to make sure that they themselves are well informed in order to inform families, and maximising the use of social media as a way of keeping this information "live".
- The need to ensure that locality teams work closely with the Voluntary and Community Sector and key partners to create an overall Prevention and Early Help Offer within communities and maximise the total area resource.
- The further development of the People Can concept, picking up the constructive suggestions submitted as part of this consultation.
- The development of a strategy around buildings and their use, which takes account of other community venues and seeks the best delivery venues that will maximise accessibility and uptake by the public. This should also take account of other proposals in other parts of the council and in health services to develop other hubs and ensure any developments are co-ordinated.

3.1 Summary of Proposals

This consultation focussed on a proposed new way of delivering Prevention and Early Help in Children's Services within the context of budget pressures, whereby the resources that the Council will have to spend on areas covered by this consultation will reduce by £13.3m or more than one third, from £37.1m in 2016/17 to £23.8m in 2020.

Delivery of the proposed new Prevention and Early Help model would include a combination of a small group of central services and four new Prevention and Early Help teams. The proposed four new 0-19 Prevention and Early Help teams would target those areas with the poorest outcomes within the four areas of Keighley and Shipley (combined), and then East, West and South of the City.

Each proposed new area team would deliver:

- The children's centre core offer to children under 5 and their families
- Targeted key work with individual children and families (Families First)
- Parenting support
- Quality and take up of early education and free childcare
- Education attendance
- Diversity and cohesion

The following services would be delivered centrally:

- The Early Help Gateway, a single point of contact for advice on Prevention and Early Help (incorporating Families Information Service).
- Oversight of education safeguarding including children missing from education.

- Specialist behaviour support and inclusion for children with additional needs.
- Short breaks for disabled children.
- Intensive family support to prevent children coming into care.
- Youth offending services.
- Service support, for example admin, finance and performance management.

The proposed model also includes the Council's plans to recommission health visiting, school nursing and oral health services and for these services to be fully joined up and integrated with the proposed four area Prevention and Early Help teams. These services would include both universal and targeted services focused on the Healthy Child programme which will include high impact areas and the mandated health checks for children and families.

The proposed model would also align with the Council's youth services and ward partnerships which would continue to be managed within the Council's Place Services.

The proposal means that the children's centre core offer would be delivered through the proposed four 0-19 Prevention and Early Help teams rather than the existing model of delivery through the separate and standalone teams. Services for babies, children and young people would continue to be delivered through a range of local sites including the existing children's centre buildings. There were no proposals to close any individual children's centre buildings. It was proposed that the following buildings become outreach bases. These would still be expected to deliver a minimum of 8 hours of activities per week with babies, children and families:

189
39

- Hirst Wood
- Highfield
- Parkland
- Farcliffe & Lilycroft
- Princeville
- Bierley
- Tyersal
- Wyke

Short Breaks and Specialist Behaviour Support for Disabled Children

The proposals would see responsibility for short breaks and specialist behaviour support for disabled children move from Specialist Services to the proposed

SEND Services. The proposals would also see responsibility for assessed contact (for children subject to care proceedings) remaining within Children’s Specialist Services. The Council would continue with plans to buy in services related to short breaks, Families First key workers and other targeted services.

4. Summary of Consultation Activity

This section reports upon the volume of response by method and the split of responses / attendees at events by the capacity / context where known in which people responded.

Method	Total Number Attending / Responding	% Ratio of Responses / Attendees
Consultation Events	102 events including: 27 Public Sessions 32 Staff / Elected Member Sessions 15 Partner Sessions 19 Sessions with Young People facilitated by the Youth Service involving 115 young people 28 presentations to Partnership / Board Meetings including Area Committees 174 responses by email	201 members of the public attended a public session, of which 25 identified as young people. 40 partners attended a partners’ session. Over 400 staff at staff sessions and 12 elected members
Online Questionnaire	1189 respondents	Not all those that completed the questionnaire answered this question; those that did could tick all categories that applied): 376 Parent / Carer (65%) 239 Staff (25.6%) 97 Education Professional (10.4%) 82 Health Professional (8.8%) 40 Voluntary and Community Sector (4.2%) 36 Children and Young People (3.8%) 4 Elected Members (0.4%) 57 Other (6.1%)
Petition	Petition entitled “Save Bradford Children’s Centres” with a total of 2508 signatures submitted by Bradford Families Against Children’s Services Cuts	It is not possible to establish the age ratio of respondents. However, whilst the majority of the 235 hard copy signatures have a Bradford postcode, it is apparent

		from the 2,073 online signatures that a significant proportion of these live outside of Bradford – 53% outside of Bradford with a further 19.6% unknown.
Submission from the Traveller Community	Copy of a letter signed by 9 members of the Traveller Community in which they questioned why dedicated consultation activity was not undertaken with them and in which they shared their views on the proposal.	It is not possible to establish the age ratio of respondents.

5. Feedback about the Consultation Process and Requests for Clarification and Further Information

The Consultation Process

Several comments across the various mediums of consultation used commented upon the consultation process itself. The majority of these questioned how information and feedback from the consultations would be shared with attendees, with some asking if the presentations would be shared online, and one group requesting to see an interim/progress report on the consultation findings. There was a concern raised that the purpose of the consultations may not have been communicated clearly enough to some specific groups – for example parents who attend Children’s Centres, Children’s Centre staff and the Traveller community - potentially leading to their disengagement from the process. It was also suggested that some of the venues for the consultation events were not easily accessible for the public, and that the methods used were not available in a range of languages.

There was a wide range of comments and questions relating to the extent to which local partners - the voluntary sector, police, education and health – either had been or will be involved in the design and operation of the proposed model to date. Several of those who attended consultation events felt that there were further opportunities to involve these organisations in the co-design of an Early Help model that had not been maximised so far.

In response to this feedback, the Council arranged additional and attended further meetings, in order to ensure a wide and accessible reach. These were targeted at community groups, ensuring crèches were available to support parents, and ensuring that translators were available where necessary.

A session facilitated by the Youth Service was well received by young people, as it explained the concept of Early Help including via a case study to enable the young people to have a clear understanding about the proposals.

The desire to co-design and requests for clarification and operational detail

Within responses to both the online questionnaire and from consultation events, there were a number of references to the requirement of further information to support an informed response to the proposals subject to consultation.

These focussed predominantly on requiring a more detailed, practical explanation about how the proposed model will work in practice, as well as further clarification around what evidence there is to suggest that the proposed model will achieve its aims.

Some suggested that this meant that the approach to consultation was not as open and transparent as it should be, that the online questionnaire asked leading questions with a view to eliciting a desired response, and that this implied that decisions had already been made.

There were also requests for further information about the rationale and decision-making process applied by the Council when deciding which Children's Centres would have reduced hours. There was uncertainty about the levels of support which would be provided within this proposal in areas outside of the 10 wards which would receive targeted support. Furthermore, some attendees expressed concerns that the proposals appear to include a reduction in the hours of support provided by Children's Centres in some of the most deprived areas of Bradford (with specific suggestions that the areas of Bierley, Tyersal, and Royds ward would need the full 25 hours of provision).

Further clarifications required included:

- Why the 'Low Income' category in the Equalities Impact Assessment is described as low risk
- The evidence that suggests that the Council is best placed to provide all services
- Clarity around which programmes / services the Council won't be delivering anymore
- How locality working will affect current systems in place where lead practitioners for safeguarding share concerns or seek advice for possible referrals
- When the changes come into effect
- Where staff will be based
- What the Council means by 'prevention' and the 'core offer'
-

It is the conclusion of this independent evaluation that that the next stages of development and engagement should clarify the rationale for the level of detail given, emphasising that, depending on the responses from key stakeholders and the public, the Council is committed to a process of "co-design".

A number of responses suggested a desire to co-design the detail to any further developments of proposals. One group of respondents articulated this as follows: "A co-design of prevention and early help services – one that looks at all the available resource (financial, people, assets) and works out how it can be best be used and the potential for increased partnership and collaboration. We are aware of initial discussions and together with other forums of the District Assembly will be keen to progress any genuine partnership opportunity and approach that seeks to:

- Explore different ways of working and build on all the assets in the community
- Involves the community from the outset and can allow services to be shaped by them.
- Is determined to ensure there is appropriate resourcing for alternative models
- Has realistic expectations of what communities can "take on" and the support that will be needed to facilitate this

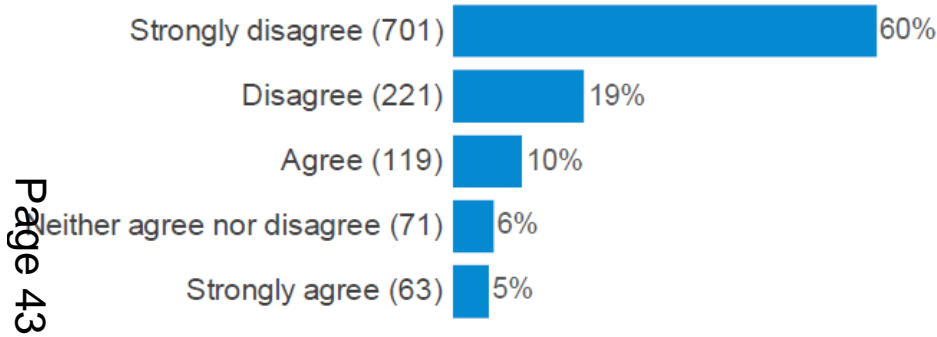
- Takes account of the resource and time commitment to developing and maintaining partnership working”.

6. Summary of the Key Findings

The following findings are a collation of responses via all methods used but using the questions in the online questionnaire as a structure.

6.1 To what extent do you agree or disagree with Bradford Council’s overall proposal to create an integrated Prevention and Early Help Service for 0 – 19-year olds (25 for young people with special educational needs and/or disabilities)?

Consultation Questionnaire Result:



79% of respondents to this question in the consultation questionnaire stated that they either “disagree” or “strongly disagree” with this overall proposal.

Summary of Responses Across Consultation Methods

Support for Proposal

- Overwhelmingly, respondents via all methods of consultation supported the concept of Prevention and Early Help; no respondents felt that Prevention and Early Help should not be invested in.
- Those that supported the overall proposal to create an integrated Prevention and Early Help Service for 0-19-year olds highlighted the potential for reduced duplication of service and the potential for better co-ordination of health and social care services.
- A number of responses were satisfied that the proposals supported the “Think Family” approach that recognised that families have children across age ranges, and that a whole family approach enabled the family’s needs to be seen as a whole rather than separately for each family member. The proposal was also seen as a more seamless pathway of services through childhood rather than a series of age defined transitions.

- Some respondents recognised the need to deliver value for money, and that these proposals supported this given budget restraints.
- Whilst supporting the proposals in principle, some respondents felt it was important to ensure that the service offer was complemented by a maximisation of what the Voluntary and Community Sector has to offer to ensure further integration and best use of resources.
- Further “agreements in principle” were caveated with a desire to see a degree of prioritisation within the model. For example, whilst the service is proposed to be 0-19, many respondents were keen to see an emphasis on Early Years due to the impact (both positive and negative) of a child’s experience at this age. One respondent was keen to include “pre-birth” within the age range.
- Some responses supported the model of integration including health visitors completely integrated into area-based Prevention and Early Help teams. There was a challenge to this elsewhere, however, in that the current benefits of the attachment of Health Visitors to GPs would need to be preserved.
- One response from the Voluntary and Community Sector supported the 0-19 principle but suggested a more defined emphasis on various age ranges within this.

Concerns Raised

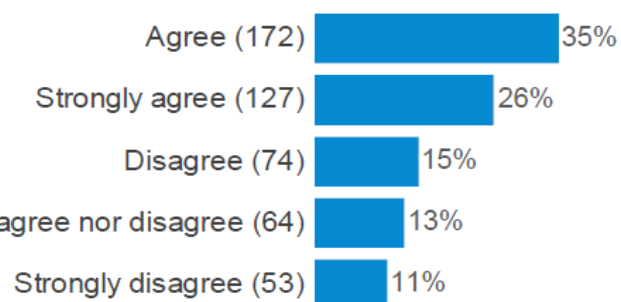
- The predominant concern that was raised across the various consultation methods was about how deliverable the service would be given the proposed reduction in staffing. There was a concern about this creating high caseloads across a large geographic area that would mean less quality time with families that need support.
- Responses highlighted a strong commitment to Early Help and Prevention but concern that the proposals were perceived as a further reduction and dilution of service delivery, and that there would be an impact on the demand for more acute services. A number of respondents were satisfied with the current model and did not want this to change.
- There was considerable concern that the age range of the service would lead to a dilution of Early Years work in particular, given the importance of this in setting children up for positive outcomes in later life.
- In particular, there were a number of comments in this section expressing concern about the reduction in Children’s Centre delivery. Many stated that Children’s Centres were seen as vital parts of the community and the benefits that families had gained from universal access, such as stay and play, cook and eat, baby massage. There was a concern at losing these.
- There was a concern about the impact of the changes given the increasing population of children and young people in Bradford.
- There were a number of concerns regarding the wide age range of the service, and whether a practitioner would have the required skills and experience to work across the age range. Some questioned how families would be supported during the transition to the new service arrangements.
- A number of respondents perceived the “key worker” role to mean that one worker would be expected to deliver all interventions, and that families would no longer have access to a range of specialist services when required, and this caused concern.
- One respondent preferred the service to emphasise “Family Support” rather than “Prevention” as it was felt that not only did this describe the offer more accurately but was also sounded more use friendly.

- One group of respondents had a concern that the remodelling of Local Authority services is taking place in isolation and without a “Whole System Approach”. It was felt that re-modelling in isolation would continue to perpetuate inefficiencies and that only a whole system approach to remodelling would achieve the best outcomes for children, young people and families.

6.2 How much do you agree or disagree with the following statement? “It is important to target our resources to those more vulnerable children, young people and families with the poorest outcomes”.

Consultation Questionnaire Result:

Page 45



61% of respondents to this question in the consultation questionnaire stated that they “agree” or “strongly agree” with this proposal.

Summary of Responses Across Consultation Methods

Support for Proposal

- Respondents who agreed with this proposal did so on the basis that it made the best use of resources and focussed support on families most in need.
- Where there was support in principle for taking a targeted approach, this was caveated with a desire to see an effective approach to the provision of information and advice that families could access when required, to prevent an escalation of need.
- Further “agreements in principle” stated a need to still provide a degree of “universalism” in order to identify families whose needs may otherwise not be known – generally there was a question about how the identification of families needing support would work, particularly those that did not fall more typically within the definition of “vulnerable”.

Concerns Raised

- Many of those that disagreed with this proposal did so on the basis that they felt that services should be available to all as and when they needed them.
- One respondent suggested a more balanced approach should be taken that also supported universally available ‘first rung’ engagement activities that facilitate greater family resilience.
- Linked to this, a large number of respondents were concerned about how the needs of children, young people and their families outside of the target wards would be met. For example, it was stated that families from all backgrounds can become vulnerable to issues that require early help, such as mental health and domestic abuse, but that the proposals stated a focus on wards with the poorest outcomes. Furthermore, some communities with particular needs may be either transient or live across a range of wards, and there was a perceived risk if these communities’ needs were not addressed as a whole (examples given included the gypsy / traveller and Eastern European communities).
- One group of respondents expressed a concern that they perceived targeted support to remain with what felt like a universal “Early Help” service and felt that this risked diluting the clarity about what targeted support was, and that the threshold for targeted support should be both clearer and closer to the cusp of social care thresholds to be sure that it was impacting on those most in need.

Page 46

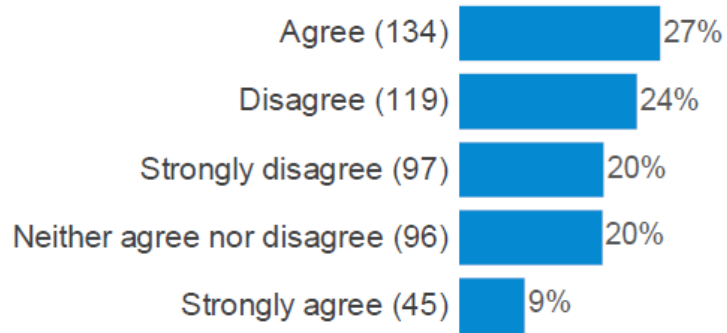
There were a number of comments in this section expressing concern about the reduction in Children’s Centre delivery and the impact that this would have on being able to identify such families or to provide support to new parents at a potentially vulnerable stage in life regardless of socio – economic status.

Overall, there were concerns about children “slipping through the net” through a targeted approach.

- There was a concern that services would become stigmatised as for “problem families” if the focus of the service was not articulated carefully.
- There was a concern that the proposals for the Early Help Gateway to be integrated with Family Information Service were not detailed and hence unclear how this fits into Children’s Services’ ‘front door’. As FIS’s current role is predominantly to direct the two-year-old offer and a universal service, this is felt to be quite different from the function of the Gateway role.

6.3 It is proposed that some services will continue to be delivered centrally but the majority would be based within local communities (services close to families and the community). Do you agree with the Council’s proposals to deliver services across four areas (Keighley/Shipley combined, East, West and South)?

Consultation Questionnaire Result:



44% respondents to this question in the consultation questionnaire stated that they “disagree” or “strongly disagree” with this proposal 36% of respondents to this question stated that they “agree” or “strongly agree” with this proposal.

Summary of Responses

Summary of Responses Across Consultation Methods

Support for Proposal

- Young people supported the idea of having services delivered locally but also favoured a wide variety of venues being used where young people may prefer a degree of neutrality or privacy.
- Where locality working was supported, this was on the basis of key workers being able to develop a detailed knowledge of both the needs and resources available within that locality.
- Linked to this, key workers with locally based knowledge would be able to identify where there is duplication or gaps in provision, and be able to act accordingly.
- One group of respondents agreed in principle with the idea of Locality Working but questioned how this would link with social care.

- It was felt that this model would benefit from including community development as an element, focussing on building community resilience.
- A couple of groups supported the proposal but suggested a review of partners' / community buildings and assets in Bradford. They suggested a detailed strategy be developed around buildings and their use, which takes account of other community venues and seeks the best delivery venues that will maximise accessibility and uptake by the public.
- One group supported the proposal in principle but suggested that clear referral pathways are established and understood by all in the new teams and integrated into existing pathways e.g. Integrated Care Pathway.
- Support in principle also included the suggestion that full integration of services in a locality will require 'day-to-day' integration, rather than occasional joint board meetings/integration solely at the senior level.

Concerns Raised

- Where there was agreement in principle to the proposal to deliver many services within local communities, this was caveated with a desire to know how local these services would actually be, with a concern about how far some families would be able or willing to travel to access services.
- Linked to this, some perceived locality working to mean that all services would be delivered from one locality hub, making access to such services harder for families. Many respondents expressed a desire to see Children's Centres be used as a hub local to their area, or, at the very least, services delivered on an outreach basis.
- Some respondents felt that the opportunity to involve schools more as part of a locality model had yet to be explored within the proposals. One response included an alternative model based on schools and school clusters being the focal point of a Family Hub Model.
- Some respondents highlighted that there are differing needs within these localities which need to be factored in to how services were delivered.
- Respondents who disagreed with this approach felt that the locality areas were too big when combined with the proposed reduction in staffing, and the impact that this would have on the capacity to support families within these areas, particularly when factoring in the increased travel time for key workers. Some alluded to a locality model having been tried before and not worked.
- For similar reasons, a number of respondents disagreed with Keighley and Shipley being classed as one locality due to the size of this footprint.
- There was a concern about how more transient families or communities would be supported as they moved areas.

6.4 Do you agree that joining up services (which are currently delivered separately) to provide one key worker per family who can co-ordinate and provide the support is a better model of approach?

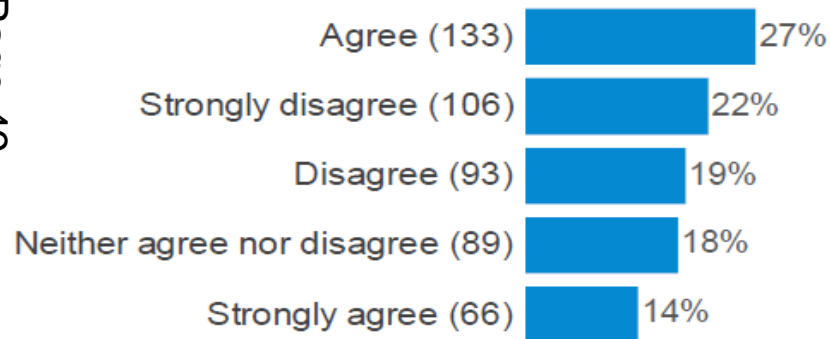
Consultation Questionnaire Result:

41% respondents to this question in the consultation questionnaire stated that they “disagree” or “strongly disagree” with this proposal whilst 41% of respondents to this question stated that they “agree” or “strongly agree”.

Summary of Responses Across Consultation Methods

Support for Proposal

Page 49



- Young people particularly supported this proposal as it reduced the amount of times that they would be asked the same questions. One young person stated “Too many specialists scare people. Too many plans are confusing for everyone, no - one knows what’s happening and workers are trying to do different things with the same person”.
- Where there was other agreement to this proposal, the common benefit that was perceived was the better co-ordination of services through one worker rather than having to deal with a range of different services alone. Many respondents cited the Common Assessment process, Children’s Centres and Health Visiting Services as examples of this approach that this approach could be built upon.
- Other benefits included the capacity to build a trusting relationship with a family and to be able to see the family’s needs as a whole.

- One young person expressed the benefit of having a key worker who could connect them with activities that they would not have otherwise known about.

Concerns Raised

- Some of the concerns raised related to a perception of a Key Worker role to be that this would be the only professional working with the family, and that they would not have the required skills and expertise to be able to address every issue. Some comments referenced similar concerns to those raised about the move to a 0-19 service in general – namely that a key worker would not necessarily have the skills or knowledge to work across the age range.
- It was also stated that whilst key workers could be trained in other subject areas, true expertise takes longer to develop.
- There was a concern about continuity of support for families should a key worker leave or be on a period of sickness absence, exacerbated by the reduction in overall staffing; a couple of respondents suggested that a second key worker be attached to a family at a subsidiary level or as a “buddy” would be beneficial so that any necessary handover would be smoother.
- Some respondents agreed in principle on the understanding that:
 - Key workers were suitably trained and that effective supervision was in place
 - Young people were keen to preserve the right to privacy of an individual within the family should be respected within the context of a “whole family” approach
 - Sufficient community services remained for the key worker to be able to connect families to
 - The expectations of families were addressed e.g. that the key worker was not expected to be an expert in every area but act as a broker for specialist support
 - Where there was relationship breakdown between the key worker and the family, that the family were able to request a change or at the very least a second opinion

6.5 Please give us your comments on how can we make sure the proposed teams / services encourage and support the People Can approach:

- Be neighbourly – carry out small, informal, everyday acts of kindness
- Community action – create a new group, activity or event with like-minded people
- Volunteer – devote some of your time to helping others
- Raise money – use your skills to raise funds for a community project

Summary of Responses Across Consultation Methods

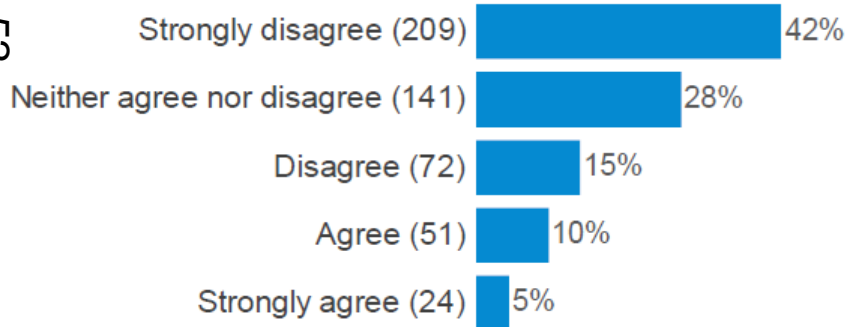
- Suggestions for the key ways of promoting the People Can approach included:
 - Promotion via Community Events.
 - Promotion via existing community and faith groups that already deliver the concept in practice if not under the banner of “People Can”.
 - The identification of key, passionate individuals from communities who can be a voice, be proactive, bridge gaps and engage those around them. However, care must be taken that they do not become saturated with expectation or become the only focal point, as by equal measure some of these individuals can be divisive within their communities.
 - Identifying “community mentors” and opportunities for positive peer relationships who can support families with particular needs. Young people suggested the use of wider family or helpful adults to support them when they needed help or someone to talk to outside of their immediate family. They extended this concept to include linking parents up with other parents who have experienced and overcome similar challenges (e.g. the first stages of parenting, adolescent behaviour). One young person described this as “pairing up” families.
 - Develop capacity building strategies to support parent led initiatives in areas that are seeing a reduced / no service.
 - Celebration of successful examples.
 - Encouraging those who are unable to commit time to pooling resources such as tools and equipment that the community could borrow.
 - Promoting volunteering as a means of gaining work experience for young people or those who are unemployed as a gateway into work, or those who are socially isolated as a way of connecting to their community. Young people also saw volunteering as a way of them gaining independence and self - esteem.
 - Making better use of community buildings where People Can activities can be delivered from.
 - The use of social media to create peer support and community action.
- There was a concern that the People Can approach was a way of attempting to replace paid workers with volunteers, and that this raised issues around quality of delivery, safe practice, consistency, and infrastructure to support volunteers.

- There was more support for People Can where the neighbourliness and community action elements of it were understood.
- Some respondents felt that the People Can concept would be more successful in some areas than others based on the level of community spirit or community action that already existed.
- A number of respondents agreed with the People Can approach but emphasised that it would need time to be embedded, and that it should be given time to become so and not pulled within a couple of years and then be seen as another initiative that has “failed”. This makes it harder to attempt to do something similar in the future.
- One group of respondents supported the People Can concept but stated that a level of investment is needed to drive it, particularly in areas where it may be slow to gain momentum, especially if these are areas that particularly need it.

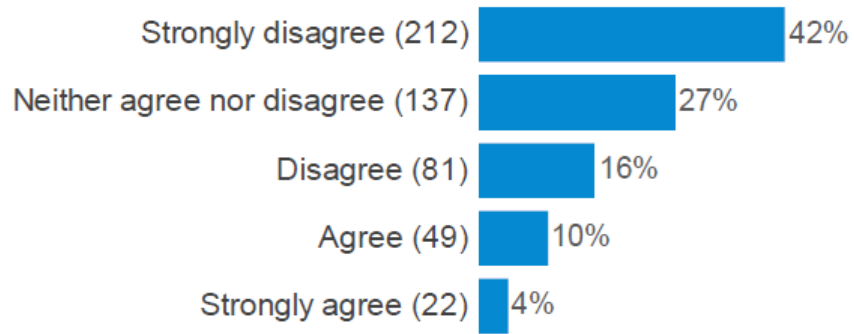
6.6 Based on analysis of the geographical spread and usage of Children Centres, it is proposed that eight buildings will become Outreach bases (which are proposed to deliver a minimum of eight hours of activities per week with children and families), do you agree with the proposal to reconfigure these Children Centres?

Hirst Wood

Page 52

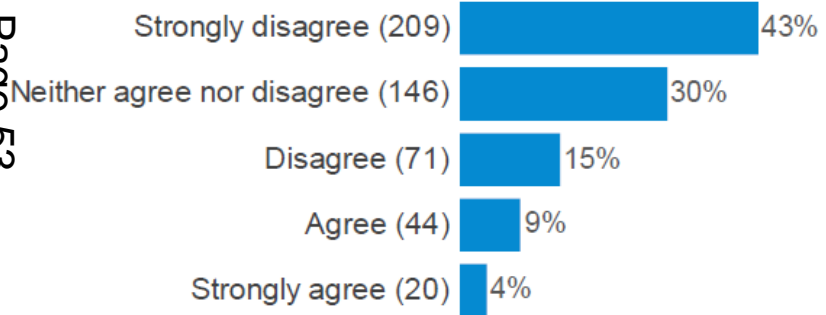


Highfield

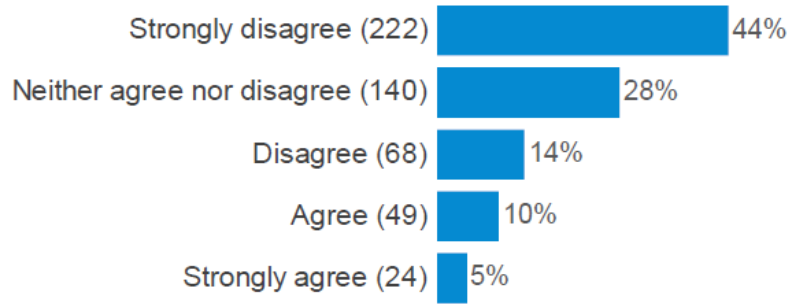


Parkland

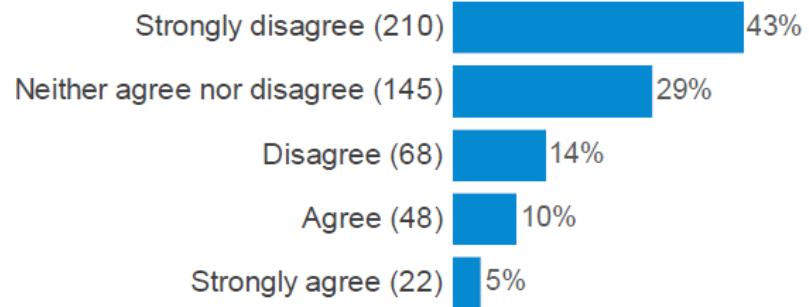
Page 53



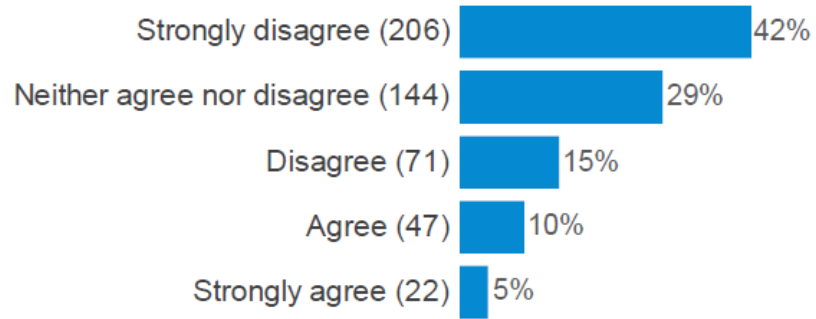
Farcliffe and Lilycroft



Princeville

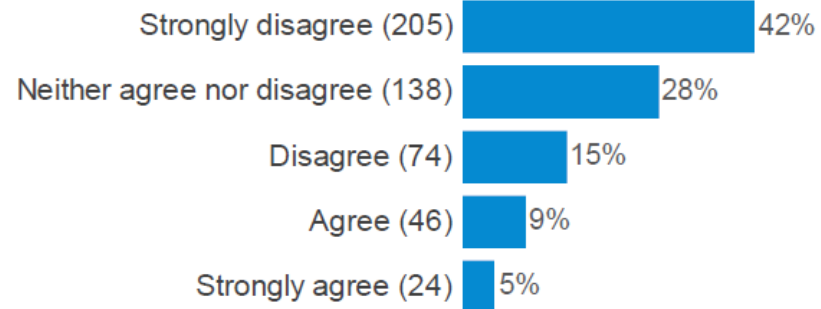


Bierley

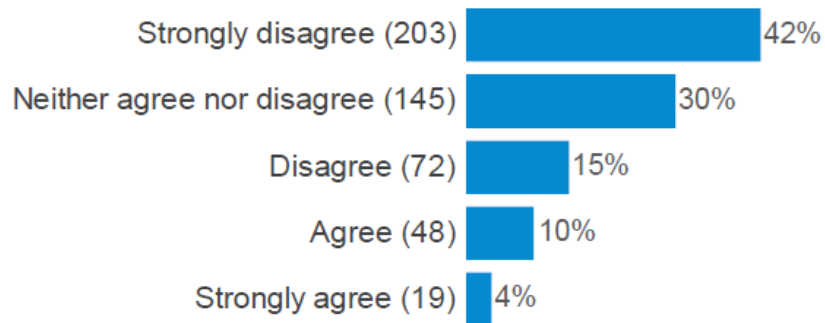


Tyersal

Page 55



Wyke



Summary of Responses in General Across Consultation Methods

Support for Proposal

- Support for this proposal was based upon a value for money approach where some centres were not as well used as others or where there was duplication of activity in communities or other venues / services that could be used.
- Some respondents saw an opportunity for the outreach centres to be used at other times of the week by other services (for example health services and community groups). Some examples were given where this already happens e.g. health visiting and school nursing.
 - Furthermore, it was felt that there were opportunities for the greater usage by schools where centres were based on school sites and the 2-year-old offer was being delivered.
 - Similarly, an agreement in principle was based on key workers actively engaging with the Voluntary and Community sector to make best use of buildings and provide support to people outside of the centres' opening hours.
 - Some respondents suggested that not all services should be centre based and that this proposal supported the concept of the Children's Centre / Early Years offer being service need rather than building focussed, and hence could be delivered across different venues. Some respondents suggested that greater collaboration between schools and Children's Centres would also support this approach and create a more joined up approach. One stated that "Focus on a service delivery model should be responsive to community need and can be delivered flexibly to meet the need of families and not restricted to delivery from core buildings".
 - One stated that this proposal could go further and reduce the costs of building management and maintenance with a focus on maximising opportunities for capacity building within the community by supporting community venues.

Concerns Raised

Many respondents expressed concern about the reduction of the Children's Centre offer. Key reasons for this included:

- The impact on long term outcomes for children and families
- The impact on support for new parents
- The impact on positive relationships built with the community
- The loss of a hub in the community
- Accessibility to other centres for families with limited or no transport
- Underuse of buildings and facilities
- Access for schools to support for families where centres are based on school sites

Other concerns included:

- 8 hours' opening for all of these centres was felt to be an arbitrary number and based on usage rather than an individual communities' needs. In line with this, there was a request that the rationale for these centres in particular to become outreach centres to be made known. There was a suggestion that the Quality Support Officer Team remain within the central structure rather than allocated to localities, allowing them to continue to have strong links with other central services such as the Sufficiency Team, Early Years Officers, Families Information Service and Early Education Fund Officers.

Page 57

Comments Relating to Particular Centres

(please note that some of these comments are contradictory)

- "Farcliffe is a community hub and is well used".
- "Farcliffe is our second busiest centre. It is centrally located and accessible. It is very unclear how this was chosen".
- "I am very surprised that Farcliffe is on the list when I've visited its always so busy".
- "Highfield is a deprived area, parents need this resource".
- "Highfield should be a hub for the Keighley area".
- "Highfield is a community venue and is well used by that community so think would be difficult for parents to travel to Rainbow"
- "Having worked at Highfield I know how many 'walk in' family support cases come into Highfield and the help that they need and this is daily".
- I agree with Highfield as the centre is not accessed by many local families. Local families attend sessions within other community venues and local schools. The running costs of this building are high and the centre does not meet the needs of local families".

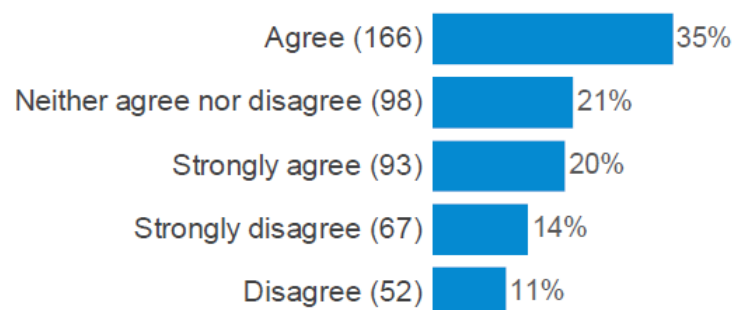
- “Hirst Wood Children's Centre is and am concerned that this is the only centre available for families from the Shipley area”.
- “Parkland is in the middle of Thorpe Edge estate and has a massive potential to become a central resource for families”
- “Parkland is in a highly deprived area and this centre is very important to the families that can access. To remove or shorten then work at this centre or any centre in a deprived area will see more parents accessing social care and children that are not accessing early years education”.
- “Parkland is a very busy children's centre”
- “Princeville children centre ran some amazing courses and catered a lot to vulnerable families; don’t know why they have picked this centre”
- “Princeville Children's Centre is in an underprivileged neighbourhood. Parents and children need this centre to stay open. They use the facilities regularly and consistently”.
- “Wyke is a distinct community and people do not travel as much to the other centres.”

Comments more generally about the use of Children’s Centres

- Many parents spoke passionately about the support that they had received from Children’s Centres and were concerned about losing the positive relationship that they had built up with staff teams.
The “Stay and Play” sessions within Children’s Centres were particularly well regarded in terms of supporting positive play for children and providing peer support for parents.
It was stated that significant investment has been made to build relationships and co-ordinate service delivery and that the Integrated Care Pathway must remain at the heart of Children’s Centre delivery.
- There were several suggestions around how the Council could make better use of its assets and resources, with many of these comments focussing on the use of Children’s Centres and whether the cost of maintaining them could be better used to invest in services in the community via other, existing venues and front-line staff. Some stated that there is a large amount of unused space in some Children’s Centres and that this space could be put to better use or rented out to both save and generate income for the Council.
- However, in terms of actual usage as Children’s Centres, some also noted that those Children’s Centres that have had reduced services within the current core offer are not used by communities effectively due to the part time nature of support service being available to children and families.

6.7 Do you believe we should join up the services that work with and support disabled children and Special Education Needs at home and in the community (for example short breaks) with those services which support those children in and around schools?

Consultation Questionnaire Result:



55% respondents to this question stated that they “agree” or “strongly agree” with this proposal whilst 15% of respondents to this question stated that they “disagree” or “strongly disagree”.

Summary of Responses Across Consultation Methods

Support for Proposal

- Many respondents felt that this proposal would improve continuity and care planning by taking a more holistic approach, and that this would make services clearer and more accessible to parents and carers.
- Other comments in support of this proposal included the potential to speed up diagnosis and access to services.
- The proposal was seen as a way of pooling resources and expertise.

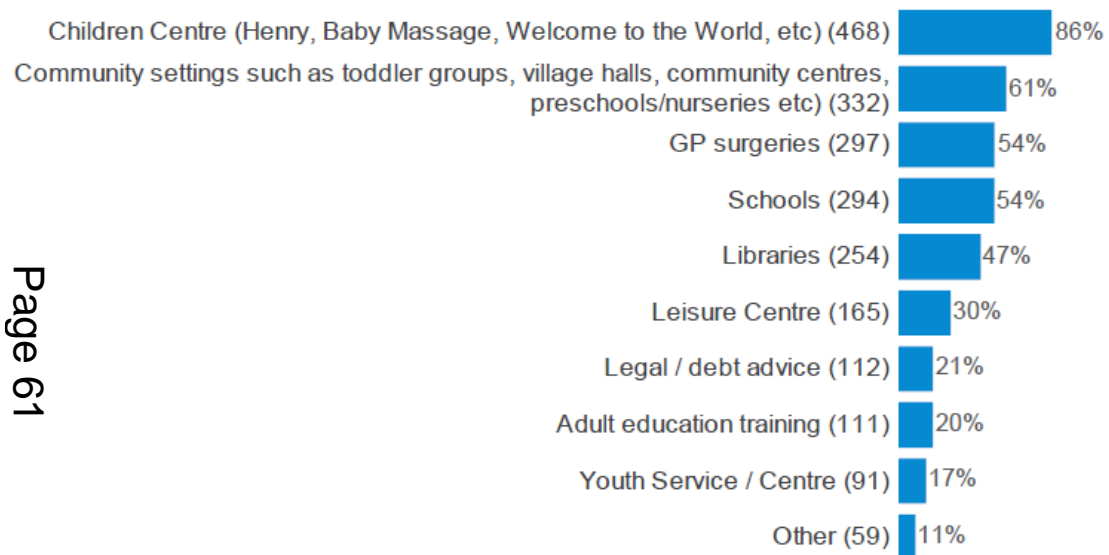
Concerns Raised

- Where there were concerns, these focussed on whether such a merger would mean a dilution of services and loss of specialist support if there was also a reduction in resource.
 - Some of the concerns focussed around the particular vulnerability of this group of children and young people and urged that decisions about service provision remained focussed on the best outcomes for them rather than a cost efficiency exercise.
 - Some respondents referenced the distinction between children with disabilities and those with Special Educational Needs and believed the need of each to be very different – they did not perceive the proposals to make this distinction.
 - Some respondents questioned whether this was a model that had been used and been evidenced as successful elsewhere.
 - There was a concern that the age range of the service was too wide, and that this would stretch the knowledge and expertise of practitioners too widely.
 - Some respondents suggested that services were already stretched and this would only be exacerbated by any further reduction in resource.
 - Some respondents emphasised the need to ensure that children and young people with SEND or disabilities had access to mainstream activities to ensure a good quality of life and a degree of independence.
 - One respondent suggested that available resources should be focussed on the Under 5s as there was otherwise less provision for them, with schools being a major resource that supports the 5+ age range.
- However, other respondent challenged this view, stating that this assumes that the school is sufficiently trained in supporting children with disabilities.

7. Sources of Support and Information

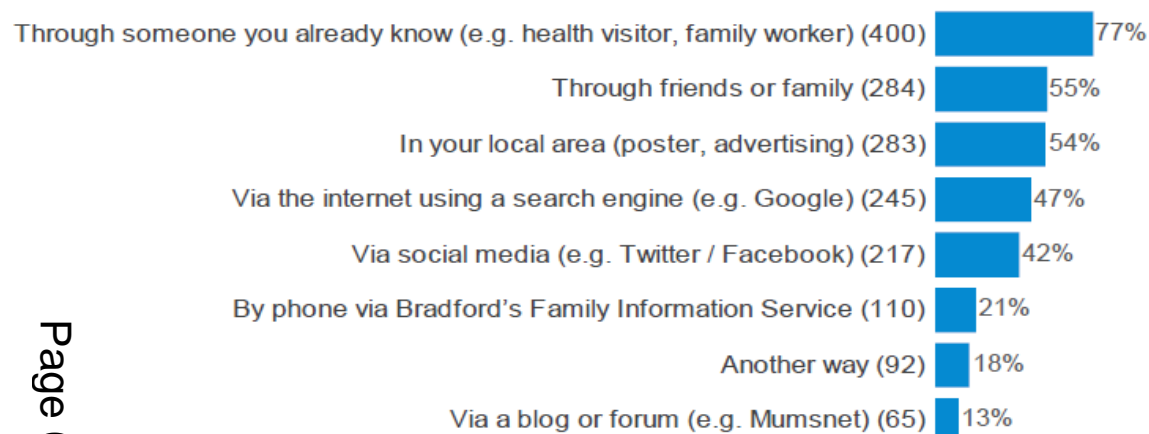
7.1 Do you or have you used any of the following places to obtain / receive support for children and young people?

Consultation Questionnaire Result:



7.2 How do you find out what services are available for children and families?

Consultation Questionnaire Result:

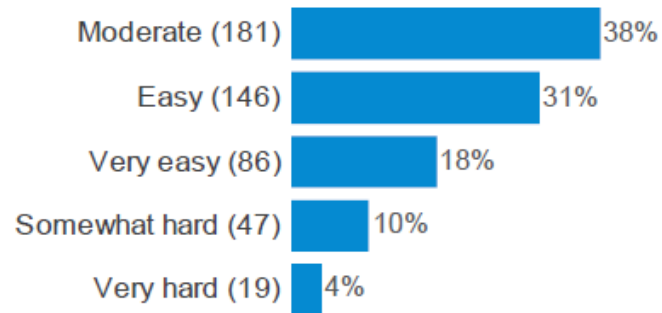


Summary of Responses

- As can be seen from the graph above, word of mouth and the connections that people already had were by far the most prevalent ways that people found out about information.
- Within the comments section to this answer, Children's Centres came out strongly as a source of information.
- Interestingly, more people "googled" for information (47%) or used social media (215) than went direct to the Families Information Service (21%).

7.3 How easy or difficult was it to find the information you needed?

Consultation Questionnaire Result:



Page 6
Summary

As can be seen from the graph above, 49% of respondents found information within the either “easy” or “very easy “, with a further 38% describing it as “moderate”. The “moderate” to “very easy” ranges therefore equate to 87% of respondents.

The comments accompanying this section seemed to have been placed by those who had had more difficulty accessing information. Key points included:

- Some respondents found the Council website difficult to navigate; others stated that the benefit of live feeds such as via social media than standard web-based information that was not always updated. Social media came out strongly as a preferred method of finding out information, though with the caveat that not everybody has access to this.
- Some respondents had not had a positive experience when asking some practitioners for information – the practitioner either did not know this information or offer to find out, or it turned out to be incorrect.
- Overall, whilst word of mouth appeared to be the most effective method of finding out information, those that had found information in this way felt rather fortunate to have done so, and felt that this information should have been more obviously available. Some felt that the proposed move towards a locality model was an opportunity for practitioners to become experts in what is available in their local area and be the focal point for people to access this.

8. Please let us have your comments on the proposals to create an integrated Prevention and Early Help 0-19 (up to 25 with Special Educational Needs/ Disabilities) service as set out in the Executive Report

This section summarises the comments given to the final question in the consultation, which enabled respondents to record any final comments. A number of these are largely the same as contained in an earlier question and have hence been summarised here.

Summary of Comments Across Consultation Methods

Support for Proposals

- There were a number of agreements in principle to the proposals but concerns about the impact of the decrease in staffing to deliver them.
- A number of respondents agreed with the “whole family” approach.
- There was support for services to work together more collaboratively, to pool resources and expertise and wrap a more integrated service around a family.

One respondent used this section to suggest that the proposal to reduce some Children’s Centre provision to outreach was a positive step that could be taken further, suggesting that support to early years would be even more accessible to families if it were delivered via existing community organisations and not just relying on Children’s Centres, which work for some but not for all, and create a perceived reliance on one service of support, and, just as importantly, a pre-occupation with where this service is situated. A “mixed economy” of service provision “two could work together to deliver a range of services that complement one another”.

- Some respondents suggested that schools had a greater role to play in becoming community hubs for families.
- Specific suggestions included introducing a small charge/subscription fee for the use of services, making better use of libraries (which were described as crucial for a child’s development) by making them more ‘community-focussed’, and community-asset transfers. One group also reiterated the proposal highlighted previously of moving some services into schools.

Concerns Raised

- A number of respondents perceived that the primary purpose of the proposals was to save money rather than create a more effective model for Early Help, and disagreed in principle to any reductions in Early Help resource, particularly in Early Years.
- There were concerns about the impact of reducing the resources to deliver Early Help on increased demand in acute services.
- There were concerns about whether practitioners had the skills and knowledge to work across such a wide age range.

- Some expressed a concern that the essential elements of the positive work that had been undertaken would not be sustained within the new model and that these proposals would effectively start from a blank page (at least this was how it was perceived). Linked to this, some felt that the proposals did not acknowledge strongly enough the partnership working that already existed that could be built upon.
- Some respondents queried the difference between the budget reductions of 35% and staffing reductions of 51%, stating that this suggests a disproportionate focus on staffing reductions. In addition, further comments suggested that savings could be made by reducing management and consultation costs – questioning how the Council justifies a 61% cut in practitioners compared to a 51% cut in management.

9. Alternative Models of Delivery and Suggestions

As part of the responses to the Prevention and Early Help consultation, an alternative proposal was submitted on behalf of a number of Nursery Schools. In brief it can be described as:

Family Hub Model

- Frontline delivery through 20 Family Hubs based on clusters of health visitors, nursery school and settings, primary, secondary, and special schools.
- Each school would have a named Family Key Worker from their Family Hub.
- Hubs to be loosely based on the 17 current LAPs (Local Achievement Partnerships) where these are working well. Schools not currently in LAPs to be linked to their nearest Hub. In areas with fewer children or less need there will be a higher number of schools in each Hub. In areas with a high level of need, there may be 2 Hubs within one LAP, or a slightly larger Hub team.
- Staff would be line managed by the Local Authority with strong links to Children’s Social Care.
- Health visitors, school nurses and oral health workers would be co-located within Family Hubs when service is re-commissioned in 2018.
- Family Hubs would be based in existing children’s centres, or in other buildings such as schools where existing centres are too costly or not in the right place.
- Some children’s centres may close, as there are likely to be less costly or more convenient places to deliver services.

Partnership Asset Review

A couple of groups of respondents also suggested a partnership review of partners’ building and assets. It stated:

“The proposals lack a business case around buildings in terms of:

- The viability and practicality of the outreach centres: there is no demonstrable consideration of learning from the previous round of restructure
- Keeping all the centres open in the light of the significant budget reduction
- Developing family and community hubs: there is an assumption that unused capacity can be used for other community capacity. The business case for this is not tested and may vary from locality to locality. In some areas this may be viable but in others there is already sufficient community space available and increased competition could challenge existing locations’ business models.

- Exploring other options for delivery including use of other community buildings and assets.

There needs to be a detailed strategy developed around buildings and their use, which takes account of other community venues and seeks the best delivery venues that will maximise accessibility and uptake by the public. It also needs to take account of other proposals in other parts of the council and in health services to develop other hubs and ensure any developments are co-ordinated”.

10. Appendices

Appendix 1 – The Context In Which People Responded to the Consultation Questionnaire

Appendix 5 – Equalities Impact Assessment

Department	Children's Services	Version no	0.2
Assessed by	Mark Anslow/Maureen Braden	Date created	10 August 2017
Approved by	Judith Kirk	Date approved	
Updated by	Maureen Braden	Date updated	12 March 2018
Final approval		Date signed off	

The Equality Act 2010 requires the Council to have due regard to the need to

- eliminate unlawful discrimination, harassment and victimisation;
- advance equality of opportunity between different groups; and
- foster good relations between different groups

Section 1: What is being assessed?

1.1 Name of proposal to be assessed.

A proposed remodelling of the Prevention and Early Help offer across the District.

1.2 Describe the proposal under assessment and what change it would result in if implemented.

Ensuring effective Prevention and Early Help arrangements for babies, children, young people and families is an essential responsibility and statutory requirement of the Council and its partners.

The way key services are delivered is being transformed; this is due to the need to:

- continue to meet statutory requirements
- ensuring good outcomes for children are supported
- as much resource as possible is deployed to work directly with children, families and communities
- make financial savings required by 2020/21.

Our proposed Prevention and Early Help arrangements have to tackle inequality in order to improve the long term prospects of families most in need.

In light of the reduced budget, the proposed model includes a combination of a small group of central services and four new Prevention and Early Help teams, based on the current Parliamentary constituencies.

The following services are proposed to continue to be delivered centrally:

- Early Help Gateway (incorporating Families Information Service);
- Oversight of education safeguarding
- specialist behaviour support and inclusion;
- short breaks;
- intensive family support;
- youth offending;
- service support, for example admin, finance and performance management

The proposed model will create new 0-19 Prevention and Early Help Teams which will target those wards/areas with the poorest outcome and bring together the delivery of:

- the children's centre core offer across the District;
- targeted key work with individual children and families (Families First);
- parenting support;
- early education and childcare quality and take up;
- education attendance;
- diversity and cohesion.

This will bring together a number of key partnerships, services and commissioning plans. Based on our Families' Needs Assessment, it is proposed the four teams cover:

- Keighley/ShIPLEY combined
- East
- West
- South

The proposed model will support the Council's previous intentions to procure Public Health children's services including Health Visiting, School Nursing and Oral Health and will be an opportunity to integrate services to the constituency footprint. This will also be based on consultation and needs as identified in the Service Reviews for Health Visiting and School Nursing in 2016.

The proposed model also aligns with the Council's Youth Services and ward partnerships and also with other key NHS services such as Child and Adolescent Mental Health Services (CAMHS), maternity services and Primary Care.

In order to achieve the required savings we expect this will lead to a reduction in the region of 220-240 (including all seven Children's Centre clusters) full time equivalents across the affected teams and services.

The proposal means that the children's centre core offer will be delivered through the 0-19 Prevention and Early Help Teams. It is also proposed that we align children's centre sites to the Parliamentary constituency boundaries and that the following buildings are reconfigured as Outreach bases (which are expected to deliver a minimum of 8 hours of activities per week with children and families):

- Hirst Wood;
- Highfield;
- Parkland;
- Farcliffe and Lilycroft;
- Princeville;
- Bierley;
- Tyersal;
- Wyke.

Section 2: What the impact of the proposal is likely to be

- 2.1 Will this proposal advance equality of opportunity for people who share a protected characteristic and/or foster good relations between people who share a protected characteristic and those that do not? If yes, please explain further.**

This proposal is intended to advance the equality of opportunity and a range of outcomes for babies, children, young people and families through universal services in all areas but with a higher level of targeting in those areas in which children experience the poorest outcomes or experience more adverse childhood experiences.

In the top ten wards, which will be targeted with enhanced support in the proposed model, there is a strong relationship between deprivation and the poorest outcomes for children and young people.

Proposed area teams will ensure delivery across the district as a whole and will ensure that services are accessible to the needs of our diverse communities. Through co-location and integrated with the 0-19 public health workforce we will make best use of available resources to identify and support vulnerable children and families at the earliest stage possible.

2.2 Will this proposal have a positive impact and help to eliminate discrimination and harassment against, or the victimisation of people who share a protected characteristic? If yes, please explain further.

Essential statutory services will be maintained by the LA, as well as those that deliver support to the vulnerable and disadvantaged e.g. through universal and target services.

A model based across areas footprint will help to eliminate discrimination and harassment by fostering a greater understanding of each other's needs, and through early identification, assessment and intervention using specialists and high quality practitioners improve outcomes for children, young people and families.

2.3 Will this proposal potentially have a negative or disproportionate impact on people who share a protected characteristic? If yes, please explain further.

The equality assessment carried out indicates that this proposal is likely to have no or a low impact, and so there is no disproportionate impact on any group who share protected characteristics. There is however a lot of change happening within the system as outlined above.

The changes are expected to lead to a reduction of the workforce in the region of 220-240 full-time equivalents. Final figures are subject to grading of posts and assimilations within the proposed new structure.

The affected workforce will include a higher proportion of women and detailed analysis will also identify any other protected characteristics within the workforce, for example, age.

As the changes are implemented the impacts will be reviewed and measured against the Outcomes Framework.

2.4 Please indicate the level of negative impact on each of the protected characteristics?

(Please indicate high (H), medium (M), low (L), no effect (N) for each)

Protected Characteristics:	Impact (H, M, L, N)
Age	L
Disability	L
Gender reassignment	N
Race	L
Religion/Belief	N
Pregnancy and maternity	M
Sexual Orientation	N
Sex	M
Marriage and civil partnership	N
Additional Consideration:	
Low income/low wage	L

2.5 How could the disproportionate negative impacts be mitigated or eliminated?

(Note: Legislation and best practice require mitigations to be considered, but need only be put in place if it is possible.)

We used the information collected from our engagement process to determine whether there would be an impact on any of the equality groups. On-going analytical and evaluation work will be undertaken to ensure services are meeting demand and outcomes are being achieved.

In order to improve outcomes for those with the poorest outcomes we will need to target resources. As such, we will not be able to offer the same level of support in all areas.

Having a Public Health 0-19 children’s service which provides a universal service to all families antenatal and at birth will ensure that any vulnerable and at risk families and children are identified early and signposted accordingly.

Families with low incomes in all areas will be identified and offered support. Ethnic minority children and young people tend to be concentrated in the priority wards.

Each of the proposed Prevention and Early Help Teams will be required to develop a Area Needs Assessment and Offer which will outline how the offer is responding to outcomes for children in their area. This will incorporate and publicise the children’s centre services to children under 5 and their families. We will continue to track and monitor the activities offered as already undertaken by children’s centres. This will allow us to monitor changes and make adjustments to the offer over time.

For children and young people, our proposed One Family, One Worker, One Plan approach should provide support without a succession of interventions from different agencies.

It may be possible that some children and parents in less deprived areas may find it harder to access services. We will address this by ensuring that there is a range of sites and activities across all areas and these will be increased in targeted areas. We

will also maintain strong relationships with childcare and schools in all areas so that vulnerable children and families in all areas can be provided with additional support when needed. There will still be a universal service offered to all women who are pregnant or had a baby which will be offered in the home. We will continue to provide an Early Help Gateway and Early Helps so requests for support can easily be made for a family in any part of the district.

We are proposing continuation of a range of sites, both designated and outreach in all areas. This should allow for flexibility and stepping up support as and when needs indicates.

Close alignment with Youth Services, Places Services and health services will also allow us to adjust services when needs become apparent.

This document is updated as we undertake more detailed analysis of impact on protected characteristics within the affected workforce.

As a result of consultation feedback, the following changes have been made to the preferred model:

- Executive have agreed an additional 500K per year for 2018/19 and 2019/20 to support transition into the new model.
- increase the proposed workforce from 197 FTE to 246.5 FTE (see Appendix 2);
- reductions in management and an increase in the number of posts working directly with families and communities, responses received from young people were very supportive of principles, in particular to the Key Worker approach;
- retain a dedicated service within Education Services focused on safeguarding and vulnerable pupils;
- we will retain the New Communities and Travellers Team (within Education Safeguarding);
- detailed plan on best use of buildings;
- stronger focus on developing Family Hubs and closer working with schools, primary care groups and local communities;
- implement proposals to redesignate seven of the proposed eight children's centre buildings to become outreach bases. Farcliffe and Lilycroft Children Centre will remain unchanged (Overview of children centre buildings can be found at Appendix 3).
- we will ensure as many of the core delivery teams (for example, Prevention and Key Workers) as possible will work on the same IT system (Early Help Module) by October 2018.

Section 3: Dependencies from other proposals

3.1 Please consider which other services would need to know about your proposal and the impacts you have identified. Identify below which services you have consulted, and any consequent additional equality impacts that have been identified.

The stakeholder consultation plan as set out in Appendix 12 of the report to Executive dated 7 November 2017 was fully implemented.

Responses included:

- 1189 consultation questionnaires completed;
- 201 members of the public attended one of the consultation events;
- Over 400 members of staff attended specific briefings;
- 174 emails providing detailed responses;
- An alternative model of delivery based on a Family Hub Model around schools;
- “Save Bradford Children’s Centres” petition with 2,508 signatures;
- 19 focus groups with young people involving a total of 115 young people.
- Response from the Traveller Community.

The full consultation report is published as part of this report.

A SEN Improvement Test has been updated

Section 4: What evidence you have used?

4.1 What evidence do you hold to back up this assessment?

A Families Needs Assessment has been completed.

This document included considerable analysis which provides a baseline of data covering a breadth of information from demographics, deprivation, maternity, health, education and social services and this analysis will underpin the development of the proposed model.

An overview of the affected workforce is in place. Detailed analysis of impact on the workforce is on-going and this assessment updated as appropriate.

Executive report and appendices discussed at the Council Executive on 11 July 2017 and on 7 November 2017 outline the analysis gathered.

The full consultation report is published as part of this report. The report has lead to changes as set out above.

4.2 Do you need further evidence?

An initial engagement on was run from 17 July 2017 to 20 August 2017 when a wide range of stakeholders were consulted. This analysis was reviewed and where necessary changes and amendments were made in light of feedback received. This analysis was fed into the Executive Report which will be discussed at the Council Executive on 7 November 2017. There was broad agreement to the proposed vision, outcomes and messages related to people’s views about using and accessing services. Formal consultation was then undertaken on a preferred proposed model.

The full consultation report is published as part of this report. The consultation lead to changes as set out above.

Section 5: Consultation Feedback

5.1 Results from any previous consultations prior to the proposal development.

5.1.1 Following the report to Executive in July 2017, the Council's Children's Services undertook a five week public engagement, from 17 July 2017 to 20 August 2017 on its proposal to remodel and redesign the Prevention and Early Help arrangements and services across an area footprint.

5.1.2 The Council and partners developed a plan to identify and reach key groups ensuring stakeholders were given the opportunity to share their views. This included:

- Parents and carers across the District;
- Children and young people;
- Partnership groups;
- Elected members;
- Private, voluntary and independent sector;
- Teams and services across the Council, VCS, NHS, Police etc;
- Education settings.

5.1.3 The Council promoted this engagement period through social media sites, as well as being published on Bradford Schools Online (BSO) and on the Council's Engagement and Consultation website. A large number of events took place during the summer across the District, parent forums, young people's sessions, play days in City Park, events at children centres, libraries, Police Summer Camps and member sessions.

5.1.4 The survey contained 16 questions overall, 10 of which were focussed around:

- our vision for Prevention and Early Help;
- identifying the right outcomes;
- services which are currently accessed;
- travelling to access services.

5.1.5 One further question was provided to allow people to make any other comments.

Summary of Findings

5.1.6 In total 615 people completed the survey (further analysis can be found in the Executive Report dated 7 November 2017):

- 256 people (41.6%) took part through focus groups and submitted a paper copy, 359 (58.4%) took part online;
- Those aged 11 – 15 years were the largest group to take part in the engagement (271 / 47%), followed by those aged 16 – 24 years (180 / 31%) and 35 – 44 years (40 / 7%). The remaining 15% were made up of other respondent types;
- 50% of respondents who took part in the engagement online and through a paper version were white British, followed by 12% who were Mirpuri Pakistani;
- The majority of respondents were male (51% online/paper version);
- 5% of respondents who took part reported a disability.

- 5.1.7 The majority of respondents identified ‘mental health – support for young people’ as the most important area in providing support to families and this was reflected in the comments people made.
- 5.1.8 We identified that some young people struggled to understand the questions within the survey. We will ensure before we commence formal consultation that we will produce a children and young people’s survey, to ensure the language and questions are clear. We will also ensure that there is extensive consultation with those supporting and caring for babies and younger children.
- 5.1.9 The feedback indicated that there is District support for the vision to move services to a locality model and to work in partnership with agencies to ensure the best possible outcomes for all children, young people and families.

5.2 The departmental feedback you provided on the previous consultation (as at 5.1).

The above feedback was incorporated within developments so far and also considered as part of the present proposals. An analysis was also provided in the report to Executive dated 7 November 2017.

5.3 Feedback from current consultation following the proposal development (e.g. following approval by Executive for budget consultation).

To ensure a transparent analysis of the feedback following consultation, the Council commissioned Peopletoo to undertake this piece of work. Peopletoo analysed all the views of residents, partners and affected teams through a variety of methods, including an online questionnaire, consultation events and both email and freepost facility.

Consultation commenced on 12 November 2017 and ended on 12 February 2018.

The full consultation report is published as part of this report. The report led to the changes to the proposed model as set out above.

Overall, responses received from young people were very supportive of the principles of the proposals, with particular reference to the Key Worker approach and the locality way of working. Where there were concerns, these were predominantly from professionals and partners around the resource capacity to deliver the model, and from parents who had concerns about losing Children’s Centre provision.

79% of respondents to the consultation questionnaire stated that they either “strongly disagree” or “disagree” with the key overarching proposal to create an integrated Prevention and Early Help Service for 0-19 year olds (up to 25 for SEND) and the level and nature of the concerns were consistent across events and other responses. However, a more detailed analysis highlights factors which include:

- An analysis of consultation evidence provided to Peopletoo showed a marked difference between respondents to the questionnaire and those that attended events, with the former being more negative about proposals than the latter, where there would have been more opportunity for clarification and questions
- Many respondents whose comments implied that they disagreed with the proposals, expressed comments that predominately disagreed with the principle

- of budget reductions, rather than the model itself which was the primary subject of the question, and this will have impacted on the figure;
- Finally, there was a significant change in this figure in the last week of the consultation, which coincided with a strong representation by those in support of Children's Centres in this final stage. Before this, 60% of overall respondents strongly agreed or agreed with the proposals.

Predominant reason for concerns about the proposed model itself are:

- That whilst there was support for some elements of the proposal, the fact it is accompanied with a proposed 47-51% reduction in staffing resource to deliver was felt to be unrealistic;
- Working across a wide age range was diluting skills and experience of staff and not providing families with the specialisms that they needed;
- The impact of the changes on the EY agenda, in particular the Children's Centre Core Offer

61% are in favour of an approach that prioritises those more in need of support.

More people disagree with the locality approach (44%) than agree (36%), whilst the key worker approach is equal between both agree and disagree at 41%. This therefore suggests that there is much more balanced view about the key elements of the proposed approach and that it is the three key concerns (above) about the overall change to a 0-19 service driving the 79% that disagree with the overall vision, notwithstanding the point above about some using this initial question to express dissatisfaction about budget reductions.

5.4 Your departmental response to the feedback on the current consultation (as at 5.3) – include any changes made to the proposal as a result of the feedback.

See 3.10 in the main report which sets out the main findings from consultations and actions/changes arising from these findings.

Appendix 6 - SEN Improvement Test

Objective	Evidence / Data
<p>Improved access to education and associated services including the curriculum, wider school activities, facilities and equipment, with reference to the LA's Accessibility Strategy</p>	<p>Area based activities which are close to children and families; we will continue to deliver the short breaks statement and activities to support disabled young people to access to local leisure. We will increase communication and joint working with the range of professionals that can form a 'team around the child'.</p> <p>Further consultation with interested parties and communities would be required to develop and implement a detailed plan to be in place to take account of community venues and seek the best delivery which will maximise accessibility and uptake by the public. This would ensure increased access for disabled children and childcare.</p>
<p>Improved access to specialist staff, both education and other professionals, including any external support and / or outreach services.</p>	<p>We intend to ensure that there is a strong link with the proposals to transform SEND teaching support services which will include dedicated and specialist support to universal services particularly childcare and early education; this enhances the offer at a local level.</p> <p>These proposals will, therefore, lead to improved access to education and associated services including the curriculum, and wider school activities, while providing improved facilities and equipment.</p>
<p>Improved access to suitable accommodation</p>	<p>An element of the proposed Prevention and Early Help model includes a commissioning pot which can be deployed to increase Children and Young People access where they need some additional support beyond reasonable adjustments.</p> <p>Children and Young People who need individualised packages of support should be signposted to individualised short breaks inclusion support and/or statutory single Education Health Care Plan Assessment processes.</p>
<p>Improved supply of suitable places</p>	<p>The proposed Prevention and Early Help model includes on-going capacity around childcare; access and quality, there will be links with workers and the proposed transformed SEND teaching support services to increase accessibility for Children and Young People with disabilities.</p> <p>This will mean services are closer to the communities which they serve, there will be a much clearer pathway for any referrals, there will be better communications and shared systems between services so they can join their offer up for children, young people and families and make them more efficient and seamless. We intended to co-design timetables of community support</p>

	aligned as close as possible to school clusters.
Confirmation from the host school that they are willing to receive pupils with communication and interaction needs	N/A
Confirmation of specific transport arrangements	<p>An area based model, particularly working closely with school clusters will increase accessibility of services for Children, Young People and Families.</p> <p>For those children and young people with higher needs a referral to assessment for a personal budget may be required. A range of targeted inclusive activities for disabled children is also commissioned.</p>
Confirmation of how the proposals will be funded and the planning staffing arrangements put in place	The proposed Prevention and Early Help model will be funded through Council base budget; this includes provision for short breaks, specialist behaviour and inclusion for disabled children and young people.

Appendix 7 - Consultation with Trade Unions in respect of Prevention & Early Help Proposals

Budget line detail

Prevention and Early Help – detailed proposals form part of the Executive report Doc AC -7th November 2017

Early Years - From 2017 part of the Dedicated Schools Grant will be removed. Plans are being formulated to develop a coherent and targeted suite of early years' services including early help, family centres and early years' including Children's Centres.

<u>Trade Union Feedback</u>	<u>Management Response</u>
<p><u>7.12.17 - Level 1</u> Unite - need to update figures on spreadsheet to avoid confusion</p>	<p><u>7.12.17 - Level 1</u> - Separate S188 declared for this proposal in Nov 17 - detail of this to be discussed at Level 2 in afternoon of 7.12.17.</p>
<p>Trade Unions asked for details on the structure and implications for staff; clarity on the budget (£3m on the attached) – what is the budget reduction (including the Public Health element). They also commented on the comms and consultation around the proposals; people are finding it difficult to log on – can we make this easier for people to access?</p>	<p>Need to cross reference with Health & Wellbeing due to link with budget lines.</p> <p>Management will update.</p> <p>Management have provided further detail on the structure and staff numbers at the Level 2 Meeting held on the 7 December and the Level 3 Meeting held on the 14 December. However, we agreed with Unions this would go to staff after Christmas; week commencing of 2 January 2018.</p> <p>Clarity on the budget is available in the report presented to Executive on the 7 November.</p> <p>Action has been taken to make sure the website is accessible and an easy read version of the booklet has been produced.</p>
<p><u>Joint Level 3 - 14/12/17</u> A query was raised in relation to the caseloads of workers at present and whether this will increase/decrease."</p>	<p>It was agreed that current caseload information will be shared with Union colleagues.</p>
<p>A query was raised in relation to assimilation rights for staff.</p>	<p>HR advised that this would be looked at nearer the time but it would be in line with managing workforce change but due to the vast number of varying posts; it would be done in conjunction with Union colleagues</p>
<p><u>Level 2 - 21/12/17</u></p>	

<p>NEU had requested the JD's in draft form; for the 0-25 Key Worker role specifically and asked if these were available.</p>	<p>Management asked for views from Union colleagues on the forthcoming meeting with staff and it was felt that Unions had not received enough detail and therefore they were not in a position to be able to answer queries from staff or support them sufficiently. It was agreed that the meeting would be postponed and re-arranged for the New Year.</p>
<p>Unison noted a general concern about whether the target would be met in terms of the savings. For example, the 50% reduction in referrals and whether that would happen and if not, would the Early Help referrals transfer to Children's Social Care, who are already struggling with workloads. This is also impacted by whether the Council is receiving the right funding.</p>	<p>Management confirmed these were being worked on and would be available shortly.</p>
<p><u>Joint Level 3 - 18.01.18</u> P 20 7 9 Unison sought response to request for caseload information. Unison asked if this information could be expanded to include Family and Children's Centres.</p>	<p>HR advised that it is currently due to on 12 February but due to the extent of the proposals; this may be reviewed depending on staff feedback. The consultation is about the proposed structure and not about individual posts. There needs to be a balance on moving forward on the proposals but maintaining good working relationships with staff.</p>
<p>Unison asked if a preliminary grade could be given.</p>	<p>HR advised a clear grade would need to be given following initial comments on profiles by the 12 February.</p>
<p>Unison had been asked by a member of the range of grades so staff can see what they may have rights to.</p>	<p>If comments received back on job profiles can set up a grading panel quickly including the 3 outstanding but dependent on comments they may need looking at again.</p>
<p>Unison queried the business case; where the teams in scope and number of occupied and proposed posts are listed – what are the proportion of staff to grades (raised in Level 2 on 11 January). Could</p>	<p>Management advised could put posts in there.</p>

we have post numbers by name.	
Chair asked if there had been many questions about the job profiles.	Management advised that there had been little that required any change to job profiles.
Unison requested that if the staff consultation was to be extended could a new date be set today.	Management advised the proposal would go to Executive in April and we are asking People Too to analyse feedback and do a report so that it is independent. We would have to look at timescales for going to Executive. Mark Anslow advised that this linked to the SEND consultation too and we would have to close the consultation with the public and staff on the model but that we can continue to consult with staff on proposed structures and job profiles. Chair noted there was some confusion with both consultations and staff not sure which consultation they were in scope for. Management agreed to provide an overview of information given to date to go to teams and TUs.
NASUWT noted in the last set of minutes the SEND consultation was due to finish on 12 February but 2 events have been arranged after that.	Management advised that following Executive the two consultations were brought into alignment. Public consultation on P & EH will end on 12 February. SEND will run until 28 February. Both SEND & P & EH will be reported back to Executive on the 3 April 2018.
Unison asked in terms of the public consultation, how many sessions had been attended. There seem to be 2/3 different processes mixed up; the Prevention and Early Help model, LAC numbers going up, CP numbers going up and referrals increasing. Management are trying to save £13m but there is a £200m shortfall in social care and we don't have enough information.	<p>Management took on board the comments. Simultaneous processes have caused confusion and recognised the need to make it clear there were 2 consultations. Staff in scope for both consultations had been provided but it was noted Management needed to clarify matters for staff misinformed.</p> <p>It was agreed to send individual e-mails may cause more concern so agreed to send a briefing using the two slides from the staff briefing presentation which clearly state which teams are in scope along with a note sharing when the consultation close, when structures would be shared and if anyone is unsure of their position to speak to their line manager.</p> <p>Management agreed to provide an overview of information given to date to go to teams and TUs.</p>
Unison felt that a lot of time and money had been given to advertise the Early Help proposals but for SEND there didn't appear to be the same input.	HR noted SEND did have staff briefings before Christmas which were well attended and it was clear about which staff were in scope. Structures were not available for today. SEND proposed structure and job profiles will be presented by 1 February for comment by the end of February.
Unison asked when the structure would be shared.	<p>Management advised this would be shared at the Level 3 meeting on the 1 February.</p> <p>Management will present the following draft structures and profiles by the 1 February for comments by the end of February:</p> <ul style="list-style-type: none"> • Learning Environments including traded service teams and targets • Service support across EES • SEND
Unison asked when the SEND consultation would close.	Management confirmed 28 February.

<p>Unison noted some education staff want to know if they have a future role, e.g. Education Safeguarding reduction in staff. Which posts will be going?</p>	<p>Management felt staff should be able to recognise their post. HR noted TU's were taking about people but Management are talking about structures and functions. If staff have a document to say the Family Information Service they would know there were in scope.</p> <p>Management agreed to provide an overview of information given to date to go to teams and TUs.</p>
<p>NAHT asked if the title on the job profiles would make it clear.</p>	<p>Management advised there are some singular job profiles which may not be clear and some staff think their service is indispensable so will not affect them, e.g. Employment/Licensing roles are a statutory responsibility and staff may not think this is scope but it is.</p>
<p>Unison advised they could not access the shared drive and it was easier to e-mail.</p>	<p>Management noted that all TU's should have been given passwords to access SharePoint. Will follow this up to ensure all can access.</p>
<p>NASUWT raised the issue of Faith Tutors and what will happen to them as they are on teachers terms and conditions.</p> <p>NEU also added Teaching and Learning Consultants as they are not a traded service but it is expected they will be and they are worried.</p>	<p>Management advised that posts for accessing education such as those mentioned are proposed to go to the traded learning environment.</p> <p>Management will present the following draft structures and profiles by the 1 February for comments by the end of February: Learning Environments including traded service teams and targets</p>
<p>Unison asked if that meant that they will still be employed by the Council on teachers terms and conditions.</p>	<p>Management will present the following draft structures and profiles by the 1 February for comments by the end of February: Learning Environments including traded service teams and targets.</p>
<p>NEU noted the Teaching and Learning Consultants were expected to be 100% traded from a position on 0% traded. How much income is needed.</p>	<p>Management advised an officer had worked with teams and structures to be tabled on 1 February will have the detail.</p>
<p>NEU asked if the trading amount was not met who would bridge the gap – the Council or would we lose staff.</p>	<p>Management advised that teams were not spinning out into separate organisations; they will still be Council staff.</p>
<p>NASUWT asked how many Teaching and Learning Consultants were on the structure.</p> <p>NEU thought there were 2 part time and NASUWT noted there were 7 Faith Tutors.</p>	<p>Management to confirm.</p>
<p>Unison asked how the public</p>	<p>Management advised these had picked up with really good turnouts at some sessions; 35 at Carlisle Business Centre</p>

consultations had gone.	and 23 at Shipley Library. The survey had 560 responses to date.
Unison asked if these had been done in different languages and how we were communicating with communities with different languages.	Management advised translators had been at some sessions and if we are aware of a need for this, translators will be made available. BSL, audio and easy read have been published on-line.
Unison asked if the survey had been done in other languages.	Management advised it hadn't but hard copies were available and staff could complete with the public on a 1:1 basis if needed. The Youth Service were also doing this with young people.
Unison asked about the independent report. Unison asked if they were local.	Management confirmed this would be done by People Too and will look at how staff work, what they feel works, how we could improve services, etc. Management advised they were and that they had undertaken the BDP Review into Early Help.
Unison noted the consultation focussed on Early Help and Prevention but in terms of future work what was the direction with, e.g. mental health, dental health.	Management advised there would be 1 plan for 1 person and would include early years but also talk about access to other services, e.g. domestic violence. There would be a good range in conversations.
Unison asked where the Community Play and Development Team would sit and there role.	Management advised this would be in the Learning Environment but would go into the traded service section. Judith Kirk will be sending a communication to all traded services teams.
Unison asked about the Prevention Co-ordinators – at Level 3 which is the same level as the Prevention Worker – should it be higher.	Management will look at this but not always as it depends on their experience and this will need to be considered as part of the grading process.
Unison noted that the post sits alongside these at Level 3 but says a professional qualification is needed. Some staff will not have a qualification but will have been doing the role for 20 years.	HR noted that during the assimilation process Management would look at qualifications but also experience and if staff have been doing the job for a considerable period this will be considered. Staff will not be disadvantaged. The usual assimilation principles will apply.
Unison asked for the rationale for the Access and Take Up Workers (8 posts).	Management advised this had been received as a FAQ and information would be provided.
Unison noted that Management were going to the Early Help model and there will be a cost to run some of the programmes with, for example, the VCS.	Management advised a multi-agency group has been mapping all programmes across the 7 clusters and evidence and the next step will be to look at what has been delivered well. Management noted there are a large array of programmes and we will look at what works. We don't think we will put new programmes in place but would have a pool of staff trained to go and staff assimilated would be able to deliver.

<p>Have these costs been taken into consideration. Has this been thought through and what programmes will be in place.</p> <p>Unison noted that every pound spent can save money in referrals but is that cost effective and will you deliver this. What are the training needs.</p>	
<p>Unison asked about thresholds and how Management would decide which families to target. There has to be a corporate responsibility for what will happen.</p>	<p>Management advised if there were less programmes then less families would be targeted. This isn't something we want to do but we believe it is the least worst option. This takes out the money but we will mitigate the impact.</p>
<p>Unison noted that Bradford has a young population and are referrals going up because of the young population growth.</p>	<p>Management noted this was because of growth but also because of the increase in poverty. We have to do this because of the money we have and we believe this is the best way to do this. There are question about the impact on the front door but we understand this and it is really difficult.</p>
<p>Unison queried the 3 Nursery Schools which staff were TUPE'd in August 2015 and this will finish in August 2018. What will happen to those staff; are they in scope.</p>	<p>HR advised that these staff were not TUPE'd to the three clusters, they are still Council employees – the management of the staff was devolved to the Governing Body of those schools. In August 2018 they will come back into scope as the funding comes from the Children's Centre budget and staff have been included in the figures.</p> <p>Chair noted that staff spoke at Overview and Scrutiny and were confused about their status so this needs to be clarified and included in the briefing to staff in scope.</p> <p>Management agreed to provide an overview of information given to date to go to teams and TUs.</p>
<p>Unison asked if they could engage with these staff or would it have to wait until August 2018.</p> <p>Unison asked if they could have names of staff in scope.</p>	<p>Management advised this could be done now but through the leadership of the school.</p> <p>Staff briefings have been done for nursery school clusters. What we need to be clear about is that posts are funded through the Children's Centres budget.</p> <p>Management will provide when we have identified who we are paying for from the affected budget.</p>
<p>Unison asked if the consultation can be extended to end of February.</p>	<p>Management advised the 3 job profiles would be sent on Monday and the public Prevention and Early Help consultation would close on the 12 February but we can continue discussions regarding proposed structures and draft profiles. The remaining structures will be brought to the meeting on 1 February.</p> <p>Management will present the remaining draft structures and profiles by the 1 February for comments by the end of</p>

	<p>February:</p> <ul style="list-style-type: none"> • Learning Environments including traded service teams and targets • Service support across EES • SEND
<p>Unison asked for more detail on what we will and will not be providing.</p>	<p>Management to respond.</p>
<p><u>Level 2 - 11/01/18</u></p> <p>NEU asked for a copy of the outstanding JD for the Sufficiency Officer following the presentation last week.</p>	<p>Management to follow up. UPDATE - draft profile released on 23.01.18</p>
<p>UNISON asked if current workload information has been shared.</p> <p>UNISON expanded that if staff want to consider where they would want to work they would need to know what is there in the first place and consider issues such as case loads, etc.</p>	<p>Management advised this hadn't and would feed into the consultation. Any actions from Joint Level 3 will also be picked up too.</p>
<p>NEU requested that staff have their contracts checked to make sure their start date or continuous service and pensions information is correct. It is also important to ensure that current JD's reflect accurately the staff are doing during the consultation period. We are asking managers to check with their staff. Unison agreed that some staff are picking up extra work and have been doing this a long time and it is not in their JD. Noted that a lot of JD's are out of date and it is unfair to staff if they are doing a job to help the service. NASUWT agreed the pension contributions need to be checked whilst in the employment of the Council as it is</p>	

more difficult to do this after they have left the Council.	
Unison requested clarity on what will no longer be happening in the proposed model so they can consult with members.	Management to log with Mark Anslow to ensure Managers confident this is in order. Managers would be unable to check every current JD but if staff feel there is a genuine issue then they need to take this up with their manager to look into. UPDATE - managers were asked before Christmas to ensure ESS/MSS information was updated. Mark Anslow to reinforce.
Unison asked for clarity on when the rest of the structure will be circulated on Central Services and for more information on the proposed learning environment.	Management to respond.
NASUWT asked about Faith Tutors who are on Teachers Terms and Conditions and are a traded service. How will the proposals affect them; it has not been explained what this will mean.	Management to check when this will be released and update. UPDATE - agreed at Joint L3 that these would be available by the 1 February. Central Services Manager draft profile was released on 23.01.18
UNISON had a query on the 'Key Elements from Proposed Area Based Model – Structure Report to OJC Level 3'. On page 3 and 4 it lists the posts in present teams in scope and gives the number of occupied and proposed posts, e.g. Practitioners - 72 FTE (band 4 – SO1) to 28 FTE. Asked for a breakdown of how many Band 4, SO1, etc. are being kept..	Management to respond. UPDATE - this will be confirmed as part of draft structures for Learning Environments to be shared by 1 February 2018.
UNISON concerned around Education Safeguarding element; what will not be done and what has to be done as a statutory duty.	Management to respond. UPDATE - this was provided to TU's and uploaded to SharePoint on 23.01.18
UNISON had Admin staff asking lots of questions about what it means from them but there is no detail.	Management noted concern and will respond. UPDATE - it is proposed that oversight for both educational safeguarding and attendance will be incorporated within the early help gateway. This will include oversight of children missing education, home education and fixed penalty. the overview of data etc. will then inform targeting of work by the area teams.
UNISON had a general observation; having looked at the work of North Yorkshire, some of the areas identified the priority of families. What will the priorities be in families that we will target,	Management to respond. UPDATE - given scale of savings we need a collective review of service support. This has been clarified in consultation update across P&EH and SEND. A draft Service Support structure and job profiles will be provided by the 1 February 2018.

<p>e.g. issues like poverty, numbers of disadvantaged children, number of children in trouble with the Police, number of NEET's, number of children with mental health issues. North Yorkshire do have figures and it would be good to have those for Bradford.</p>	
<p>UNISON noted in the Child Death Overview Panel report that 69 children had died in Bradford and had gone to Panel. These figures will include cot death, smoking cessation, etc. but this figure could go higher.</p>	<p>Management noted the comments and will respond. UPDATE - the Executive report refers to the Families Needs Assessment - detailed data is provided and analysed in this document - 10 wards for highlights for larger groups with poorer outcomes. The report also outlines the elements of services to be delivered by the proposed teams. they will continue to prioritise workless families, school attendance and those affected by DV, substance misuse and parental mental health. The re-commissioned public health service and new proposed team would focus together on delivery of the High Impact Areas as outlined in the report. we will continue to deliver the mandated HV checks.</p>
<p>UNISON noted conversations were happening with Barnardos and Action for Children but asked if these staff would be taken back into the Council and if so, would that affect the 54% figure of potential job cuts.</p>	<p>Management noted the comments.</p>
<p>Level 2 - 25/01/18 Re 4C2 – NEU raised the issue of Faith Tutors and Teaching and Learning Consultants and the proposal they move to a traded service and they don't know what this means for them.</p>	<p>Management's understanding was that the figures had been factored into calculations but will check. UPDATE - yes, both were included in the FTE/headcount of affected teams.</p>
<p>NASUWT according to figures there at 6 FTE Faith Tutors and 1.5 FTE Teaching and Learning Consultations – are they being grouped together.</p>	<p>Management advised that the funding streams had been looked at. Diversity and Cohesion as a function is not fully traded but is moving in that direction.</p>
<p>NEU asked what would happen if the funding target was not met.</p>	<p>Management to look at this and advise.</p>
<p>NEU asked how far down the road will it be for that to happen. Do Management have a figure for how much schools will pay.</p>	<p>As they move to a traded service there will be income generation targets (full cost recovery). If the service is on a trajectory to meet the target then that is positive and we will support the service to meet the target. If they don't start to make progress to achieving the target the matter will be brought back here for a discussion along with HR.</p>
<p>NASUWT noted the Faith Tutors and Teaching and Learning Consultants were</p>	<p>Costs will include the cost of running the service. Management will review progress and if service are not far enough along the journey or there is no interest in the service it will be discussed further.</p>

<p>on teachers terms and conditions and previous discussions held agreed to keep them on these conditions but staff feel that it is being raised again and they don't know what is happening.</p>	
<p>Unison advised staff were not aware of the proposed changes and thought this was new in the restructure and that it had not been brought here. Surprised by the shortfall and potential job losses.</p>	<p>Management were not aware of any proposals to change their terms and conditions.</p> <p>It is worth noting that if staff move to a traded service it will be a different way of working and we will look at providing training and support for marketing/sales, etc. Staff will not be expected to go into this model without the necessary support.</p>
<p>NASUWT asked if any work had been done with schools to see if they were prepared to buy in as they also have to do more with their money.</p>	<p>Management felt that wasn't the case but will look at next week in Level 3. Will be looking at skills moving forward. We do not envisage job losses as it is not part of the process.</p>
<p>ATL felt schools would buy in for Faith Tutors but why would schools buy into EHE and travel.</p>	<p>Management advised there have been conversations with schools re the SEND work. Would need to check re other services but would have thought this had happened to make sure that they can cover the costs. Management believed the service was marketable.</p>
<p>Unison asked for information on what are statutory functions and what is not so can identify what functions are being removed. Are services for travellers statutory.</p>	<p>Management advised that some of these services offer best practice and a centre of excellence for travellers. EHE and education safeguarding are a part of that core function. There is guidance on EHE but there is no statutory function but the bottom line is that we have to safeguard children.</p>
<p>Unison noted their concerns that some families may slip through the net and there needs to be corporate responsibility.</p>	<p>Management advised that there are no statutory rights for the LA regarding EHE and the only reason the Council can intervene is if there is a safeguarding issue. It would be irresponsible if we did not have this on the agenda though; if there is a peak in EHE we need to follow up and we wouldn't say we would do because it's not statutory.</p> <p>Statutory services are Admissions and making sure every child has a school place. When it comes to other strands like the Traveller Service and Diversity and Cohesion they are not statutory but it is good practice so are included in the mix. The Play Service is traded and not statutory but again is valued. It is a fine balance between what we need to do and also good practice.</p>
<p>Unison noted that an alternative proposal had been received; have the unions had sight of this.</p>	<p>Management met with the VCS yesterday and they have looked at the cumulative budget cut including the Youth Service. The savings to be made are £13.3m but the actual figures is greater given other proposals in the system. The depths we are going to are more than we would choose to do but getting the right frontline workers in is the challenge we have. One partner has submitted an alternative proposal as part of the consultation and we will be considering that.</p>
<p>NASUWT advised that although it had</p>	<p>Management advised this had only just been received and when the consultation closes on the 12 February it will be</p>

<p>been agreed no permanent appointments would be made during this period it had been noted that a permanent Visual Impairment Teacher had been appointed permanent and remainder of team were on temporary contracts.</p> <p>Unison also noted that 5 permanent appointments had been made in the Gateway (3 started in post and 2 starting in February).</p>	<p>looked at then. This will come through in the feedback and will be shared with you to aid decision making going forward.</p> <p>A session is taking place tomorrow to look at where we are up to, including what is emerging and can update at Level 3 next week.</p>
<p><u>Joint Level 3 - 01/02/18</u></p> <p>Unison asked if the Lead Achievement Officer was the Headteacher.</p>	<p>Management confirmed that this post will hold the functions of the required Headteacher for the Virtual School. The proposal is to remove the post for Deputy Head and have 3 teachers</p>
<p>Unison asked how many staff currently in the LAC Virtual School?</p>	<p>3.2 FTE (exactly the same as previously). There is an interim arrangement with the Deputy Head until October 1st. The view is that the Head of Virtual Service should be managing that with the interface with front-line staff. No change in numbers.</p>
<p>Trading Services, as well as directly supporting the teams under the proposed Commercial Services Manager, the wider teams with trading targets would also be supported, for example, Education Psychology. UNISON asked if this had been factored in.</p>	<p>Management responded that they would look at the target and have that trajectory. If we think there is no revenue coming in and there is no sustainability for a specific service then will bring it back to the TU's.</p>
<p>UNISON asked if any of these were statutory services?</p>	<p>Governor Advice and Support– statutory duty towards Governance. We need to make sure we have Governor advice and guidance and could be potentially bought</p>
<p>UNISON asked if there would be any job losses within the structure?</p>	<p>. Management said that with the Achievement Officers, the numbers are like for like and likewise for the Admissions Officer. There is a change in designation with the Virtual School. 2.5 in the Governor Advice, Guidance & Support.</p>
<p>UNISON asked regarding the School Achievement Officers – have we only got 4 people to deal with this?</p>	<p>When management looked at the proportion there was a fine balance. If we find that we need to increase by keeping a commissioning post, we can commission a Headteacher to do some commissioning work. Safeguarding the jobs we have, but keeping robust</p>
<p>UNISON asked how we will work with Academies?</p>	<p>Part of it will be the Learning Environment Manager and Deputy Director (EES) post. We have some robust conversations about Academies taken at Deputy Director (EES) level.</p>
<p>UNISON asked if we were in a position to become fully traded?</p>	<p>Management said that as it stands at the moment would say yes. Many LA's don't have play teams. We need to look at them. The proposed Lead Officer for Commercial Services will support teams and in the interim an officer has</p>

	been released to provide support for 2-days per week.
UNITE asked about number of job losses across service support functions?	Management confirmed that we had still not got the full details from Barnardos and Action for Children. Executive report outlined, 106.3 ftes at £2.9M (but not yet with Barnardos & Action for Children figures) <ul style="list-style-type: none"> • YOT admin (6.4fte) - propose remain 'as is' • 13.2 fte at £590K 'as is' funded by Curriculum & Employment Skills – not service support • Proposed is 67ftes at £1.86M
UNISON asked about the meeting with staff next week and would we know who these staff were?	Management said they had sent out a summary which re-stated which teams were in scope and shared staff names. Management had asked that staff who were unsure if they were in scope should speak to their Managers.
UNISON asked if it was possible that members of staff could sit in two structures? It was unclear.	Management agreed to have a conversation in relation to this outside of this meeting.
UNITE asked if VR would be offered to staff?	Management said that there were no VR's within this structure, but can't be sure which staff we want in the future – post April 5th then we can look at VR's. HR said that there were lots of calculations to be done, but will ensure that this is managed in a certain way and impact on services.
UNISON – Early Years Team managing Early Years funding – are they soft elsewhere?	Management replied that we have incorporated Finance within the job profile for Business Support Officers. There will be a Business Support Officer post and then a Business Support Manager post. We need to look at creating apprenticeships opportunities if vacancies arrive and following all assimilations.
<p>Level 2 - 08/02/18</p> <p>Unison raised concerns about the consultations being mixed up and asked if some communication could be circulated to separate it out. Felt the restructure needed to be slowed down as staff are struggling to understand.</p> <p>Staff don't understand where they are.</p> <p>NEU also had concerns from staff about not understanding how they were affected so had not been asking questions, e.g. traded services, children's centres.</p>	Management advised SEN and Behaviour are part of the assessment and achievement services. Early Help is about meeting needs early on. These are the two strands and across the top of this are the enabling and business functions. It is proposed the Faith Tutors move to a traded service and sit in that arm and staff are aware of this. Some work has been done around working to a traded service model.
Unison noted staff were at the briefing today who thought they were in scope and they were not. Meetings are also	Management advised that meetings are put in with as much notice as possible but also when trying to respond to specific issues swiftly.

<p>arranged at short notice.</p>	
<p>NEU raised concerns from the Manager of the New Communities and Travellers Team. There are 1.5 Teaching and Learning Consultations listed when there are 2.5 and the Manager and another member of staff are not on the list. When the end of the consultation is reach we need to be sure that the groups/staff are correct for assimilation – if this went ahead today it wouldn't be right.</p>	<p>Management advised that when the list was produced the Manager wasn't in post so wouldn't be on the list; this would also be the case for the Diversity and Cohesion Manager. It was a snapshot at that time and will need to be worked on as we move forward.</p>
<p>Unison noted the same position for Governor Services – list 2.5 staff and there is a Manager and 4 staff.</p> <p>Unison noted the response but felt time was running out.</p> <p>Unison noted the same position for Governor Services – list 2.5 staff and there is a Manager and 4 staff.</p> <p>Unison noted the response but felt time was running out.</p>	<p>Management noted that in terms of co-ordination of the FTE lists we have to make sure it is right and it is Managers' responsibilities to make sure it is.</p>
<p>NEU asked for information on who was entitled to which post as no information available.</p>	
<p>Unison noted Social Care staff were going to managers to see if they were in scope – if don't have any planned job profiles how will they know.</p> <p>Concerned with the drip feed of information and surprises such as the Faith Tutors which TU's weren't aware of. How do Management know which families</p>	<p>Management felt there were two clear issues. Irrespective of cuts, there are serious decisions to be made about risk. The other side is making the most of the financial envelope available.</p>

<p>to target and what the thresholds will be? Research in Sheffield and Huddersfield has shown a link between budgets and support to families. Need a separation between SEN and EH.</p> <p>Where did the £13.3m figure come from?</p>	
<p>Unison advised if Management go to the EH model, yes this will lead to savings but need evidence of the programmes to be in place and that information isn't there.</p> <p>The crux is what will you deliver and what won't be. Understand what Management are doing but what will you deliver with 50% less staff.</p>	<p>Management noted if you have 10 staff for 2 strands; 1 manager and 4 staff each – can't join those teams to give more. There will be a targeted service and preventative work but not for as many people.</p>
<p>Unison noted that staff cannot do the same job if they can't deliver. Cases won't be less but there will be less staff – how will this work. What won't you be doing?</p> <p>NASUWT agreed that if you are consulting we need to know what staff will be doing in the future.</p> <p>Unison noted the comments would be captured but wanted an answer to the question.</p>	<p>Management advised that we cannot provide what we have done previously and noted the comments.</p>
<p>Unison asked in terms of the SEN proposals that members are raising concerns on workloads and the number of staff presented is incorrect.</p>	
<p>NEU noted that if members don't get information then we can say that we won't close the consultation. The business</p>	<p>Management said that if there are a cut in numbers we will work through the finite number of cases staff take on. If the Portage Team can work with 30 families, other families will not receive the support they did and that will be the harsh reality.</p>

case is simple and we don't have the detail. For example the Portage Team are proposed to reduce from 6 to 3 with a workload of 143 cases – how will that be managed.

NASUWT asked which families we would no longer support and who would you help. How can you decide when it may not be a need now?

NEU noted that those 143 cases may need a visit and you may offer less but will those families be signposted elsewhere.

Unison said this will be based on the premise that there is somewhere to signpost families to. It goes back to the earlier request of what will be needed in each area and who will take responsibility when it goes wrong. The structure is not wrong but the consultations are being mixed up.

NEU said that at the point the consultation closes you might say you can't cut the Portage workers. It's having that final sum.

Unison asked why the cut is £13.3m – why can't half of this be taken from the £24m reserves. Unison asked why the cut is £13.3m – why can't half of this be taken from the £24m reserves.

Unison noted the public consultation would close on 12 February and asked if there was opportunity to extend the consultation. Why does the structure

Management advised these challenges need to go through to Council. That cut was what Children's were given and we have had to work with that. We are also concerned re the numbers, however, with the new model staff will work to the family footprint so there is mitigation but there will be a reduction. If we can cut management posts we will but we have to fit in the envelope given and there is no approval for any more funding.

Management advised that savings have to be in place by 2020/21. If looking at protected salaries and the fulls savings of the structure wouldn't come in until September 2020. If there is a delay and the position remains as it is, there is the potential that cuts may have to go deeper to meet target savings.

have to be in place by October?	
Unison asked why the two consultations were together.	Management advised that if it had gone to plan the SEN arrangements would have been implemented by now but following representation from the Deaf Society the proposals were reconsidered so has brought these two together.
Unison felt that the SEN proposals could go through but the EH proposals would take longer as would also need to work with HR on how assimilation would work.	
Unison asked if the EH proposals could move to January so that SEN could be dealt with first.	Management advised the SEN proposals are set against the HNB and not core funding but would still have the issue of not making savings.
Unison asked if it could be put back 2 months.	Management advised it wouldn't be until September given the summer term. It would wipe out any teachers terms and conditions and any form of consultation would be put back by around 6 months and if still working to the £13.3m savings would have deeper cuts from not meeting the window.
NEU asked for information from Mark Anslow line by line on the pool staff will be put into and what posts will be available. If there is a costed model this information should be available.	Management agreed to pick up with Mark Anslow and Julie Cowell and ask Mark to attend Level 2 next week.
Unison want clearer information and ideas of who we will be targeting so that can ask questions. Some of the information is vague saying 1- workers but how many people will they deal with, what programmes will run. If there are 1,400 cases – how many children is that.	
NASUWT asked what would happen to traded services if they didn't meet the target.	This would be reviewed. A support structure is in place to support them to meet the target. We have good practice in the Music Service and they have been working with teams. We have to move to a marketable service and indications are that it is a good service to sell but if there is no client base this will be reviewed but we believe they can operate effectively.

<p>NEU noted that schools are not necessarily the clients but families are and need to look at the misnomer that families will pay and get into the detail.</p> <p>Unison noted the law of unintended consequences that a service can be cut if not trading and the knock on effects make this in danger of making into pounds, shilling and pence and families don't operate in that way.</p>	<p>Management do not want to do this and would want to expand service and all agree with that but the budget is what the budget is.</p>
<p>Unison felt if we got the model right but doing over the future as a 5-10 year programme and slow down the process.</p> <p>It was felt that the model needed more time to see if it would work and it felt rushed.</p>	
<p><u>Level 2 - 15/02/18</u></p> <p>Unison raised the question of the 1,400 families – how many children are there in those families as that will impact on workloads.</p>	<p>Management advised that this could be provided; will need to ask the children's centre cluster for some of the information so will provide as soon as possible.</p>
<p>Unison also asked what programmes will be presented and what training will be available for those programmes. No information on what the cost efficiency is, what areas will be targeted, e.g. obesity, early education, poverty.</p>	<p>This is a work in progress. Looked at the work across the children's centres, VCS, Better Start, etc. to see what programmes there are. There is a long list which needs to be matched to the evidence and then will make recommendations. This should be available in the next month.</p>
<p>NEU agreed the need to see the current and proposed programmes and how many hours a programme, like Henry, would take. If we know the hours we could see how many FTE posts would be</p>	<p>Management advised the actual content may be some time away. There is a long list of current delivery. There is also the question whether it is good to have so many programmes.</p>

<p>needed.</p> <p>Unison agreed that if there are 10,000 hours but staff can only deliver 8,000 there will be a problem and staff need to know what this will look like for them.</p> <p>NEU noted it would be helpful to know what is likely to be cut. Children's centres concerned programmes will be cut and we can't offer any advice on what is happening.</p>	
<p>If there is one worker for one family concern is that if reducing the service some families will fall through the net and concerned re impact of that. The proposal is trying to encourage communities to take up the shortfall but programmes need to be put in place first and then roll out the work. This is rolling out the programme before we know what will be in place.</p>	<p>The Chair said it would be disingenuous to say that we would provide the same service. There are risks and with better ways of working the consequence will be a targeted resource and it is hard to quantify that given the budget reductions.</p>
<p>Unison had evidence of work in North Yorkshire and York around thresholds.</p>	<p>The Chair advised that this information was available in Bradford and we know what we want to do for our children. Going forward the challenge will be delivering that ambition. The Chair has spoken to a number of people, including the Children's Commissioner, about how we get investment into Bradford.</p>
<p>Unison said the problem was understanding. The idea of the Hubs and their depth is good but would like to see the structure in place and then this time next year make the cuts and work on that.</p>	<p>The Chair advised this was part of the challenge. We are proposing to move to a new way of working. There have been 1,200 responses to the consultation. Last year we did get some investment put in and Bradford does have a low spend on Children's when compared regionally.</p>
<p>NEU noted it would be different if there was a proposal on the table and a plan behind it but there isn't. Colleagues don't know what it will deliver.</p>	<p>Management advised they were looking at the detail of evidence and usage. Also looking at total resource and talking to schools and the VCS to try and co-develop programmes.</p>
<p>Unison asked that the detail is looked at first and then the work is taken forward. Need something going out in the next briefing to say that this is what is</p>	<p>The Chair agreed and need to say that we have been challenged to deliver this and if there are 1,400 families what that will mean for them.</p> <p>Management to action this.</p>

<p>happening now; we are looking at this and will be consulting about what we will be providing.</p>	
<p>Unison advised the biggest worry was that less staff will be in the structure but they think they will do the same things and they won't but what will they be doing. Feel that we should see where the model is going and feel it will work but need to take time and not rush into this.</p> <p>Unison advised of a letter from the Region to the Leader regarding this.</p>	<p>Management noted.</p>
<p><u>Joint Level 3 – 15.2.18</u></p> <p>Unison requested information on Sharepoint was checked as some JP's do not match with the structures (SEND Places Planning, Attendance Lead, and Practice Lead) and some missing JP's (e.g. Early Education Funding Team).</p>	<p>Management to action.</p>
<p>Unison asked whether some of the admin functions within the central services structures would be looked at and whether these would be looked at team by team and to be localised into localities.</p>	<p>Management confirmed that a lot of feedback has been received and these will be taken into consideration.</p>
<p>Unions asked whether there would be a delay to the consultation in order for feedback to be taken into account and for any new proposals from Management to be presented and for these to be considered.</p>	<p>Management advised that the consultation would still close on 28 February but they would look at any alternative proposals put forward by staff/Managers. An update will also go out to staff to provide them with the most up to date position which will also include the timeline, any recent FAQ's and next steps.</p> <p>MA advised that a lot of questions had been received and that there were particular areas to be looked at including a proposal put forward by Children's Centres.</p>
<p>Unions asked that when models are being looked at and staffing implemented; to</p>	<p>Management to note/action.</p>

ensure that any H&S factors are taken into account to make the service safe and viable.	It was noted that staff are being offered additional training/CPD to increase their skill sets.
Unison asked whether there would be any targets against the work related to Traded Services	MA advised that this was outlined in the presentation given to staff at recent briefings.
Unions raised that some information being presented is misleading for staff i.e. post reductions and that the information is not up to date. Unions mentioned that it is difficult to support members if the staff no's/names are missing.	HR advised that they have provided an up to date staffing list to the Programme Team. JK apologised for any errors and for any mis-communication. A request has also been made to all Managers to ensure that ESS/MSS is fully up to date.
Unison asked what functions would be undertaken by the SEND, Place Planning, Post 16, Project role.	The role will mainly focus on the specialist and sufficiency of places.
Unison raised a concern regarding a post currently within SEN which is not showing on any of the structures.	JH to raise with JK directly in 1:1 meeting next week
<u>Joint Level 3 – 23.2.18</u>	Meetings have now been held with Legal Services. The FAQ for the Public consultation has now closed and is also closed on the website. PeopleToo are working on the questionnaires which 1,200 questionnaires were received and over 100 face to face sessions. The draft PeopleToo report will be available next week. The staff consultation has been extended to 07 March 2018. The consultation will close for comment on 07 March and draft proposals will be tabled at the TU meeting on 15 March. A report will also outline any changes and also indicate statutory roles.
It was agreed that YOT admin would not be part of the EH consultation.	MA to notify YOT staff.
Management tabled a document on comments/responses on structures and job profiles which will be used in place of the FAQ.	Management and Unions went through the document and discussed around the table. An updated copy will also be sent out with the minute

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Report of the Strategic Director (Children's Services) to the meeting of Executive to be held on 3 April 2018.

Subject:

BJ

Final proposals for the restructure of SEND Specialist Teaching Support Services for children and young people with SEND.

Summary statement:

This paper follows the Executive meeting held on 9 January 2018. At that meeting Executive agreed:

- a. that Option 3 was the preferred model for formal consultation;
- b. a period of consultation from 17 January 2018 to 28 February 2018 with children, young people, families, partners, stakeholders, staff and all interested parties;
- c. to receive a further report in April 2018 following formal consultation.

A proposed model to transform SEND Specialist Teaching Support Services was first presented to the Executive in June 2017. As a result of feedback and responses during consultation particularly from schools, parents, internal staff teams and national organisations the proposals were revisited and changed.

As a result of the growing population of children and young people in Bradford including those children and young people with SEND and the increased complexity of special needs, there is an increased demand for SEND specialist services and places for children and young people with SEND.

Following the announcement from Central Government in September 2017 regarding the introduction of a National Funding Formula (NFF) from April 2018, Bradford will only gain £7.5m and not £15m which was indicated in previous national consultation on the NFF. The impact of this is significant with the High Needs Block (HNB) spending forecasted to exceed what is available by approximately £2m per year for the next four years.

On the 9 January 2018, three options including a preferred model for a restructured SEND Specialist Teaching Support Service was presented to Executive for consideration. Executive agreed to a further period of public consultation on the revised preferred model.

Peopletoo were commissioned to provide an independent analysis of the consultation feedback. This report summarises the results from that consultation and sets out for approval a refined model for Specialist Teaching Support Services resulting from the representations made during consultation.

Executive is asked to approve the final model for transforming the SEND Specialist Teaching Support Services taking into account the analysis of consultation representations, an updated Equality Impact Assessment (EIA) and SEN Improvement Test.

Michael Jameson
Strategic Director

Portfolio:

Education, Employment and Skills

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Overview & Scrutiny Area:

Children's Services

SUMMARY

- 1.1 Following the Executive meeting held on 9 January 2018, Members agreed to receive a further report in April 2018 following a period of formal consultation commencing on 17 January 2018 until 28 February 2018.
- 1.2 This report focuses on proposals relating to:
- The outcome of the public consultation;
 - The proposal to transform the SEND Specialist Teaching Support Services.
- 1.3 The Council values, appreciates and has listened to feedback from consultation.

REVISED PROPOSAL AND STEPS TO 2020

- 1.4 As a result of consultation feedback, the following changes have been made to the proposed model:
- Portage* Home Visitors have been increased from four to six full-time equivalent (FTE);
 - The new service will have a single point of referral to simplify the process for families and schools and external agencies and reduce the number of staff / professionals that families with children with SEND and schools have to interact with;
 - The 0-25 service will be able to better support transitions for children and young people, for example from home or early years settings into schools, both primary, secondary and special and then into Post 16 education, provision and apprenticeships and into employment;
 - The service will continue to be centrally managed and as a result there is a reduction in management of the previously proposed four locality leads, replacing them with two Lead Specialist Teachers who will line manage between them the Specialist Teachers and carry a reduced Specialist Teacher caseload;
 - The inclusion of a Lead Specialist Officer who will line manage the non-teaching roles in the service;
 - Equality and Access (Inclusion) Officers reduced from four to two;
 - Post 16 Personal Advisers (14-25 Transition Officers) reduced from four to one;
 - A service support reduction of 2.0 FTE in total from the High and Low Incidence Teams. N.B. The administrative support will come from the SEND service allocation from the council's base budget (see structure at appendix 1);
 - There are an additional 4-5 FTE at risk and there being potential redundancies;
 - The pressure on the DSG (High Needs Block) remains and there is a need to generate £1m of income. To provide clarity - the staffing model of the 0-25 years SEND Inclusive Education Service proposed in the Executive report on 9 January 2018, was modelled on 70% being funded by the HNB and 30% of this being income generation; this will need to come from the non-statutory teams in the new structure.

- The HNB will continue to fund the statutory work, i.e. the assessment, statutory preparation of an Education, Health and Care Plan (EHCP), and the maintenance of a Bradford EHCP. The following Specialist Teaching and Support Services are involved in this:
 - Specialist teachers for example of Autism, Cognition and Learning, Early Years, Social, Emotional and Mental Health, Hearing, Visual, Multi-Sensory Impairment, Physical and Medical Needs;
 - Specialist officers, practitioners and instructors for Hearing, Visual impairment and Multi-Sensory impairment;
 - Portage;
 - The early identification of young children, some of whom are not in school but in Private, Voluntary and the Independent early education sector, through the Education Advice 1 (EA1) pathway.

- The teams that provide these statutory services will not be required to generate an income, unless there is capacity within these teams to do so, and this will be from activity such as training which can support schools, their staff and partners to meet the needs of children and young people with SEND.

N.B. * Portage is a pre-school home visiting educational and support service for young children with SEND and their families.

- 1.5 The Local Authority continues to have the statutory duty to maintain any Bradford Education Health and Care Plan, and is aware that it must secure any special educational provision in accordance with an EHC Plan.

- 1.6 There are some changes proposed in the overall FTE staffing reductions; and to the proposed structure in light of consultation feedback from stakeholders and the need to give greater clarity about the need to generate income, whilst ensuring the statutory duties and work of the specialist teaching and support services are preserved.

- 1.7 The following teams, who provide statutory functions and work alongside the above services, for example in the assessment, evidence gathering, preparation of EHCPs, are outside of the scope of this consultation and are unaffected. These include:
 - The Education Psychology Service;
 - The SEN Assessment Team;
 - 14-19 (Post 16) Learning Difficulties and Disabilities Team.

- 1.8 In September 2017, the Government announced the new National Funding Formula (NFF) to be introduced from April 2018. This provides funding for all school pupils including children and young people with SEND. The intention of the NFF was to ensure that every school will have funding matched to need, to give every child an excellent education. Bradford should have gained £15m but under the new national proposals Bradford will only gain £7.5m. The impact of this is significant with the HNB forecasted to exceed what is available by approximately £2m per year for the next four years.
- 1.9 Under National Funding Formula, as is currently set out by Government, school and academy budgets in Bradford face significant pressure. This pressure has been driven primarily by staffing costs (employer National Insurance and pension contributions in particular) rising whilst values per pupil of formula funding, high needs funding, and other grants have remained broadly static. This is a pressure that is expected to continue to increase across 2018-2021 as salary costs continue to rise. This is a national issue. These circumstances may make it more difficult for schools to buy services in the future even though, under National Funding Formula, a greater proportion of Bradford's Dedicated Schools Grant funding is allocated to schools to support SEND and additional educational needs.
- 1.10 The reports to Executive dated 20 June 2017 and 9 January 2018 set out the context to the proposed changes:
- Bradford is one of the youngest populations in the country alongside a growing population of children and young people with SEND;
 - Evidence and findings of the SEND Strategic Review in Bradford 2016;
 - Our continued vision to support children, young people and families as early as possible, build independence and so also reduce costly intervention later in the life of a child or young person;
 - The complexity of special needs in Bradford is also increasing and, as a result, there is a need for more specialist places;
 - An increasing number of referrals for Education, Health and Care assessments (EHCA);
 - Bradford did not get as much funding as we had expected according to the National Funding Formula;
 - Opportunity to transform the SEND teaching and support services and provision;
 - Meet the needs of the SEN Improvement Test (see Appendix 2).

2. BACKGROUND

2.1 On 9 January 2018, Executive agreed to a further period of consultation on a revised preferred model. Key elements of the revised preferred model included:

- A restructure of the current SEND specialist teaching support services into one 0-25 Inclusive Education Service for children and young people from 0-25 years as outlined in the SEND Code of Practice (potential reduction of 25 – 30 FTE across affected teams);
- Creation of two teams (structure can be found on appendix 1) within the service who will work closely together to deliver support through a single referral system:
 - a team to support high occurring needs such as autism, learning needs and social, emotional and mental health needs;
 - a team to support low occurring needs such as hearing impairment, visual impairment, multi-sensory impairment and physical and medical needs.
- both these teams would have an element of HNB funding but would also need to generate some income through the trading/selling of some of their services to schools;
- the proposed model would be 70% funded from the high needs block and 30% income generation and would be more sustainable; it also includes support for young people 16 – 25 years of age which was feedback by young people, parents and organisations during the previous consultation in summer 2017;
- aligning to the four localities proposed in the Prevention and Early Help model agreed for consultation by the Council's Executive on 7 November 2017.

2.2 MESSAGES FROM CONSULTATION

2.2.1 Between 17 January 2018 until 28 February 2018, Children's Services undertook a further period of public consultation on the revised proposals to remodel SEND services 0-25. This built upon engagement undertaken between 2 May 2017 and 6 June 2017 and an initial period of public consultation between 26 June 2017 and 31 August 2017.

2.2.2 This included consultation across a wide range of interested parties through a number of mechanisms:

- consultation events (day and evening sessions);
- young people sessions;
- a consultation questionnaire;
- a letter to parents / carers / families with an EHCP;
- email facility for parents and partners to contribute their views.

- 2.2.3 The consultation was promoted through the Local Offer website, Bradford Schools Online (BSO), the Council's consultation and engagement website, social media (Facebook / Twitter), Parents Forum website.
- 2.2.4 Peopletoo were commissioned to undertake and report on an independent analysis of consultation. The full report of the findings of the consultation can be found at Appendix 3.
- 2.2.5 Responses included:
- 178 people completed the consultation questionnaire, of which 56% were parents, 11 % were children with complex health / disabilities, 3% were young people in education. The strongest representation beyond these groups was schools, which in total accounted for 51% of responses;
 - 168 emails were received in total. A number of which from organisations were submitted with detailed responses attached as reports that suggested a number of meetings that had taken place within organisations to provide a response to the consultation;
 - Of the 168 emails, 96 were from parents;
 - Three formal representations were submitted from:
 - National Deaf Children's Society;
 - Airedale and Wharfedale Autism Resource (AWARE);
 - Royal National Institute of Blind People
 - Just under 200 people attended the engagement sessions, which included over 80 young people and over 100 parents;
 - An online petition was submitted, entitled "Save Bradford's Teaching Support Teams" signed by 2053 people as of 01 March 2018. The petition has been considered as part of the public consultation in relation to these proposals, as it could not be established whether the petition contained the details of the required District residents, the petition will be presented to Council on 20 March 2018 but not debated.
- 2.2.6 Overall 52% of respondents who completed the online questionnaire agree or strongly agree with the proposals to create an integrated 0-25 high incidence / high occurring SEN teaching support service. Representations received suggested that services would be more accessible by streamlining systems and processes. In particular that the proposals would reduce the amount of referral documentation that would need to be completed. Respondents were also supportive in the principle of a more co-ordinated approach. A number of respondents asked for more clarity in relation to the income generation plans, and around the delivery of statutory services.

The table below sets out the main findings from consultations and actions/changes arising from findings:

The creation of an integrated 0-25 years high incidence / high occurring SEND Teaching Support Service to support children and young people who have autism, additional learning needs and difficulties such as social, emotional and mental health needs	
Consultation Findings	Action proposed to respond to consultation
<ul style="list-style-type: none"> • The reduction of specialist service resource, respondents felt that there was not enough resource allocated to the SEND service and provision by the Local Authority already; • Current waiting times for EHCP assessments, respondents were concerned this proposal would mean that a reduced specialist service will mean waiting times will become longer for children needing assessments; the reduction of specialist teaching posts may lead to a more diluted service; • Concerns about the reduction of Portage services (in particular from parents) and alignment to locality teams as part of the Prevention and Early Help proposals could leave Portage Workers isolated; • The service delivery structure needed to be more proportional between high and low incidence; • The requirement to generate an income of 30% of the costs of the new service, may lead to an inequity of provision; • Whether the services could generate income of 30% as of the cost of the service as pupils with EHCP provision must be free. 	<ul style="list-style-type: none"> • Specialist teaching support services are involved in the assessment and statutory preparation of a child's Education Health and Care Plan, according to their individual need, and there will be no change to this duty. The Educational Psychology Service, also important to the assessment and evidence gathering, is unaffected and outside the scope of this consultation. The SEN assessment team is also outside the scope of this consultation as is the current 14-19 SEND vulnerable children's team who support young people with EHCPs. • We have proposed an increase to the number of full-time Portage Home Visitors by two from four to six FTE. • There are more staff in the High Incidence Team compared to the Low Incidence team. • We are working on a trading model based on the non-statutory teams within the new service for September 2018 and will be gathering the views of schools/other providers at Post 16 to look at possible options and ways in which the non-statutory teams could generate income providing services for schools and other providers and expand on current arrangements for trading; schools plan, make provision, deploy staff and their resources to meet the needs of their children and young people with SEND - this has not changed and it will be for schools to decide how they wish to use their SEND funding to meet their pupils needs. We have provided further clarity about the amount that is required from developing trading arrangements with schools and which teams will be developing a traded offer. Teaching support services will continue to work closely with schools to ensure that their statutory duties are delivered. There is no expectation that these teams will need to generate an income unless, after the delivery of

	<p>their statutory work there is additional capacity to do so. . The Local Authority continues to have the statutory duty to maintain any Bradford Education Health and Care Plan, and is aware that it must secure any special educational provision in accordance with an EHCP.</p>
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<p>The creation of an Integrated 0-25 years low incidence / low occurring SEND Teaching Support Service to support children and young people with hearing impairment, visual impairment, multi-sensory impairment and physical and medical needs.</p>	
<p>Consultation Findings</p>	<p>Action proposed to respond to consultation</p>
<ul style="list-style-type: none"> • Concerns around a reduction of service resource and the need for the service delivery structure to be more proportional between high and low incidence; • How realistic was it to achieve 30% of funding through trading services to schools, • Concerns that a mainstream school may refuse a child if it meant having to pay for additional support, this would cause disruption to a child’s learning; • Would this not increase the number of children who are home educated • Supporting a child whose needs were across two of the proposed areas. • Concerns that a reduction in staffing resource may result in a longer wait for assessment. 	<ul style="list-style-type: none"> • There is no planned reduction to the specialists (teachers, officers, practitioners and instructors) in the Low Incidence Team who deliver highly specialised support to children and young people with Hearing, Visual and Multi-Sensory impairment and including physical and medical needs. More staff are proposed in the High Incidence team; there are larger numbers of children with needs in the high incidence area, the teams working in these areas provide advice, support, training and capacity building to school staff, and do less individual work with pupils, therefore they are able to work with larger numbers of children. The staff in the low incidence teams work in a different way; as there are fewer children, with often very high levels of need, specialist staff provide more individual teaching and support in their specialist area. • The vast majority (over 90%) of the work of this team is statutory work and this will continue; if there is capacity the team will continue to generate an income as it does now through, for example, training. • The majority of children and young people with SEN or disabilities have their needs met within local mainstream schools or colleges. • Schools receive delegated resources to meet the needs of children and young people with additional needs; in addition they



receive 'top up' funding to implement the provision specified in an Education, Health and Care Plan. These resources are not affected by these proposals.

- If a child's parents or a young person makes a request for a particular nursery, school or post 16 institution to be named in the Education, Health and Care Plan the local authority must comply with that preference unless:
 - It would be unsuitable for the age, ability aptitude or SEN of the child or young person, or
 - The attendance of the child or young person there would be incompatible with the efficient education of others, or the efficient use of resources.
 - There is no evidence that the proposals would increase the number of children and young people who are home educated, parents opt to home educate for a wide variety of reasons.
 - There will be one new service so where there are children with a range of needs the service will be able to co-ordinate their joint support more efficiently.
 - There is no change to the specialist staffing in the Low Incidence team; the only change is in the administrative support which will come from the SEND service allocation from the council base budget.

Creation of a model which comprises of two teams who will work closely and will have a single point of referral to simplify the process for families, schools and external agencies.	
Consultation Findings	Action proposed to respond to consultation
One point of contact is preferred when directing to a specialist service for a specialist need	<ul style="list-style-type: none"> The service will provide one point of contact/referral pathway
Alignment to the proposed Prevention and Early Help model. This would mean that services will be district wide and some based within localities (East, West, South, Keighley and Shipley combined)	
Consultation Findings	Action proposed to respond to consultation
<ul style="list-style-type: none"> Quality of time spent with families Some localities having a higher level of need which could lead to disparity of workload amongst teams. 	<ul style="list-style-type: none"> The service will be centrally deployed and their work will be aligned to the proposed area locality working in the Prevention and Early Help proposals

3. FINAL PROPOSED MODEL FOR IMPLEMENTATION

3.1 The Local Authority recommends to Executive that the revised proposed model be approved and sets out below key changes proposed as a result of consultation:

- One 0-25 years SEND Inclusive Education Service made up of two teams;
- A single point of referral to cut out duplication and improve transition;
- A high incidence / occurring team of staff specialising in the following, and aligning their work to the proposed area locality working in the Prevention and Early Help proposals:
 - Specialist teachers of Autism; Cognition and Learning;
 - Social, Emotional and Mental Health; Early Years;
 - Portage Home Visitors;
 - Equality and Access (Inclusion) officers.

3.2 The services below will work closely with the Commercial Services Manager within Education and Learning to deliver a traded service / generate income:

- Peripatetic Specialist Practitioners;
 - Early Years Specialists;
 - Post 16 Personal Adviser.
- A low incidence / occurring team of staff specialising in:
 - Hearing impairment, visually impairment and multi-sensory impairment
 - Physical and medical needs.

3.3 TIMELINE

3.3.1 To implement the proposed model, an indicative timeline is below:

Date	Activity
03 April 2018	Report presented to Executive
May 2018	Commence proposed re-structure/assimilations
July 2018	Assimilations completed
September 2018	0-25 SEND Inclusive Education Service 'go live'

4. OTHER CONSIDERATIONS

- 4.1 This proposed model sits alongside those proposals for Prevention and Early Help; the Public consultation ran from 15 November 2017 to 12 February 2018 and the proposals regarding the sufficiency of specialist places for children and young people with SEND. The initial consultation ran from 16 November until 14 December 2017 and the statutory representation period which ran from 25 January to 22 February 2018.

5 FINANCIAL & RESOURCE APPRAISAL

- 5.1 The SEND Teaching Support Service is currently funded via the High Needs Block of the Dedicated Schools Grant (DSG). Currently £4.863m of DSG funding is allocated directly to the Teaching Support Services; £4.513m from the High Needs Block and £0.350m from the Schools Block.
- 5.2 The High Needs Block also funds enhanced provision SEND places for very young children (early years) currently at a value of £0.404m. Therefore, the DSG's total spend on Teaching Support Services and Early Years enhanced provision places is £5.267m, with £4.917m * allocated from the High Needs Block.
- 5.3 The proposed model will reduce the High Needs Block funding of these activities in total by £0.775m.
- 5.4 In addition, the Schools Forum has now decided (in its recommendations made on 10 January 2018) to cease de-delegation of monies from the Schools Block for the primary ESD Service. The £0.350m previously allocated into the Service, from September 2018, will be released back to maintained primary schools.
- 5.5 The forecasted annual cost of the proposed new model for the Teaching Support Service is £3.96m, meaning that:
- It is forecasted that £0.90m of saving will be made through the proposed restructuring of the Teaching Support Services and the removal of up to 30-35 FTE posts.
 - With DSG funding of £2.966m, this Service will need to generate in the region of £1m annually in order to fully cover its costs. If this level of income cannot be generated then there is a risk that there will have to be further redundancies. This will be kept under close review.

** Please note that this is £0.192m higher than the £4.725m figure in the original report due to the inclusion now of the DSG's statutory ESD budget of £0.192m – following the focus of the last week about statutory activities.*

6. RISK MANAGEMENT AND GOVERNANCE ISSUES

- 6.1 The previous Executive report outlined the feedback from an online survey to schools which was undertaken in the 2017 summer term about the work of the specialist teaching support services. Of the 134 responses 99% had received support from the services and would like this to continue. Of the 117 schools who responded to this question – ‘Did the support have a positive outcome for the school/child?’ 96% (112) responded ‘Yes’.
- 6.2 We will build on the existing income generation work within SEND Specialist Teaching Services and the wider education service. The 0-25 years SEND Inclusive Education Services offer will be clear in regard to statutory elements free at the point of use and additional services that can be paid for. Statutory work will continue to be funded through the High Needs Block; the LA continues to have the duty to maintain Bradford Education, Health and Care plans.
- 6.3 Both the High and Low Incidence teams will continue to deliver their statutory work; the income generation will be from the non-statutory element of the service; there is no expectation that the teams who currently deliver statutory work will need to generate an income unless, after the delivery of their statutory work there is additional capacity to do so. (please also refer to paragraph 1.4). Income generation work can include:
- Workforce Development and Training;
 - Curriculum development to meet the needs of specific groups of pupils with SEND;
 - Support for effective practice for meeting the needs of SEND pupil’s e.g preparing for an Ofsted inspection.

It is important to note that the services who will need to generate an income, for example, through trading with schools, will be operating within a market place where schools can choose to trade or not.

- 6.4 Work is underway, subject to the final Executive decision in April, on engaging with schools, enablers, SEND managers and other key stakeholders on shaping, planning, co-producing and marketing a ‘traded’ offer which will be available in the summer term for schools to plan for the 18/19 academic year.
- 6.5 Unless there is a radical change in the way that SEND Teaching and Support Services are delivered and make a significant contribution to savings required from the High Needs Block the pressure on the HNB will continue. Spending is currently forecasted to exceed our allocation by approximately £2m a year for the next four years. The trajectory is that by 2021/22 the HNB will have a forecasted deficit of £9.2m.

7 LEGAL APPRAISAL

- 7.1 The SEND Code of Practice 2015 sets out statutory guidance that local authorities, education settings and health bodies must take into account when carrying out their respective duties in respect of children and young people aged 0-25 years.
- 7.2 The Local Authority has a duty to identify, assess and make provision to meet the special educational and wider needs of children within its area and to monitor progress against outcomes.
- 7.3 Local authorities are expected to take into account the views of children, young people and their parents when proposing changes to any SEN provision and should identify the specific educational benefits and improvements in provision which will flow from the proposals.
- 7.4 One of the initial factors for consideration of any changes to SEN provision for a local authority is to ensure that pupils will have access to appropriately trained staff and access to specialist support and advice.
- 7.5 The SEND Code of Practice January 2015 provides that when considering any reorganisation of special educational needs provision that the Local Authority must make it clear how they are satisfied that the proposed alternative arrangements are likely to lead to improvements in the standard, quality and/or range of educational provision for SEN (see Appendix 2 for the SEN Improvement Test).
- 7.6 The Local Authority must also have regard to its public sector equality duties under section 149 of the Equality Act 2010 when exercising its functions and making any decisions. The Local Authority must carry out an Equalities Impact Assessment to enable intelligent consideration of the proposals. The Local Authority must have due regard to the information in the Equalities Impact Assessment in making the decision to commence consultation on these proposals (see Appendix 4 for Equalities Impact Assessment).
- 7.7 Consultation with employees in relation to any proposed changes will follow procedures set out in 'Managing Workforce Change'.
- 7.8 The Local Authority should consult interested parties in developing their proposals and before publication or determination of those proposals as part of their duty to act rationally and to take account of all relevant considerations, any responses received to consultation should be considered and the Local Authority must have regard to its Public Sector Equality Duty before any decision is taken to implement the proposals.

7.9 Consultation must take place with all interested parties when proposals are still at a formative stage, sufficient reasons must be put forward for the proposal to allow for intelligent consideration and response. Adequate time must also be given for consideration and to respond to the consultation and conscientious account must be taken of responses when a decision is made. Whilst all options do not have to be consulted upon they must be sufficiently clear to enable consultees to understand the proposals.

7.10 Consultation must be easily understandable by those most likely to be affected by the proposed changes. The language should not be technical and what is being proposed and the impact of the proposals must be in plain English.

8. OTHER IMPLICATIONS

8.1 EQUALITY & DIVERSITY

8.1.1 S149 of the Equality Act 2010 (the Public Sector Equality Duty) provides as follows :

- (1) A public authority must, in the exercise of its functions have due regard to the need to;
 - a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010
 - b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
 - c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it

- (3) Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to;
 - a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
 - b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
 - c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

- (4) The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.

- (5) Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to;
 - a) tackle prejudice, and
 - b) promote understanding.

- (6) Compliance with the duties in this section may involve treating some persons more favourably than others; but that is not to be taken as permitting conduct that would otherwise be prohibited by or under this Act.

8.1.2 An updated Equalities Impact Assessment for the proposed model is attached as Appendix 4.

8.2 **SUSTAINABILITY IMPLICATIONS**

There are no direct sustainability implications arising from this report. Any development or changes to buildings undertaken as a result of these proposals will be undertaken in a sustainable way which minimises the future impact of the Local Authority's carbon footprint.

8.3 **GREENHOUSE GAS EMISSIONS IMPACTS**

The proposals would not impact on gas emissions.

8.4 **COMMUNITY SAFETY IMPLICATIONS**

There are no direct community safety implications arising from this report.

8.5 **HUMAN RIGHTS ACT**

There are no direct Human Rights implications arising from this report.

8.6 **TRADE UNION**

8.6.1 This proposal was presented at Children's OJC Level 2 on 7 December 2017.

8.6.2 On 28 November 2016 and 27 November 2017 the Council sent the trade unions a letter under S188 Trade Union and Labour Relations (Consolidation) Act 1992 to begin consultation on the proposed redundancies, about ways of avoiding the dismissals, reducing the numbers of employees to be dismissed and mitigation the consequences of the dismissals, with a view to reaching agreement". The feedback from the trade union consultation meetings is attached in appendix 5.

8.7 WARD IMPLICATIONS

Ward Councillors were able to attend all sessions throughout consultation. Specific meetings took place at Area Committees and Overview and Scrutiny.

9. NOT FOR PUBLICATION DOCUMENTS

None

10. OPTIONS

10.1 This report seeks approval to implement the proposed model.

10.2 If the proposed model is not approved for implementation then, in order to achieve significant savings from the HNB, deliver an expansion of specialist places across the district and meet the requirements of the SEN Improvement Test, alternative savings options would need to be identified and delivered in a timely way.

11. RECOMMENDATIONS

- a. That the Executive having considered the consultation responses (Appendix 3) and the Equalities Impact Assessment (Appendix 4) and SEN Improvement Test (Appendix 2) approves the proposed model to restructure SEND Specialist Teaching Support Services into one 0-25 Inclusive Education Service to include two teams supporting high occurring special needs and low occurring special needs children and young people, and agrees to the implementation of this model as per the timeline set out in this report.

11. APPENDICES

Appendix 1: 0-25 Inclusive Education Service Staffing Structure

Appendix 2: SEN Improvement Test for proposed model for implementation

Appendix 3: Consultation analysis from Peopletoo

Appendix 4: Updated Equality Impact Assessment

Appendix 5: Trade Union Notes (under Managing Workforce Change)

12. BACKGROUND DOCUMENTS

The proposed options are based upon the principles and outcomes encompassed in the following key plans and statutory guidance:

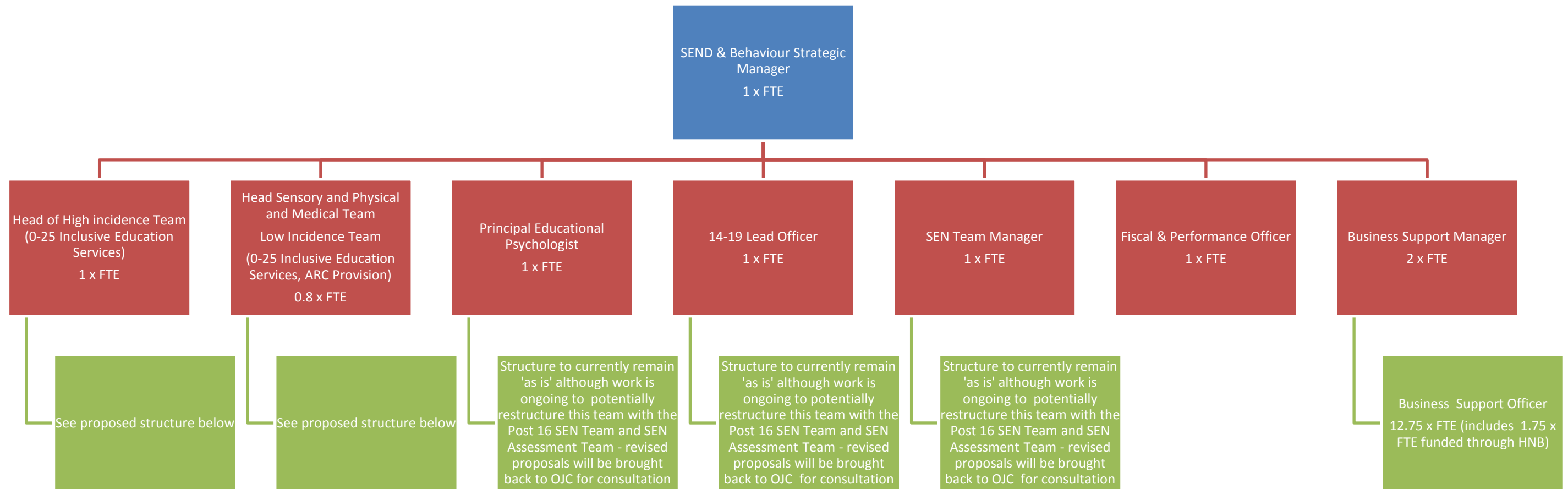
- SEND Code of Practice
- Bradford Council Plan 2016 - 2020 – A Great Start and Good Schools for all our Children
- Bradford Children, Young People and Families Plan 2016-2020

- The Education Covenant 2017-2020
- Directors of Children's Services: Roles and Responsibilities (2013)
- SEND Strategic Review in Bradford 2016

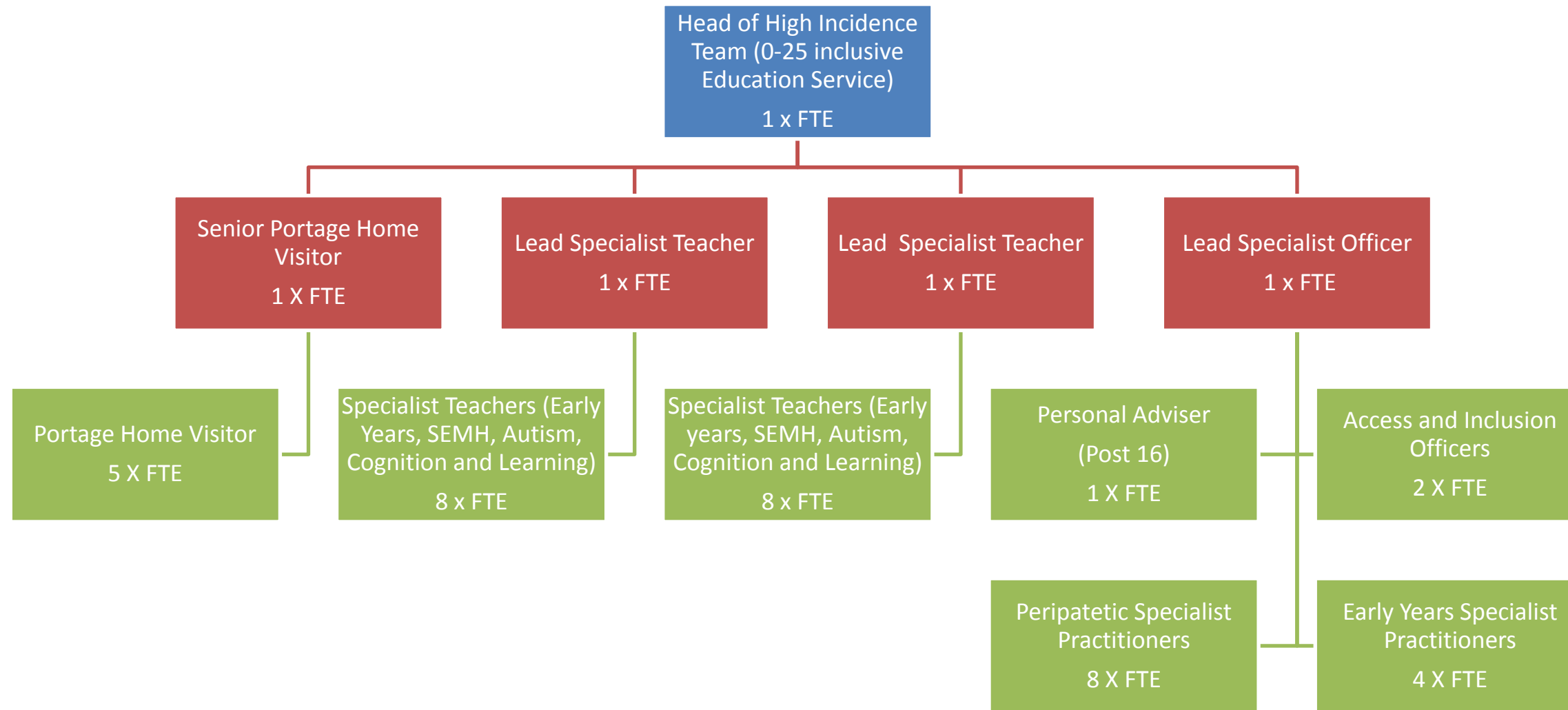
APPENDIX 1

Proposed SEND and Behaviour Management Structure

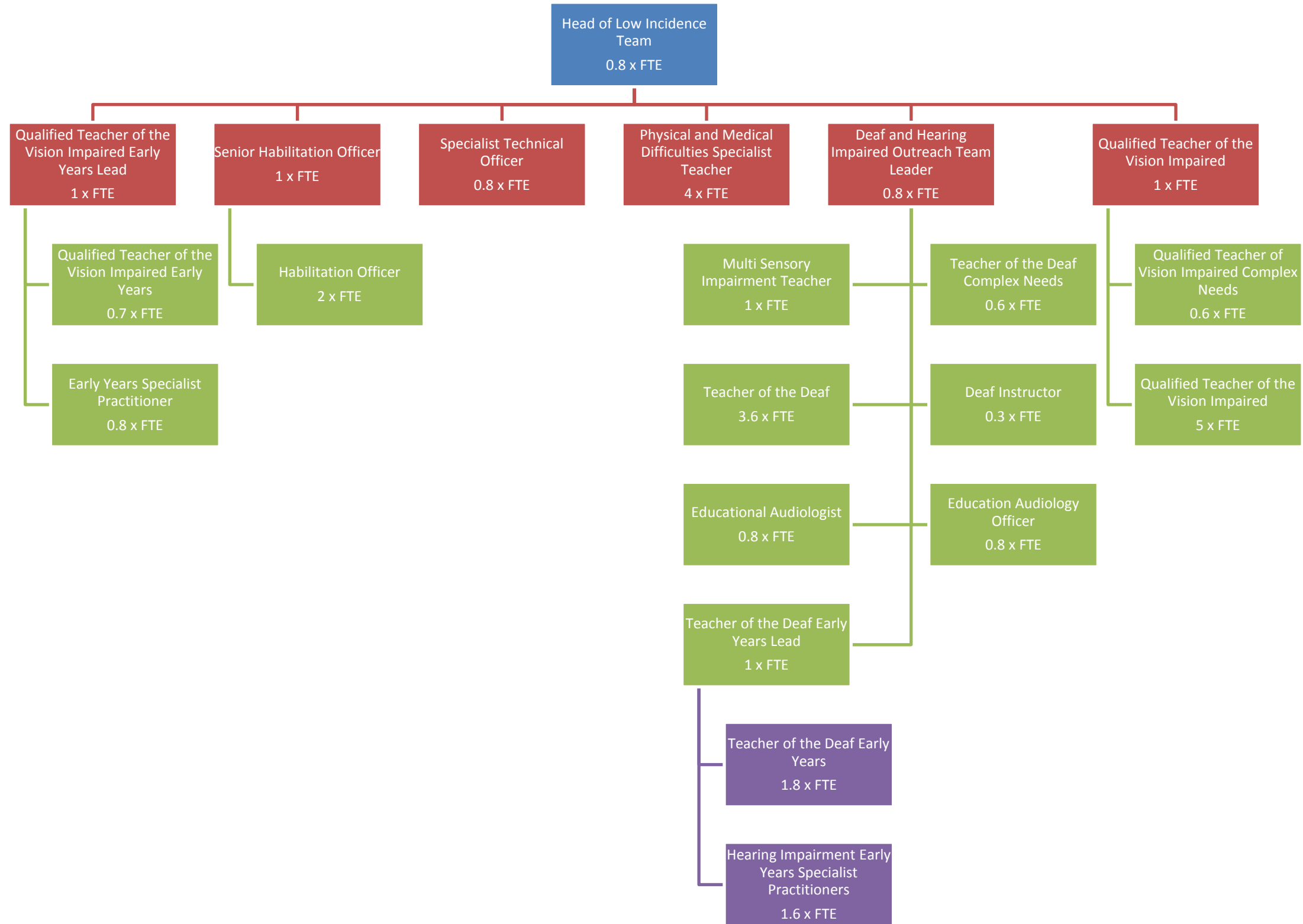
Page 118



0-25 SEND Transformation: Inclusive Education Service – High Incidence Team



Low Incidence Team (Sensory and Physical / Medical Teams): Proposed Outreach Team Structure



Appendix 2

The SEN Improvement Test for proposed model for implementation

Changes to the way in which specialist teaching support services are delivered for children and young people with special educational needs and disabilities (SEND)

This document demonstrates how the preferred proposal will improve the way in which the Local Authority delivers support to SEND children and young people through the teaching support services to meet the requirements of the SEN Improvement Test.

The SEN Improvement Test

Any local authority proposing to make changes to schools providing places for children and young people with any kind of Special Educational Needs or Disabilities (SEND), including Social Emotional and Mental Health Needs (SEMH), is required by the Department for Education (DfE) to show that the proposed changes to provision meet the SEN Improvement Test and are able to demonstrate that the proposed arrangements are likely to lead to improvement in the standard, quality and/or range of educational provision for children with special educational needs and disabilities.

The proposed model is likely to improve the service as follows:

1. Improved access to education and associated services including the curriculum, wider school activities, facilities and equipment with reference to the Local Authority's Accessibility Strategy.

SEND and Behaviour Services will continue to meet the requirements of the Government's inclusion agenda. It will ensure a flexible continuum of provision for pupils with a range of special educational needs and disabilities, according to the needs of individual children.

The teams that provide statutory services will not be required to generate an income, unless there is capacity within these teams to do so, and this will be from activity such as training which can support schools, their staff and partners to meet the needs of children and young people with SEND.

EHCPs are a statutory document and the duty of the Local Authority to maintain these plans has not changed.

The reorganisation of the separate specialist teams into one integrated 0-25 service will create one single point of referral, reduce documentation, provide a more co-ordinated approach and reduce duplication of staffing in service support. It will enable schools to have one agreement with the whole service to meet their pupils needs, and be more responsive when children and young people with more complex needs are admitted.

The final model proposed for the consideration of the executive emphasises that there will be close collaboration and joint working work with the Prevention and Early Help area locality teams but that the SEND service will continue to be centrally deployed in order that it can be more responsive and targeting where there is more need across the district.

The proposals will, therefore, lead to improved access and referral to the specialist teaching and support service education and associated services including the curriculum, and wider school activities, while providing improved facilities and equipment.

The overall aims of Bradford's Accessibility Strategy and the way they will be met are as follows:

- Curriculum: Increasing the extent to which disabled pupils or prospective pupils can participate in the curriculum.
Due to the teams being co-located within areas with Prevention and Early Help these proposals will deliver advantages and improvements for the children and young people with SEND across all settings as their access to the specialist support services will be easier within their local community
- Physicality: Improving the physical environment of schools through targeted specialist advice and support provided by the specialist integrated teams about the environment will increase the extent to which disabled pupils can make progress with their learning and improve their outcomes.
- Information: Improving the provision of information in a wide range of formats for disabled pupils.
Local area support and information in a wide variety of formats on associated services, activities and help can be tailored to the communities that children and families live in and so provided greater knowledge and access and because of the integration of the SEND specialist teams and the alignment to Prevention and Early Help communications and information should be more streamlined, joined up, with a reduction in duplication and information overload by separate teams.

2. Improved access to specialist staff, both education and other professionals, including external support and outreach services

The creation of two 0-25 teams under one SEND service – the SEND Inclusive Education Service which would include high incidence SEND along with Early Years specialists, Portage and post -16 personal advisers; and one for low incidence SEND, rather than the current structure of a number of separate teams with their own administration, financial support and management in two different service areas will provide a more joined up, efficient, district wide approach to raising outcomes of SEND children and young people from birth to 25 years of age across the district.

The proposed SEND Inclusive Education Service will be centrally deployed but work closely with the four area locality teams proposed in the Prevention and Early Help. There will be a much clearer pathway for any referrals, there will be better communications and shared systems between services so they can join their offer up for children, young people and families and make them more efficient and seamless. Families, schools and other service users should have an easier referral pathway into the new integrated 0-25 service and who they need to contact and should get a more timely response.

The creation of 0-25 specialist teams also means that children and young people will benefit from the continued support of the full range of training and qualified specialist staff from birth, through education and careers and transition support into further education and employment.

3. Confirmation of how the proposals will be funded and the planning staffing arrangements put in place

Both the proposed SEND Inclusive Education Service and the Sensory and Physical Needs (Low Incidence) Service will be funded from the high needs block for 70% of the total cost of the teams to enable them to deliver statutory work. The income generation will need to come from the non-statutory teams in the new structure. Income can be generated through delivering consultancy and, training and resources to support schools, settings and colleges to deliver a high quality offer to all SEND children and young people. Note: EHCPs are a statutory document and the duty of the Local Authority to maintain these plans has not changed.

The staffing for the teams will comprise the majority of the staff that are currently employed within the teaching support teams. These comprise:

- Autism Team
- Cognition and Learning Team
- Social, Emotional and Behavioural Difficulties (SEBD) Team Physical and Medical Team
- Sensory Team (which covers hearing and visual impairment and multi-sensory impairment).
- Portage
- Early Years Intervention Team
- 0-7 SEND team

Appendix 3



**City of Bradford Metropolitan District Council
Evaluation of SEND Transformation Consultation
March 2018**

www.peopletoo.co.uk

Contents

1. Introduction and Context.....	27
2. Summary of Proposals.....	27
3. Summary of Consultation Activity.....	28
4. Summary of the Key Findings – The Consultation Survey.....	29
5. Executive Summary of the Key Findings Across the Consultation Methods, and issues for the Council to Consider	35
6. Appendices	Error! Bookmark not defined.

1. Introduction and Context

Building on our work with the Council and its partners to undertake a review of Prevention and Early Intervention in Bradford in 2017, Peopletoo were asked by the Council to submit a proposal to undertake an analysis of the SEND Transformation Consultation undertaken by Children’s Services which ended on February 28th 2018.

Local residents, partners and staff were invited to submit their responses to the proposals via an email link provided on the Council’s website.

This report represents an overview analysis of the findings of the consultation.

Peopletoo would like to thank the City of Bradford Metropolitan District Council for the opportunity to undertake this work.

2. Summary of Proposals

This consultation focussed on a proposed new way of delivering Specialist Teaching Support Services to children with Special Educational Needs and Disabilities (SEND).

In the last 2 years the number of children and young people who have been put forward to be assessed for SEND has gone up by 60%. Many of these children have more complex needs. There has also been changes in the way that the government provides funding for children and young people with SEND. The impact of this is significant on the High Needs Block with the HNB spending forecasted to exceed what is available by approximately £2m per year for the next four years.

This therefore requires a model of SEND Specialist Teaching Support Services which uses the resources available in the best possible way.

A model was presented to the Council Executive in June 2017 to restructure SEND Specialist Teaching Support Services; however, as a result of feedback and responses during consultation particularly from schools, parents, internal staff teams and national organisations these proposals

have been changed to reflect this feedback and a fairer funding model across all ages ranges from 0-25 years of age.

This proposal restructures the current SEND specialist teaching support services into a 0-25 Inclusive Education Service for children and young people from 0-25 years of age as outlined in the SEND Code of Practice. This model will have two teams who will work closely together to deliver support through a single referral system:

- One team to support high occurring / high incidence needs such as autism, learning needs and social, emotional and mental health needs
- One team to support low occurring / low incidence needs such as hearing impairment, visual impairment, multi-sensory impairment and physical and medical needs.

There are two key implications to these changes in terms of service resource:

- There would be fewer specialist teachers and practitioners employed to support children, schools and families.
- To afford even this lower level of staffing, the team would need to generate 30% of their running costs. This would be done by charging for training and other advisory services we supply to schools, nurseries and others. Parents and families would not have to pay for any services.

3. Summary of Consultation Activity

The consultation process included consultation events (day and evening sessions), a consultation questionnaire, a letter to parents/carers and families with an EHCP and the opportunity for members of the public and partners to contribute their views via an email facility. All consultation material and briefing sessions were advertised through Bradford Schools Online (BSO), Council's Consultation and Engagement Webpage, through the Family Information Service as well as material being sent to all education settings and libraries.

178 people completed the consultation survey. Appendix 1 to this report gives the full detail as to the capacity in which people responded to the questionnaire, but 56% of these (80 in total) identified themselves as parents, 11% (15) as children with complex health / disabilities, 3% (4) as a young person in education. The strongest representation beyond these groups were schools, which in total accounted for 51% (78) of responses. Respondents could identify themselves in more than one category.

A total of 168 emails were received, a number of which from organisations were submitted with detailed responses attached as reports that suggested a number of meetings that has taken place within organisations to provide a response to the consultation. 96 emails were from parents. Just under 200 people attended an engagement event, including over 60 young people and over 100 parents.

Additionally, an online petition submitted entitled "Save Bradford's SEND Teaching Support Teams" signed by 2,053 people as of March 1st 2018.

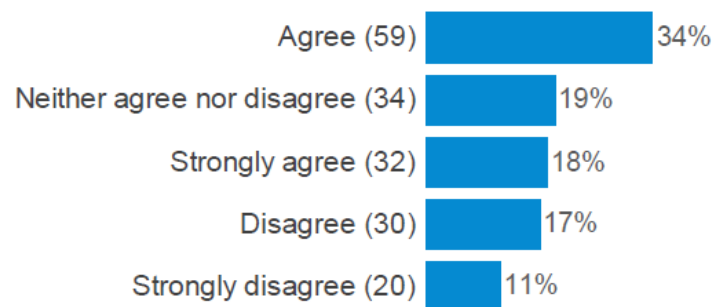
There were some comments received about the consultation process itself:

Key points included:

- It was stated that letters sent to parents inviting them to consultation meetings were only received a few days in advance. These events were initially only held during the day, which meant that a number of parents were unable to attend. The short notice provided was felt not sufficient to allow parents to arrange childcare or time off work. Feedback received is that additional sessions were added to the timeline at the request of stakeholders.
- There were concerns about whether only the families and children with an EHCP have been contacted, as the changes could potentially impact on children without ECHPs if the service they receive is traded out to schools.

4. Summary of the Key Findings – The Consultation Survey

4.1 To what extent do you agree or disagree with creation of an integrated 0-25 years high incidence/high occurring SEND teaching support service to support children and young people who have autism, additional learning needs and difficulties such as social, emotional and mental health needs?



52% either agree or strongly agree with this proposal; 28% disagree or strongly disagree.

Summary of Responses

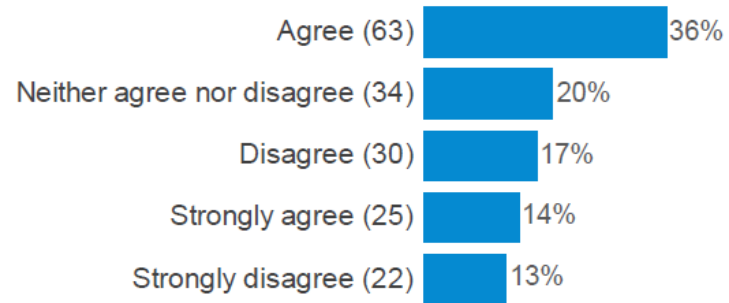
Support for Proposal

- Where there was support for the proposal, this was predominantly because it was felt that services would be more accessible by streamlining systems and processes.
- In particular, it was felt that the proposals would reduce the amount of referral documentation that would need to be completed.
- Some respondents agreed with the separation of resources to support high and low incidence needs.
- Some respondents were supportive in principle of a more co-ordinated approach but had concerns about the resource to deliver it.

Concerns Raised

- There was a general concern about a further reduction of service resource from respondents who felt that there was not enough resource allocated to the SEND agenda already, and given that there is a growing population of children and young people in Bradford and hence a growing population of those with SEND. Some of these concerns were from parents who had experienced difficulties in accessing assessments for services or services themselves, who had concerns that any reduction in resource would exacerbate this.
- There were concerns that proposed staffing structures would not meet the SEN improvement test.
- Some expressed a concern about the longer-term impact on children and young people of reductions in resource to meet short to medium term budget pressures.
- There were a number of concerns around the reduction of specialist teaching posts, predominantly around the loss of these specialisms that may lead to a more diluted service.
- One response suggested that the service delivery structure needed to be more proportional between high and low incidence, suggesting that the proposal did not achieve this.
- There was a concern about the access to services for children who do not have a formal diagnosis of Autism, or one of the other widely recognised conditions, and that they are at risk of falling through the net and not getting access to the level of support which they need.
- There were a significant number about the reduction of portage services, in particular from parents. There was concern that alignment with locality teams as part of the Prevention and Early Help proposals could leave Portage workers isolated within these teams.
- There were some concerns that a 0-25 service may not prioritise needs at particular ages when these needs may be different, and some were keen to see more detailed proposals that made this differentiation. Some preferred a model based on age groups.
- In particular there was a question about what support would be put in place to enable young people to make the transition to adulthood.
- There was a concern about the requirement to achieve 30% of funding through trading services to schools, particularly if some schools were more willing to pay for services than others, which may lead to an inequity of provision.

4.2 To what extent do you agree or disagree with creation of integrated 0-25 years low incidence/low occurring SEND teaching support service to support children and young people with hearing impairment, visual impairment, multi-sensory impairment and physical and medical needs?



50% either agree or strongly agree with this proposal, 30% disagree or strongly disagree.

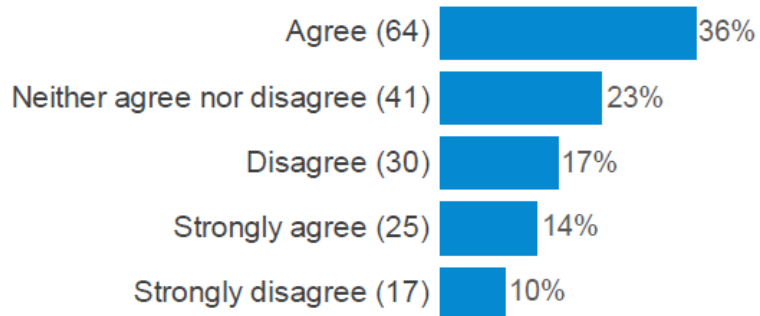
Summary of Responses

Support for Proposal

- Support for this proposal included an acknowledgement that the needs of this group should be identified more quickly and result in better outcomes for children and young people.

Concerns Raised

- Many of the concerns about this proposal were reflected in the answers to the similar question about the creation of a team to support high incidence / high occurring cases, namely a general concern about a further reduction of service resource, the need for the service delivery structure to be more proportional between high and low incidence, and how realistic it was to achieve 30% of funding through trading services to schools, particularly if some schools were more willing to pay for services than others.
- Alternatively, there were concerns that a mainstream school may refuse a child if it meant having to pay for additional support, resulting in the child having to go a specialist school when mainstream may have otherwise been more appropriate to their needs, or that a child would be accepted but then the support not put in place. It was stated that this then increases the number of children who are home schooled or require their parent / carer to seek schooling outside of the area.
- Similarly, for children with SEND already attending mainstream school, there was a concern that should the proposals be approved and hence the requirement for schools to, pay for some services, some children may not be able to remain at their school, causing significant disruption to their learning and distress.
- Some respondents required clarity about how the service would address support a child whose needs were across the two proposed teams.
- There were concerns that a reduction in staffing resource may result in a longer wait for assessment.



4.3 To what extent do you agree or disagree with the model which comprises of two teams who will work closely together and will have a single point of referral to simplify the process for families, schools and external agencies?

50% either agree or strongly agree with this proposal; 27% disagree or strongly disagree.

Summary of Responses

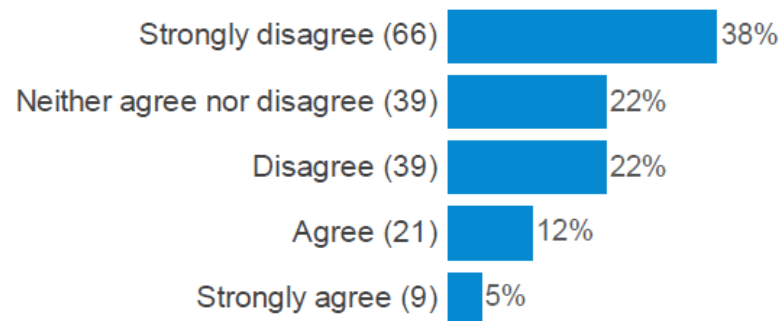
Support for Proposal

- Support for this proposal was predominantly agreement to a single point of referral as it would make referral easier and access to services quicker.
- In particular, it was stated that a single point of referral would help parents to gain the help they need without having to keep repeating the same things to different teams of people

Concerns Raised

- Some parents / carers still preferred the concept of referring direct to a specialist service for a specialist need as a one point of referral would still require a “hand off”.

4.4 To what extent do you agree with the alignment of the proposed SEND teaching and support services model being aligned with the Prevention and Early Help proposals. This would mean some services will be district wide and some based within four local areas, Bradford South, East and West and the combined Shipley and Keighley areas?



60% either disagree or strongly disagree with this proposal; 17% agree or strongly agree.

Summary of Responses

Support for Proposal

- Support for this proposal included the idea that locality teams can work together to address issues that are specific to that locality and develop strong links with the professionals in that area.

Concerns Raised

- The majority of the concerns relating to this question focussed on the breadth of the localities that the services within the scope of the Prevention and Early Help proposals would be expected to cover, and what impact this may have on the quality of time spent with families.
- There was, however, a concern that some localities have a higher level of need and that the locality model could lead to disparity of workload amongst if each team has the same number of staff but very different geographical needs.

5. Executive Summary of the Key Findings Across the Consultation Methods, and issues for the Council to Consider

The response to the 0-25 SEND Transformation consultation was considerable in respect of the level of depth and detail of responses. Whilst there were a number of responses in support of the principles of the proposals, reflected in the fact that, out of the four questions in the consultation questionnaire, three of these incurred more agreement than disagreement, and only one – the proposal to align SEND to the proposed Prevention and Early Help area model – elicited a majority disagreement. There was therefore majority agreement, in the consultation questionnaire at least, around the creation of the high incidence / low incidence teams and the concept of a single point of referral.

However, going forward, the consultation has raised a number of key areas to consider.

This section summarises these. It incorporates and summarises the responses to the consultation questionnaire in Section 4, additionally including the final question “Please use the box below for any further comments you would like to make”, as well as the responses received by email and through consultation events.

5.1 Reductions in Resources

A number of concerns raised were predominantly about reductions in resource for SEND services. Many parents spoke of the importance of the support their child receives and the impact that this has on their lives, beyond helping with educational attainment, but also on working to ensure that their child feels included, grows in confidence and is supported to develop life skills. The basis of these concerns can be summarised thus:

- The fact that the demand for services was increasing, as stated by the narrative that supported the consultation documentation.
- Concern that the reduction in staffing numbers and Specialist Teachers would lead a dilution of service and leave schools stretched to meet children's needs.
- Some parents that reductions in resource could lead to delays in assessment and diagnosis; some expressed concern that there was a delay already and that budget cuts could exacerbate this.
- Some respondents challenged the reduction in spend on SEND on the basis that the client group was one of the most vulnerable, and hence challenged the reductions on an ethical basis. Some respondents felt that there may still be other areas of Council spend that could be reduced before SEND services.
- Some staff asked for consideration to be given to flexibility in terms of the working week, for example a 4-day week or offering reductions in salary in return for increased annual leave, as an alternative to saving money.
- There was a concern about the reduction in Business Support, as it was felt that this would mean that teachers and non-teachers would have less direct contact time with schools and pupils as they will be required to pick up additional administrative duties, whilst also impacting on the capacity of service management.

5.2 Compliance with the legislation and the SEND Improvement Test

Some respondents urged that the proposals must not impact upon the Council's capacity to fulfil its statutory functions, as defined in Section 22 of the Children and Families Act 2014; and Part 2, section 11 of the Special Educational Needs and Disability Regulations 2014, and referenced the SEND Improvement Test.

There were wider concerns about the potential for an increase complaints and legal challenges to decisions about provision and a reputational risk to the Council.

5.3 Reduction in Specialist Support to Schools

There were concerns that the proposals meant that schools may not have sufficient specialist support and that their breadth of knowledge and expertise may not be sufficient to support the wide range of learning and social difficulties that SEND children face. As a result, many parents were keen to safeguard specialist support to schools in order to support mainstream teachers to support children.

The predominant concern from a number of parents was that schools may be less inclined to admit children with SEND needs if the

felt unable to effectively support them or if they would have to pay more to do so, and that this may mean that children who would otherwise have been able to manage in a mainstream environment may have to go to specialist provision. This would have implications for their outcomes as well as be an additional cost to the Council by ultimately having to provide more specialist provision.

Further points included:

- That a reduction in specialist support was exacerbated by wider reductions in funding to schools that has resulted in reduced numbers of support staff who would otherwise have provided capacity to support SEND children in schools.
- An ‘inclusive teaching’ training package was proposed that could support teachers to develop some of the required skills in the mainstream classroom. This would help to mitigate the reduction in specialist support by increasing skills and knowledge capacity in schools.

5.4 Portage and the Impact on Early Identification

There were significant concerns about any reductions to Early Intervention and the role of the Portage Service, and, wider than this, on early intervention. Key points included:

5.4.1 Early Identification

- Early identification was seen as vital as it supports wider family and SEND issues and supports school readiness.
- Early Intervention had been praised for its positive impact due to the integrated approach of different specialists; there were hence concerns that the reduction in staffing may have a negative impact on this.
- The work undertaken by the Early Intervention Team was also seen as pivotal in undertaking the Council’s statutory duty in relation to identifying pupils with SEND. There was a question about whether this service would be best placed with the Identification and Assessment team within SEND, rather than the high incidence team.

5.4.2 The Portage Service

- Many parents responded passionately about the support that they had received from the Portage Team, in particular the emotional support that they had received to come to terms with the needs of their child, and the impact on the emotional and mental health of both the parents and siblings. They were very concerned that both they and other parents may see a reduction in this support.
- It was stated that the high number of active cases and waiting lists of both the Portage Team and the Specialist Teacher indicate a need for the work to continue in its current form.
- Portage was seen as providing a key worker role that supported families in negotiating a complex range of transitions in early years not only linked to age but also provider e.g. home-portage-2yr provision (pvi)- 3yr nursery (school)-reception (school). It was felt that this supported school readiness and reduced the numbers of failed transitions.
- In addition to this, the Portage Team were seen by many parents as key in signposting them to additional support and supporting referrals. The Early Intervention Team was seen as completing a largest number of requests for EHCA's as well as building capacity in settings and schools to identify and assess put the plan into practice.
- Some parents also talked of being supported to adopt a 'can do' attitude, developing their confidence and skills to support their child whilst also negotiating the complexity of provision. The fact that the service was delivered in the home was also significant to many.
- Furthermore, it was stated that Portage is the only service that responds before the EA1 notification.
- One respondent felt that keeping the team central would ensure the expertise of individuals and the team approach would continue rather than the preferred option which was felt to split the team across the district.

5.5 Proportionality of Resource Between High and Low Incidence

- Some respondents questioned why it is proposed that there are similar numbers of specialist teachers in the low incidence teams as in the high incidence teams, given that the high incidence teams would likely be responsible for much higher numbers of children and in many cases, more complex need.
- It was therefore felt by some that the core offer for pupils with high incidence needs would be disproportionately lower than for pupils with low incidence needs.
- It was felt that children with high incidence needs require highly specialist staff to meet their complex needs in the same way that children with low incidence needs do. There appeared to be very clear and specialised roles in the proposed low incidence team whereas, in the high incidence team, specialist teachers and practitioners are not identified by their specialisms.
- Some services that align more naturally to the low incidence team did not object in principle to the bringing together of the low occurrence needs of children and young people into one team. However, they did have concerns regarding the capacity the low incidence team to respond to demand.
- There was a desire for clarity about how the needs of a child or young person who had both high and low incidence needs as defined in the structure would be met.

- There were no objections to a single point of referral, but some specialist services urged that those in this team had sufficient knowledge of specialist areas to be effective.

5.6 Alignment with the Proposed Area Based Model of Prevention and Early Help

There were concerns about the plan to use the proposed model of area working based on the four areas (Keighley/Shipley, East, West and South) for high incidence/occurring special needs. Key points included:

- The staffing model proposes that each area will have a team of the same size. However, there it was felt that there is not an even distribution of numbers of pupils requiring access to SEND services across these areas. This could mean that areas with high numbers of pupils accessing this service are at a disadvantage because of greater numbers compared to a locality with fewer numbers accessing services.
- It was therefore suggested that if such a model is adopted, resources are allocated by level of need in each locality.

5.7 The Role of Specialisms

Generally, there was concern about the loss of specialisms and the impact upon specific groups, summarised by one respondent as “will the final job profiles for specialist teachers indicate the specialism required?”

Concerns raised about the impact of the proposals on some particular specialisms included:

5.7.1 Cognition and Learning

- There was also a concern about whether the fact that cognition and language needs often co-exist with or underpin other needs was recognised, and that because these cases may not primarily have a medical need, these needs risked being overlooked.
- Cognition and Learning assessment was also seen to identify learning and language needs that may not yet be known, or which are hidden, and require specialised assessment. These assessments inform ECH assessments – it was felt that, currently, the educational psychology service are unable to meet the demand for this and hence teachers are regularly requested by schools and the SEN Team to carry out cognitive assessments to support the statutory assessment process.
- There was hence a concern that reduced specialist teacher capacity will make it more difficult to meet compliance targets.

5.7.2 Dyslexia

- It was stated that a specialist qualification (Level 7 Diploma) was needed together with registration with the British Dyslexia Association to diagnose and teach pupils with dyslexia.

5.7.3 Visual Impairment

- The need for specialist staff who understand the needs of children and young people with vision impairment was felt to be important, otherwise children with these needs risk being excluded from activities they may otherwise have been able to participate in.

5.7.4 Hearing Impairment

- The need to support parents at the point of early diagnosis of hearing impairment was felt important, alongside the management of hearing loss, the availability and utilisation of hearing aids and monitoring of speech and language development.
- It was felt unclear whether the specialist staff currently supporting early years and school age deaf children would have the necessary expertise to work across a whole range of offers for post 16 deaf young people.
- There were concerns that the proposed structure for the High Incidence Needs team includes a post 16 transition officer, but the Low Incidence Needs team does not.
- Given that the proposed service will expand to include children and young people from the ages of 0 to 25, there were concerns that Teachers of the Deaf will be expected to support more young people with no additional funding or staff.

5.7.5 Autism

- Representation was also made by parents of children with autism with concerns that that schools would not be resourced to meet growing need and that this could ultimately have an impact upon adult services when the young people transition.
- One respondent quoted the National Autistic Society's 'Held Back' campaign, which warns that cuts will not lead to inclusion or the better provision of services.

5.7.6 Down Syndrome

- Representation from Down's Syndrome Bradford urged the importance of maintaining a commitment to the inclusion agenda, quoting research which demonstrated the significant gains made in understanding, speech, language, social skills, appropriate behaviours, reading, number, general knowledge, expectations of, and inclusion in, everyday society.

- This includes the importance of children being educated in the mainstream with the view that they will be living their adult lives in this context. This therefore required appropriate provision within mainstream schooling.
- Down Syndrome Bradford also suggested that Designated Specialist Provision within a mainstream primary school be established to provide places for children with Down syndrome and other MLD, providing them with the option of maintaining a semi-mainstream education but with more specialist provision. This could then act as a centre of expertise and best practice for other schools.

5.8 The Feasibility of Trading Services at 30%

There were a number of concerns about how feasible it was for the service to generate income at the required level of 30%. These can be summarised as:

- Firstly, some schools required more detail about which services would be traded, and how much these would cost. There was a concern that if it was the more expensive equipment that was “traded”, this could incur a considerable cost to individual schools who may have a need for a number of these items. Or, there was a concern that some “essential” services may be traded, and not just those that were additional or specialist.
- There were many comments about schools’ budgets already being stretched and whether they would then be able to pay for these services.
- This then led many parents to have concerns about whether schools would still take children with SEND needs if they knew that they may have to pay for additional services to meet their needs.
- Some responses urged the Council to factor in the challenge of trading services based on the experience of some services that have gone down this route but then received little take-up. A question was asked how the 30% was being modelled, and what would happen if this target was not met.
- Additional suggestions for income generation included providing training for employers, gaining sponsorship for some activities, and exploring the potential of facilitated online forms, webinars, Skype conversations and engaging e-learning to provide some services at a lower cost.
- It was suggested that “trading services” was part of a wider specialism of “commercialisation” of Council services, and that this may need some independent support, as well as looking across other Councils who are already trading services to understand the “lessons learnt”. Added to this, some parents were concerned that staff will be left to market their services which was not their area of expertise and may take them away from face to face delivery.
- Some schools suggested that a flexible model of support at the point and time of greatest need is retained with a fixed annual contribution to this, with schools should be able to request support when needed, rather than services be traded, as the costs were more predictable.

Appendix 4

Equality Impact Assessment Form

Department	Education, Employment and Skills	Version no	Final draft
Assessed by	Lynn Donohue and Angela Spencer-Brooke	Date created	First draft
Approved by	Judith Kirk	Date approved	24.10.17
Updated by	Lynn Donohue	Date updated	19 March 2018
Final approval		Date signed off	

The Equality Act 2010 requires the Council to have due regard to the need to:

- eliminate unlawful discrimination, harassment and victimisation;
- advance equality of opportunity between different groups; and
- foster good relations between different groups

Section 1: What is being assessed?

1.1 Name of proposal to be assessed.

Transformation of the 0-25 SEND specialist teaching and support services specifically under consideration is:

Preferred model, which proposes to create one integrated and inclusive 0-25 SEND service with two teams:

- one for High Incidence SEND such as Autism, Cognition and Learning and SEMH as well as those for Early Years and Post-16 for children and young people aged 0-25 years of age and
- one for Low Incidence SEND for children and young people aged 0-25 years of age; this includes hearing and visual and multi-sensory impairment and physical and medical needs. These two teams will work closely together to deliver advice, training and support to children and young people from birth to 25 (where required).

The proposals have been reviewed and revised in the light of feedback received during a consultation period which ran until 28 February 2018. . It has been agreed that a final set of proposals will be presented to the Council Executive in April 2018 to ask that they agree to implement in September 2018.

1.2 Describe the proposal under assessment and what change it would result in if implemented.

The Local Authority offers a range of specialist teaching support services to advise, support and train mainstream schools and specialist settings to meet the needs of children and young people with special educational needs and disabilities (SEND).

Currently, these services are mostly based in the city centre and are funded through the High Needs Block (HNB) (funding which the Council receives from the Government) and employ teachers, specialist practitioners and specialist support roles and Post 16 Personal Advisors.

The staff teams which are part of the final model detailed in the proposals to the Council Executive are:

- Autism Team
- Cognition and Learning Team
- Social, Emotional and Behavioural Difficulties (SEBD) Team
- Physical and Medical Team
- Sensory Team (which covers hearing and visual impairment and multi-sensory impairment)
- Portage
- Early Years Intervention Team
- 0-7 SEND team

These teams currently have their own management arrangements and some sit within different services within Children's Services Department of the Council.

These teaching support services currently offer statutory and non-statutory support in mainly mainstream schools to support the inclusion and the removal of barriers to learning for children across all the prime SEND needs i.e. learning disabilities, autism, physical and medical needs, social, emotional and mental health needs and sensory needs (hearing, visual and multi-sensory impairment).

The proposal is to create one integrated SEND 0-25 service with two integrated teams of staff for children and young people from birth up to 25 years of age, rather than the current arrangements which are separate teams within the SEND and Early Years' services of the Council.

One team will be the High Incidence team which will integrate specialist teachers and practitioners from High Incidence SEND including Autism, Cognition and Learning and SEMH along with Portage, Early Years Intervention team, 0-7 SEND team.

This proposed team will offer early intervention in the home through Portage home teaching for young children; offer support throughout a child and young

person's educational journey in school and offer transition support post-16 into training and further education and post-19 into training and employment.

In addition it is proposed that there will be a low incidence 0-25 SEND team of staff will be created by joining together the current Sensory Team and the Physical and Medical Teams. This team will offer support to children with hearing impairment, visual impairment, multi-sensory impairment, physical and medical difficulties and disabilities.

It is also proposed that this team will offer early intervention in the home; offer support throughout a child and young person's educational journey in school and offer transition support post-16 into training and further education and post-19 into training and employment.

Both of the new teams will work closely together as part of one new integrated service.

This will offer better transitions for children and young people and their families when they move between settings, schools, further and higher education and into employment. The intended result is fewer contacts between different teams and different services in the Council and therefore better and more timely communications with settings, schools, families and their children; a more efficient service, more timely responses to service requests and referrals and overall a more joined up, coherent approach to the children and young people with SEND.

Children and young people with SEND and their families, schools and settings should benefit from the creation of having only two specialist teaching and support teams; with more straightforward access to services, fewer contacts with the different sections of the Council and people and not being passed between separate teams within the SEND services.

In addition, by creating these two teams it means the Council should keep expertise and SEND specialisms within the district. Because we are proposing that the teams will be part funded from the HNB to enable us to continue to provide our statutory duties). The teams that provide statutory services will not be required to generate an income, unless there is capacity within these teams to do so, and this will be from activity such as training which can support schools, their staff and partners to meet the needs of children and young people with SEND. If the new non-statutory work of the 0-25 SEND Inclusive Education Service is unable to generate the shortfall (£1m) income then there is a risk that there will have to be further redundancies. This will be kept under close review.

Section 2: What the impact of the proposal is likely to be

2.1 Will this proposal advance equality of opportunity for people who share a protected characteristic and/or foster good relations between people who share a protected characteristic and those that do not? If yes, please explain further.

Yes - This proposed preferred option is intended to advance the equality of opportunity and improve a range of outcomes for children with SEND 0-25 years-old by providing an integrated specialist teaching and support service for children and young people aged from birth to 25 years in early year's settings, schools and colleges.

The creation of two 0-25 teams under one new integrated SEND service – which would include high incidence SEND along with Early Years specialists, Portage and post -16 personal advisers; and one for low incidence SEND, rather than the current structure of a number of separate teams with their own administration, financial support and management in two different service areas will provide a more joined up, district wide approach to raising outcomes of SEND children and young people from birth to 25 years of age across the district.

It is intended that the proposed SEND Inclusive Education Service will be centrally deployed but work closely with the four area locality teams proposed in Prevention and Early Help. This will mean that there should be an easier and clearer referral pathway into the new integrated 0-25 service and there should be a more timely response; there will be better communications and shared systems between services so they can join up their offer for children, young people and families and make them more efficient and seamless.

The creation of a 0-25 specialist service also means that children and young people will benefit from the continued support of the full range of training and qualified specialist staff from birth, through education and careers and transition support into further education and employment.

2.2 Will this proposal have a positive impact and help to eliminate discrimination and harassment against, or the victimisation of people who share a protected characteristic? If yes, please explain further.

Yes –. The proposals will ensure that all SEND children and young people with a range of special educational needs and disabilities will continue to have access to high quality support from the full range of trained specialist staff. Their access to fully qualified and experienced teachers, practitioners, teaching assistants and other professionals will be improved through the creation of two integrated teams under one SEND 0-25 years service.

The opportunities will be further enhanced as the specialist staff will work more closely together, supporting each other and having access to targeted services and through the close collaboration and joint working with the Prevention and Early Help services who will be area based, communications and joint working with other services will be improved.

2.3 Will this proposal potentially have a negative or disproportionate impact on people who share a protected characteristic? If yes, please explain further.

This is a wide ranging programme of change and involves many people. This has been taken into consideration and for staff their terms and conditions of employment will not change; there may be a change in their work/office base and the geographical location they cover. In these cases we will involve any staff with disabilities and mobility issues in discussions about work locations and bases, for example in relation to where they live and transport arrangements.

For children and young people with SEND and their families there should be no negative impacts as they will have professionals who are working more closely within their communities and with their family, setting or school; they should be telling their story once and fewer professionals are involved; communications should be more simple and straightforward. The final proposals put to the Executive in April 2018 have taken into account the consultation feedback and there has been an increase in the number of specialist teachers and Portage Home Visitors in this final model.

With integrated teams under one service, the services they provide to children, young people and their families will be more joined up, more timely and responsive. The services to settings and schools will be maintained and improved in the same way that is described for families.

The selling of some services to schools will allow them, if they choose to do so, to buy additional support tailored to their requirements, to meet the needs of the children and young people they educate. NB. The Local Authority has the statutory duty to maintain Bradford EHCPs, and this has not changed.

The equality assessment indicates that this proposal is likely; overall, to have no impact or a low impact and that there is no disproportionate impact on any group who share protected characteristics. .

2.4 Please indicate the level of negative impact on each of the protected characteristics?

(Please indicate high (H), medium (M), low (L), no effect (N) for each)

Protected Characteristics:	Impact (H, M, L, N)
Age	L
Disability	L
Gender reassignment	N
Race	N
Religion/Belief	N
Pregnancy and maternity	N
Sexual Orientation	N
Sex	N
Marriage and civil partnership	N
Additional Consideration:	N
Low income/low wage	N

2.5 How could the disproportionate negative impacts be mitigated or eliminated?

(Note: Legislation and best practice require mitigations to be considered, but need only be put in place if it is possible.)

The Local Authority and strategic partners have made significant efforts to mitigate against any negative impacts whilst continuing to use High Needs Block funding to intervene early and promote equality of opportunity and access to specialist support services so that it is used effectively to improve outcomes for Children and Young People with SEND. The provision of integrated high quality teams (for both High Incidence and Low Incidence SEND) of SEND specialists will mean that specialisms and expertise are retained within the district for the benefit of children and young people with SEND and that the Local Authority by funding the service in the majority through the HNB is able to retain a specialist service for the benefit of the children and young people with SEND across the district.

It is important to note that schools have a responsibility to ensure that the needs of their pupils with SEND are met and this has not changed. The Local Authority is committed to working with all our children and young people in Bradford, irrespective of whether they are in academies or free schools, Independent or Private providers and Businesses who provide apprenticeships.

The Local Authority will continue to undertake all of its statutory duties identified in the SEND Code of Practice and this assessment will be updated as and when further consultation is undertaken to analyse any impact on children and families who may use the services and staff providing the services.

Section 3: Dependencies from other proposals

3.1 Please consider which other services would need to know about your proposal and the impacts you have identified. Identify below which services you have consulted, and any consequent additional equality impacts that have been identified.

The stakeholder consultation plan set out as Appendix 4 in report to Executive dated 9 January 2018 has been implemented in full.

Section 4: What evidence you have used?

4.1 What evidence do you hold to back up this assessment?

The first Executive Report and accompanying evidence was discussed on 20 June 2017. As part of this extensive evidence and data was used including the incidence of SEND across the district and by type, the number of referrals and by age and type of special needs, the number and geographical spread of Education and Health Care Plan assessments and by ward some of this is included or referenced in the executive report. In addition, the findings from a survey to schools in July 2017 about SEND Specialist services have also been taken into account in framing these proposals. A second report was presented to the executive on 9 January 2018 and a period of public consultation until 28 February 2018.

- 178 people completed the consultation questionnaire, of which 56% were parents, 11 % were children with complex health / disabilities, 3% were a young person in education. The strongest representation beyond these groups was schools, which in total accounted for 51% of responses.
- 168 emails were received in total, of which 96 emails were from parents.
- Just under 200 people attended the engagement sessions, which included over 80 young people and over 100 parents.

An online petition was submitted, entitled “Save Bradford’s Teaching Support Teams” signed by 2053 people as of 01 March 2018

An SEN Improvement Test has been updated and is at Appendix 2.

4.2 Do you need further evidence?

No, an initial engagement on the proposals ran from 2 May 2017 to 6 June 2017. A wide range of stakeholders were consulted and we received a significant number of comments and questions. All of these have been reviewed, and as a result of this changes and amendments were made to the initial proposals. An Executive Report was discussed at the Council Executive on 20 June 2017.

Following this meeting a period of consultation started on 26 June 2017 due to run until 31 August 2017. As a result of feedback and responses during this consultation period revisions were made to the initial proposed model.

A number of options were considered which resulted in the Council's preferred option 3 being developed. These revised proposals went to the Executive on 9 January 2018. Executive agreed a further period of formal consultation until 28 February 2018.

Section 5: Consultation Feedback

5.1 Results from any previous consultations prior to the proposal development.

A summary of the responses from the initial consultation 2 May until 6 June has been attached to this document – 'Responses to initial consultation'. Note also paragraph 4.2 above regarding the formal consultation period.

During the initial consultation period a total of 79 responses were received containing a total of 16 comments and 144 questions:

Respondent	Number of responses	Comments	Questions
Internal staff Teams	72	7	121
Schools	3	2	2
VCS	2	5	19
Parent	2	2	2
Overall	79	16	144

5.2 The departmental feedback you provided on the previous consultation (as at 5.1).

As a result of this initial engagement period 2 May until 6 June some changes were made to the staffing of the then proposed Centres of Excellence.

As a result of feedback and responses during the consultation period 26 June to 31 August 2017 further revisions to the proposed model have been made and these will be presented to the Executive in January 2018.

5.3 Feedback from current consultation following the proposal development (e.g. following approval by Executive for budget consultation).

Council Executive met on 9 January 2018 to consider further options and in particular to discuss the preferred Option 3. A further formal consultation period was held between 17 January and 28 February 2018.

Consultation Findings – March 2018:

To ensure a transparent analysis of the feedback following consultation, the Council commissioned Peopletoo to undertake this piece of work. Peopletoo reviewed all the views of residents, partners and affected teams through a variety of methods, including an online questionnaire, consultation events and a dedicated email facility where views could be contributed.

The consultation focussed on a proposed new way of delivery services to children with Special Educational Needs and Disabilities (SEND).

In summary:

- 178 people completed the consultation questionnaire, of which 56% were parents, 11 % were children with complex health / disabilities, 3% were a young person in education. The strongest representation beyond these groups was schools, which in total accounted for 51% of responses.
- 168 emails were received in total, of which 96 emails were from parents.
- Just under 200 people attended the engagement sessions, which included over 60 young people and over 100 parents.
- An online petition was submitted, entitled “Save Bradford’s Teaching Support Teams” signed by 2053 people as of 01 March 2018

Overall 52% of respondents agree or strongly agree with the proposals to the creation of an integrated 0-25 high incidence / high occurring SEN teaching support service. It was felt that services would be more accessible by streamlining systems and processes. In particular it was felt that the proposals would reduce the amount of referral documentation that would need to be completed. Respondents were also supportive in the principle of a more co-ordinated approach.

The predominant reasons for concerns about the proposed model were:

- the reduction of service resource, respondents felt that there was not enough resource allocated to the SEND agenda already;
- current waiting times for assessments, a reduced service will mean waiting times will become longer;
- the reduction of specialist teaching posts may lead to a more diluted service;
- the service delivery structure needed to be more proportional between high and low incidence;
- concerns about the reduction of Portage services (in particular from parents) and alignment to locality teams as part of the Prevention and Early Help proposals could leave Portage Workers isolated;
- the requirement to achieve 30% of funding through trading / selling services to schools, may lead to an inequity of provision.

It is recommended to progress with the preferred model, below we set out the key elements of the proposed model and outline the changes to be made as a result of consultation.

Key elements:

- 0-25 SEND Inclusive Education Service made up of two teams. Single point of referral and cut out duplication and improved transition;
- High incidence / occurring special needs team aligning to the proposed Prevention and Early Help proposals;
 - Autism
 - Cognition and Learning
 - Social, Emotional and Mental Health
- Sensory and Physical Needs team for low incidence / occurring SEND:
 - Hearing impaired, visually impaired and multi-sensory impairment
 - Physical and medical
- Revised financial modelling has been based on a 70% funded model from the HNB and 30% income generated through selling services to schools;
- Potential reduction of 25 – 30 FTE across affected teams.

Response:

- 52% of respondents agreed or strongly agreed with the creation of one integrated team;
- The new 0-25 SEND Inclusive Education Service (both high and low incidence teams) would continue to be managed centrally; staff will be deployed across the District according to the level of need within each locality. The service would need to have strong partnership working with the proposed Prevention and Early Help area locality teams.
- Although there are no changes in the overall staffing reductions, the following changes have been made to the structure in light of feedback from parents and partners:
 - Portage Home Visitors has been increased from four to six;
 - Early Years Specialist Practitioners reduced from four to three;
 - Access and Inclusion Officers reduced from four to three;
 - Specialist Teachers has increased by two, from 16 to 18

- Removing the four Locality Leads and replacing them with two Lead
- Specialist Teachers (with a 25% specialist teacher caseload)

The staffing model of the new 0-25 years SEND Inclusive Education Service proposed in the Executive report on 9 January 2018, was modelled on 70% being funded by the HNB and 30% of this being income generation. Pressure on the HNB is significant and has not changed. A working group including a number of school leaders, SEND specialists and senior Council officers are looking at a number of options for income generation and the suggestions made in the consultation process will be considered

Appendix 5

Consultation details with Trade Unions in respect of SEND Review Proposals

4C1 Education Services

Budget line detail

Education Services – From 2017 part of the Dedicated Schools Grant will be passed directly to schools. There will therefore be a reduction in Council spending but no reduction in base budget. The proposal is included here as there could be staffing implications.

<u>Trade Union Feedback</u>	<u>Management Response</u>
<p>7.12.17 - Level 1</p> <p>Union requested more clarity on when structures would be circulated and whilst accepting the review is complex, they were concerned that staff did not know who or how they were affected by these proposals so they are unable to consult with staff.</p>	<p>7.12.17 - Level 1</p> <p>MJ confirmed 4C1 was a continuation of work in progress and that consultation has already commenced on the main proposal (4C2) about the Early Help and SEND review and a further Level 2 meeting has been scheduled for this afternoon but more information and more detail on the staffing implications will be available next week.</p> <p>The SEND review will be the subject of a report to the Executive in early January as revisions to the original proposals have been made following feedback from the public consultation in summer 2017.</p> <p>There has been an increase in demand for SEN but also a funding problem and so this is driving the move to a locality model as well as the need to achieve savings of £400k. Schools can commission these services but the funding is beyond our control. We need to market these services more aggressively to Schools. A Project Team is currently looking at efficiencies that can be made to achieve this. The additional funding reductions equate to 27 FTE posts and this is due to a reduction in Schools Forum funding that is held by the LEA to discharge our responsibilities.</p>
<p>Level 2 - 21/12/17</p> <p>NEU asked for a list of affected staff.</p>	<p>Management to respond</p>

<p>NEU noted the likely FTE reduction of 27 – were TU’s aware of this.</p>	<p>Management confirmed this and that it was part of the SEND proposals. The Chair confirmed that there were no proposed cuts in Children’s which had not already been announced. There will be some savings in the Complex Health and Disabilities Team but no detail is available yet.</p>
<p><u>Joint Level 3 - 04/01/18</u></p> <p>A further request was made from Union colleagues for the list of SEND affected staff to be issued ASAP.</p>	<p>Management noted the requested and JK advised that the list of staff will be issued.</p>
<p><u>Level 2 - 11/01/18</u></p> <p>As above NASUWT advised list of staff not received.</p>	<p>Chair asked that this is provided by close of play Friday 12 January.</p> <p>Circulated on 12/01/18.</p>
<p>Unison noted a SEND report was going to Council next week. Have any dates been set up to brief affected staff.</p>	<p>Staff were briefed on 13 December 2018, prior to the publication of the Council Executive Report on the 0-25 SEND Transformation on 29 December 2017.</p> <p>A report was presented at Council Executive on 9 January 2018 seeking approval for an extended period of formal consultation and this was approved to run from 17 January - 28 February 2018.</p> <p>A presentation on the 0-25 Consultation was also shared at Schools Forum on 10 January 2018.</p> <p>A manager briefing was held on 16 January prior to the formal consultation re-commencing.</p> <p>The O-25 Transformation will be presented for comment at Overview and Scrutiny on 14 February 2018.</p>
<p>NEU asked if the Complex Health and Disabilities Team was the same as the Physical and Medical Team.</p>	<p>The Complex Health and Disabilities Team are part of Children's Social Care. The Physical and Medical Team are a teaching support service and are part of the education teams within Education Employment and Skills.</p>
<p>Unison asked when the structure would be shared.</p>	<p>HR noted SEND did have staff briefings before Christmas which were well attended and it was clear about which staff were in scope. Structures were not available for today. SEND proposed structure and job profiles will be presented by 1 February for comment by the end of February.</p>
<p>Unison asked when the SEND consultation would close.</p>	<p>Management advised this would be shared at the Level 3 meeting on the 1 February.</p> <p>Management will present the following draft structures and profiles by the 1 February for comments by the end of</p>

	<p>February:</p> <ul style="list-style-type: none"> • Learning Environments including traded service teams and targets • Service support across EES • SEND
<p>NEU noted the Teaching and Learning Consultants were expected to be 100% traded from a position on 0% traded. How much income is needed.</p>	<p>Management will present the following draft structures and profiles by the 1 February for comments by the end of February: Learning Environments including traded service teams and targets.</p>
<p>Unison asked for more detail on what we will and will not be providing.</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 153</p>	<p>Management advised the 3 job profiles would be sent on Monday and the public Prevention and Early Help consultation would close on the 12 February but we can continue discussions regarding proposed structures and draft profiles. The remaining structures will be brought to the meeting on 1 February.</p> <p>Management will present the remaining draft structures and profiles by the 1 February for comments by the end of February:</p> <ul style="list-style-type: none"> • Learning Environments including traded service teams and targets • Service support across EES • SEND
<p><u>Joint Level 3 - 01/02/18</u></p> <p>UNISON expressed concerns that there is confusion around this with things getting mixed up.</p>	<p>Management has re-stated key comms and milestones across affected teams. We will also clarify through the staff briefings planned next week to which TUs are invited.</p>
<p>UNISON asked within the four proposed areas had there been a breakdown of potential families who receive these services?</p>	<p>Management has analysed where the hotspots are.</p>
<p>UNISON asked if there were any changes within this area?</p>	<p>Management said this was all inclusive with the high and low incidence teams. Management said that they would include the information on SharePoint after this meeting.</p>

<p><u>Level 2 - 08/02/18</u></p> <p>Unison raised concerns about the consultations being mixed up and asked if some communication could be circulated to separate it out. Felt the restructure needed to be slowed down as staff are struggling to understand.</p> <p>Staff don't understand where they are.</p> <p>NEU also had concerns from staff about not understanding how they were affected so had not been asking questions, e.g. traded services, children's centres.</p>	<p>Management advised SEND and Behaviour are part of the assessment and achievement services. Early Help is about meeting needs early on. These are the two strands and across the top of this are the enabling and business functions. It is proposed the Faith Tutors move to a traded service and sit in that arm and staff are aware of this. Some work has been done around working to a traded service model.</p>
<p>Unison felt that the SEN proposals could go through but the EH proposals would take longer as would also need to work with HR on how assimilation would work.</p>	
<p>Unison asked if the EH proposals could move to January so that SEN could be dealt with first.</p>	<p>Management advised the SEN proposals are set against the HNB and not core funding but would still have the issue of not making savings.</p>
<p><u>Level 2 - 15/02/18</u></p> <p>Unison asked for information on what parts of the service were statutory and what weren't.</p>	<p>Management to action.</p>
<p>Unison requested information on Sharepoint was checked as some JP's do not match with the structures (SEND Places Planning, Attendance Lead, and</p>	<p>Management to action.</p>

<p>Practice Lead) and some missing JP's (e.g. Early Education Funding Team).</p>	
<p><u>Joint Level 3 – 15.2.18</u></p> <p>Unions rose that there had been no Q&A circulated in relation to SEND and that it had been approx. 5 weeks.</p>	<p>Management to action.</p> <p>MA advised that he was awaiting Legal sign off before circulating the Q&A document and hoped to have it sent out by Monday of next week.</p>
<p>Unison informed Management that the sessions which had been advertised by Workforce Development were reaching capacity and therefore staff were unable to book onto the sessions, in particular, session on stress support.</p>	<p>Management to notify Workforce Development and ensure that staff are able to book on sessions or that further sessions are arranged. MA to speak to Tina Lafferty.</p> <p>Staff are advised to notify Line Managers of any issues that they are facing or they can contact Mark Anslow/Maureen Braden directly.</p> <p>MA also re-iterated that if there are any particular staff who are particularly affected by the changes; the open offer to meet with Jenny St Romaine still remains and staff can contact Jenny directly for an appointment.</p>
<p>Unison asked where on the structure the Assistant Head of Service post is which is outlined in the Sensory Service Business Manager job profile.</p>	<p>Management to check and advise accordingly.</p>
<p>Can a current full time member of staff be assimilated into a part time post?</p>	<p>Management advised that each post/case would be looked at on an individual basis.</p>
<p>TB mentioned that a letter had been issued by Kath Tunstall on 09 February 2012 in relation to reduced pension costs for Centrally Employed Teachers.</p>	<p>Management will source a copy of the letter and update accordingly.</p>
<p>Unison requested information on Sharepoint was checked as some JP's do</p>	<p>Management to action</p>

<p>not match with the structures (SEND Places Planning, Attendance Lead, and Practice Lead) and some missing JP's (e.g. Early Education Funding Team).</p>	
<p>Unison asked what functions would be undertaken by the SEND, Place Planning, Post 16, Project role.</p>	<p>The role will mainly focus on the specialist and sufficiency of places.</p>
<p>Unison raised a concern regarding a post currently within SEN which is not showing on any of the structures.</p>	<p>JH to raise with JK directly in 1:1 meeting next week</p>
<p><u>Joint Level 3 – 23.2.18</u> No further TU questions.</p>	<p>Public consultation is open until 28 February 2018 and an up to date FAQ document is being worked on.</p> <p>PeopleToo will be working on a summary report and this will be shared in due course.</p> <p>MA/MB advised that more courses will be added to Evolve for staff to attend.</p>
<p>JH mentioned the letter which was referred to at the last meeting in respect of Teachers access to pensions – JH will send a copy of the letter to Julie Cowell.</p>	<p>Management to discuss and advise</p>

Report of the Strategic Director of Children's Services to the meeting of Executive Committee to be held on 3rd April 2018.

Subject:

BK

Ensuring the Sufficiency of Specialist places for Children and Young People with Special Educational Needs and Disabilities (SEND) across the District

Summary statement:

The Local Authority has a statutory duty to keep under review the specialist provision it makes for children and young people with special educational needs and disabilities (SEND). Whilst also ensuring there are sufficient specialist places available to meet the needs of the growing SEND population.

Under Part 1 of Bradford's SEND Review that commenced in July 2016: 'Ensuring the sufficiency of specialist places in the Bradford District for children and young people with SEND – current and future need 2016-2020' schools and academies, in partnership with the Local Authority, mapped current provision across the District and identified a need for additional specialist places. The School Forum agreed to fund the additional places from the High Needs Block and commissioned an additional 400 specialist places across SEND and Behaviour.

Bradford's long term plan is to deliver 300 of these additional places through the opening of 2 new Generic SEND Free Schools and for the remaining places to be provided in Designated Specialist Provisions across the District.

However the Local Authority can no longer open new maintained schools, therefore the only way additional places can be created is via the below routes:

- Maintained schools can seek approval from Executive to increase specialist places by way of expansion
- Maintained schools converting to an academy and increasing their published admission number at the point of conversion with approval from the Department for Education (DfE)
- Academies are able to increase specialist places by expanding with the approval of the Department for Education (DfE)

As there is no clarification from the DfE on the funding of the Generic SEND Free Schools, the Local Authority has no alternative but to move forward with the proposed transient delivery plan. This will ensure the needs of children and young

people can be met until such a point that the DfE approves the two Generic SEND Free Schools. The first two tranches of development can be seen in the proposals outlined within this report and further work is being carried out to address the remaining shortfall of specialist places.

Please note that the Capital works required to deliver all of the proposed additional places outlined in this report will be funded through an agreed amount from the Local Authority's Basic Need Allocation.

In addition Bradford was successful in its bid to establish a 72 place LA commissioned Social Emotional and Mental Health (SEMH) Free School through the Free School Programme.

This report asks the Executive to approve:

The outlined short term special school proposals

- **116 Additional proposed maintained special school places**

The outlined permanent Designated Specialist Provision (DSP) proposals

- **54 Additional proposed Designated Specialist Provision (DSP) places in maintained schools**

The outlined permanent Early Years Enhanced Specialist Provision (EYESP) proposals

- **28 Additional proposed 0.6 Early Years Enhanced Specialist Provision (EYESP) places**

Michael Jameson
Strategic Director of Children's
Services

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Portfolio:

Education Employment and Skills

Overview & Scrutiny Area:

Children's Services

1. SUMMARY

1.1 This report asks the Executive to approve the following proposals:

116 Additional proposed maintained special school places

- Chellow Heights Special School – proposal to increase the number of places for pupils by 48 additional places from 200 to 248
- Beechcliffe Special School – proposal to increase the number of places for pupils by 30 additional places from 114 to 144
- Delius Special School – proposal to increase the number of places for pupils by 24 additional places from 124 to 148
- Oastlers School – proposal to increase the number of places for pupils by 14 additional places from 80 to 94

54 Additional proposed Designated Specialist Provision (DSP) places in maintained schools

- Proposal to establish DSP for pupils with communication and interaction needs including autistic spectrum disorders (ASD) at: Crossley Hall Primary School – 12 places
- Proposal to increase DSP for pupils with communication and interaction needs including autistic spectrum conditions (ASD) at: Crossflatts Primary School from 12 places to 16 places
- Proposal to increase DSP for pupils with communication and interaction needs including autistic spectrum conditions (ASD) at: Holy Family Catholic School from 12 places to 16 places
- Proposal to increase DSP for pupils with cognition and learning needs at: Titus Salt School from 16 places to 30 places
- Proposal to establish DSP for pupils with social emotional and mental health needs (SEMH) at: Long Lee Primary School – 10 places
- Proposal to establish DSP for pupils with social emotional and mental health needs (SEMH) at: Cottingley Village Primary School – 10 places

28 Additional proposed 0.6 Early Years Enhanced Specialist Provision (EYESP) places

The proposals set out below to increase provision across the District, by creating an additional 28 x 0.6 Early Years Enhanced Specialist Provision (EYESP) places for children aged 2 – 5 years but with capacity for some children aged 5+ where appropriate with a range of special educational needs and disabilities

- Strong Close Nursery School – Proposal to increase the number of EYESP places by an additional 7 x 0.6 part time places taking the current number of places from 23 x 0.6 to 30 x 0.6 places
- St. Edmunds Nursery School – Proposal to increase the number of EYESP places by an additional 7 x 0.6 part time places taking the current number of places from 26 x 0.6 to 33 x 0.6 places
- Canterbury Nursery School – Proposal to increase the number of EYESP places by an additional 7 x 0.6 part time places taking the current number of places from 21 x 0.6 to 28 x 0.6 places
- Abbey Green Nursery School – Proposal to formally establish EYESP at the school with up to 20 x 0.6 part time places
(This is a proposal to formally establish the EYESP at Abbey Green Nursery School. The Nursery School does not currently provide enhanced SEND provision. Under the proposal the nursery will establish EYESP provision for 20 children; 13 x 0.6 EYESP places, funded from the under occupancy of other Children’s Centre Plus settings and a further 7 x 0.6 (part time) places making the EYESP at the school a 20 x 0.6 (part time) places provision)

1.2 Please note:

- 74 additional places are proposed across the Academy Special Schools
- 23 additional DSP places are proposed across 2 Academy Primary Schools
- 40 additional PRU places (34 in Ellar Carr PRU and 6 in Park Primary PRU, which is within 10% of their designated number)
- 20 additional behaviour places have been commissioned on an interim basis

1.3 All of the above proposals including the academies proposals will deliver in total 267 additional specialist places in special schools and mainstream schools. Including the specialist behaviour places (60) this will total 327 additional places out of the agreed 360 + 40 commissioned places agreed by School Forum. These proposals will be delivered over a three year period.

1.4 This currently leaves a need for a further 73 additional places + 20 further commissioned places. A plan/proposal is currently being worked through.

2. BACKGROUND

2.1.1 The Bradford District has experienced a significant increase in demand for Special Educational Needs and Disabilities (SEND) provision in the last 10 years.

2.1.2 It is projected that the demand for SEND provision will continue to grow and that in the next 3 years a minimum of 400 additional specialist places across all sectors in the Bradford District will be required. The School Forum agreed to commission the additional places.

- There is an urgent need for more specialist places in Bradford due to the increase in population
- Currently only 1% of Bradford's Special Educational Needs and Disabilities pupils are in special schools and there is a growing need for more specialist places to meet need and demand
- All children are to be valued equally, regardless of their ability, behaviour, family circumstances, ethnic origin, gender and sexual orientation
- All children are to be provided with the best learning opportunities, environment and experience which maximises their learning
- All children are entitled to a broad, balanced and relevant curriculum which is differentiated to meet individual needs
- Children's diverse special educational needs and disabilities require a range of flexible and varied provision

2.1.3 These proposals will expand and develop further specialist provision to enhance the network of Special Schools, EYESP's, DSP's and PRU's which form part of:

- A coherent geographical spread of provision across the District, minimising travel times
- A dynamic network for sharing best practice and experience
- Flexible and responsive provision to best meet the needs of Children and Young People with SEND

2.1.4 Children and Young People with a range of Special Educational Needs and Disabilities will continue to be well served in Bradford. The council is looking at the best way to offer a full range of provision locally for all children. We believe that a flexible district wide model will be able to respond effectively to local changes in demand.

2.1.5 The proposed changes will ensure the continued delivery of high quality and cost effective provision for the children and Young People of Bradford. The Council intend to have a District wide structure of EYESP's, DSP's and PRU's that will:

- Provide local EYESP's, DSP's and PRU's, reducing the need for pupils to travel long distances across the District

- Provide an equitable distribution of EYESP's, DSP's and PRU's for children and young people with special educational needs and disabilities
- Provide increased access to the curriculum; both social and academic will be increased due to the staffing experience and capacity of the new EYESP's, DSP's and PRU's. It will be possible to individually differentiate and support the work and potential of each individual pupil
- Provide an increased level of available support to all pupils and will give the greatest opportunity to increase inclusion for EYESP, DSP and PRU pupils who are otherwise very vulnerable
- Provide an improved support network, especially related to training that will support and develop the proposals
- Extend and target multi-agency support into the new EYESP's, DSP's and PRU's especially from the health authority and more specifically speech and language therapy.
- Provide a progression pathway from Primary phase to Secondary phase.
- Create additional Early Years Enhanced Specialist places and develop further specialist provision to enhance the network of high quality Nursery Schools

2.1.6 Central to these proposals is the continuity of provision between early years, primary and secondary phases of education.

2.2 Special School Provision

2.2.1 Currently the Local Authority maintains four special schools, one for secondary pupils with social, emotional and mental health (SEMH) difficulties and three generic special schools, two primaries and one secondary who manage the varying needs of children who require a protected environment in a specially resourced school in order to make progress.

2.2.2 In addition, there are four Special School Academies, one for all-age pupils with communication and interaction (C&I) needs which may include Autistic Spectrum conditions (ASC) and three generic special schools, two secondary and one primary who manage the varying needs of children who require a protected environment in a specially resourced school in order to make progress.

2.2.3 The special schools broadly cover 3 areas of the District and manage the varying needs of children who require a protected environment in a specially resourced school in order to make progress.

Table showing current Special School Provision

School	Area of Need	Registered Places	Maintained school or Academy	Phase
Chellow Heights	Generic	165	Maintained	Primary
Delius	Generic	110	Maintained	Primary
Beechcliffe	Generic	100	Maintained	Secondary
Oastlers	SEMH	80	Maintained	Secondary
Beckfoot Phoenix	Generic	80	Academy	Primary
Hazelbeck	Generic	120	Academy	Secondary
Southfield	Generic	265*	Academy	Secondary
High Park	C&I	95	Academy	All age

*Includes 12 EDSP places

Generic = A wide range of learning needs and complex health needs

SEMH = Social emotional and mental health needs

C&I = Communication and Interaction needs including autism

2.3 Designated Specialist Provision

Currently the Local Authority maintains six designated specialist provisions three for primary aged pupils and three for secondary aged pupils. In addition there are four primary and eight secondary academies who also host designated specialist provisions.

Table showing current Designated Specialist Provision

School	Area of Need	Registered Places	Maintained school or Academy	Phase
Crossflatts	ASD	12	Maintained	Primary
Denholme	ASD	8	Academy	Primary
Haworth	ASD	12	Academy	Primary
Carrwood	ASD	12	Maintained	Primary
Bradford Academy	ASD	12	Academy	Secondary
Parkside	ASD	12	Maintained	Secondary
Holy Family	ASD	12	Maintained	Secondary
Southfield Grange	ASD	12	Academy	Secondary
Grange Technology	ASD	12	Academy	Secondary

Titus Salt Beckfoot Thornton Bradford Forster Academy	LD LD LD	15 15 15	Maintained Academy Academy	Secondary Secondary Secondary
Green Lane High Craggs Oasis Lister Park	SLCN SLCN SLCN	9 6 4	Academy Academy Academy	Primary Primary Secondary
Beckfoot Bradford Academy	PD PD	10 15	Academy Academy	Secondary Secondary
Learn & Play – High Park Special School	C&I /ASD	16	Academy	Early Years

ASD = Autism

LD = Learning Difficulties

SLCN = Speech Language and Communication Needs

C& I / ASD = Communication and Interaction needs including Autism

PD = Physical Difficulties

2.4 Pupil Referral Unit Provision

There are currently 4 Pupil referral Units for children and young people with Social Emotional and Mental Health Needs (SEMH), one for primary aged pupils and three for secondary aged pupils.

Table showing current Designated Specialist Provision

School	Area of Need	Registered Places	Maintained school or Academy	Phase
Park Primary PRU	SEMH	50	Maintained	Primary
Ellar Carr	SEMH	36	Maintained	Secondary
District PRU	SEMH	160	Maintained	Secondary
Central PRU	SEMH	50	Maintained	Secondary

SEMH = Social Emotional and Mental Health

2.5 Early Years Enhanced Specialist Provision

Currently the Local Authority maintains three Nursery Schools across the District which deliver integrated early years enhanced specialist provision for Children primarily aged 2 - 5 years alongside mainstream Nursery Schools places as part of the Children's Centre plus provision.

The children that access these provisions have an Education Health and Care Plan or are undergoing assessment for an Education Health and Care Plan.

The current maintained Nursery Schools with Early Years Enhanced Specialist Provision are:

- Strong Close Nursery School (BD21)
- St. Edmunds Nursery School (BD8)
- Canterbury Nursery School (BD5)

Table showing current Provision for Children primarily aged 2 – 5 years old
(Children aged 5 years+ would be by exception)

Name of Provision	Registered Places 3-5 years (No. of FTE places)	Registered Places 0-2 years (No. of FTE places)	Current Occupancy (No. of children)
Strong Close Nursery School	12	8	18
St Edmunds Nursery School	12	8	19
Canterbury Nursery School	12	8	15
Hirstwood Nursery School	12	8	0
Barkerend CC+	12	4	4
Woodroyd CC+	12	4	3

In addition the Local Authority maintains two generic Primary Special Schools that provide Early Years Enhanced Specialist Provision and manage the varying needs of children who require a protected environment in a specially resourced school in order to make progress.

Maintained Special Schools:

- Chellow Heights Special School
- Delius Special School

Furthermore, there are two Special School Academies, one for all-age pupils with communication and interaction (C&I) needs which may include Autistic Spectrum conditions (ASC) and one generic primary special school.

Academy Special Schools:

- Beckfoot Phoenix School
- High Park School

3. OTHER CONSIDERATIONS

3.1.1 The proposed establishment of a provision that is recognised by the Local Authority as reserved for children with SEN at a maintained school requires the Local Authority to publish formal Statutory Notices.

- 3.1.2 To increase the number of pupils by 10% or 20 pupils whichever is the lesser at a special school maintained by the Local Authority requires the Local Authority to publish formal statutory proposals.
- 3.1.3 Whenever the Local Authority and Academies propose to increase places or make changes to maintained special schools, all interested parties who are likely to be affected by the proposals must be consulted in the development of the proposals. Although there is no longer a statutory pre-publication consultation period there is a strong expectation that interested parties who are likely to be affected by the Council's proposals will be consulted in developing their proposals prior to publication of statutory notices in accordance with the DfE statutory guidance.
- 3.1.4 It is important that the proposals are the subject of broad consultation with all interested parties to ensure that your views are considered and that you are fully informed and involved before a final recommendation is made.
- 3.1.5 The responses to this consultation for maintained schools must be fully analysed and considered before the Local Authority decides to publish statutory proposals in the local newspapers. The decision to approve the proposals to increase the number of places across the districts maintained special schools, EYESPs and DSPs rests with the Council's Executive.
- 3.1.6 In the case of academies, the academy trusts will be required to submit a full business case to the Department for Education (DfE) outlining their proposed changes. The academy trusts will be required to confirm as part of their business case that a fair and open local consultation has taken place. In these particular cases with proposals to increase specialist places the Local Authority is agreeable to the expansion and would argue that without the proposed change it would have a detrimental impact on local SEN provision because there would be insufficient places to meet need.
- 3.1.7 The Local Authority has continued to work closely with the academies and has carried out the academy school's consultations on behalf of the academy trusts alongside the consultation process for maintained schools. However the final decision on the academies' proposals rests with the DfE and the Regional Schools Commissioner.
- 3.1.8 The responses to the consultation had to be considered before deciding whether to publish statutory proposals necessary to proceed to implement the proposals. A full list of consultees is given in Appendix B.
- 3.1.9 In addition, when proposing changes to existing SEND provision the Council and Academies have to meet the SEN Improvement Test and be able to demonstrate that the proposed arrangements are likely to lead to improvement in the standard, quality and/or range of educational provision for children with special educational needs and disabilities. The SEN Improvement Tests are set out in Appendix V and W.

3.2 Consultation Outcomes

- 3.2.1 Following approval from the Strategic Director of Children's Services to consult on the proposals, a consultation process for both maintained school and academies commenced on 16th November 2017 and closed on 14th December 2017. The consultation outcome report, including all the responses received is provided in Appendix A.
- 3.2.2 All interested parties were invited by letter/email to respond to the consultation. The letters/emails explained the proposals, where the consultation documentation could be found online, or details of receiving a paper copy, how interested parties could make a response and finally details of scheduled public consultation meetings. A full list of all interested parties consulted with is provided within Appendix B. A sample consultation letter can be found in Appendix C.
- 3.2.3 The consultation documents were all made available on Bradford's Local Offer Website, Bradford Schools Online and the Bradford Council Website. All of the websites invited all interested parties to respond to the consultation. The individual consultation documents relating to each phase can be found in:
- Appendix D – Special School Consultation Document
 - Appendix E – DSP/PRU Consultation Document
 - Appendix F – EYESP Consultation Document
- 3.2.4 All of the Websites had the option to respond to the consultation either via an electronic survey, letter or email.
- 3.2.5 All of the responses received came through the online survey or email address. No paper letters were received.
- 3.2.6 The written comments received, acknowledged the need to provide additional specialist provision in the District to meet the needs of a growing population but there was a clear request to the Local Authority that they give consideration to the development of provision in the Ilkley/Burley/Wharfedale area of the District.
- 3.2.7 On further analysis of the Ilkley/Burley/Wharfedale area of the District, it is recognised that there is a growing need for local provision within the area to ensure children and young people can access specialist places without the need to travel long distances. The Local Authority has started to have some tentative discussions with schools within this part of the district and will look to commence a separate consultation process in the near future to consider the proposals for enhanced specialist provision in Ilkley/Burley/Wharfedale area of the District. This will be subject to Capital funds being available.
- 3.2.8 Responses from health professionals asked that specialist staff are increased alongside the development of new provision. This will be looked at as part of a joint commissioning process with Education, Health and Social Care.

3.2.9 3 Consultation meetings were held on the below dates, at the below venues:

- Monday 27th November 7pm - 8pm at Central Hall Keighley – Alice Street, Keighley, BD21 3JD
- Tuesday 5th December 7pm – 8pm at Margret McMillan Tower – Princes Way, Bradford, BD1 1NN
- Tuesday 12th December 7pm - 8pm at Queensbury Victoria Hall – Children’s Centre, Station Road, Queensbury, BD13 1AB

3.2.10 The first public consultation meeting held in Keighley was attended by two parents and one voluntary organisation member. The proposals were supported in principle acknowledging that it was good to have local provision available for children and young people with special educational needs. Some questions were raised during the meeting; these related to the individual special school offers if the proposals to increase numbers were approved.

3.2.11 The second public consultation meeting held in Margaret McMillan Tower was attended by one parent. The proposals were supported in principle acknowledging that it was good to have local provision available for children and young people with special educational needs. Some questions were raised during the meeting. These related to the specific impact of children’s education, within one special school, following the proposed increase in places.

3.2.12 The third public consultation meeting held in Queensbury was attended by one parent. The proposals were supported in principle. Some questions were raised during the meeting. These related to the specific impact on their individual child, following the proposed increase in places.

3.2.13 Four individual telephone conversations have taken place with a number of parents, raising concerns about lack of provision in the Wharfe Valley area of the district. It is acknowledged that there is a need to develop DSP provision to manage an increasing population with a clear request to the Local Authority to give consideration to the development of new provision in the Ilkley/Burley/Wharfedale area of the District.

3.2.14 All of the proposals are fully supported by the all Headteachers and Governing Bodies at the proposed schools/PRU. (This includes both maintained and academy schools).

3.3 Publication of Statutory Proposals and Representations

3.3.1 Following approval from the Strategic Director of Children’s Services Statutory Proposals were published on 25th January 2018 for each school setting as set out in 1.1:

See Appendix G, H , I and J for Special School Proposals

See Appendix K, L, M, N, O and P for DSP Proposals

See Appendix Q, R, S and T for EYESP Proposals

- 3.3.2 The Representation Period for the proposals ended on 22nd February 2018. During this period any person or organisation could submit comments on and objections to the proposals to the Local Authority to be taken into account by the decision maker.
- 3.3.3 Eight separate responses to the statutory proposals were received. Full details of all the representation responses and analysis of these responses can be found in Appendix U.

4. FINANCIAL & RESOURCE APPRAISAL

4.1 Capital Costs

- 4.1.1 The Local Authority has identified £4 million pounds from the Basic Needs Allocation to pay for the proposed additional accommodation that is required.
- 4.1.2 It is proposed a phased approach be adopted as if the proposals are approved there would be a dependency on further capital funds being secured, to successfully deliver the proposed building programme.

4.2 Revenue Costs

- 4.2.1 All of the proposed additional places across all provisions would be funded in accordance with the local determined funding formula for special educational needs pupils. Core funding will be delegated to the schools for an agreed number of places. Additional funding would be paid in accordance with individual pupil needs. The revenue funding for all of the additional places is included in the High Needs Block (HNB) allocation determined by the Schools Forum. The Local Authority would continue to maintain a service level agreement with each of the schools who host the proposed EYESP or DSP.

5. RISK MANAGEMENT AND GOVERNANCE ISSUES

Individual risks associated with the development/expansion programmes would be managed as part of the overall project to deliver the sufficiency of specialist places across the District. The Governance Programme Board meets on a monthly basis.

6. LEGAL APPRAISAL

- 6.1 All Local Authorities have a statutory duty to keep under review the provision they make for pupils with special educational needs and disabilities (SEND). There is no longer a statutory pre-publication period for proposed significant changes to schools. However, statutory DfE guidance states that there is a strong expectation on schools and Local Authorities that they consult

interested parties in developing their proposals prior to publication as part of their duty to act rationally and to take into account all relevant considerations. All responses received to such consultations must be considered in deciding whether to publish the necessary statutory proposals on the basis proposed.

- 6.2 When proposing changes to existing SEND provision the Local Authority has to meet the SEN Improvement Test and be able to demonstrate that the proposed arrangements are likely to lead to improvement in the standard, quality and/or range of educational provision for children with special educational needs and disabilities. The SEN Improvement Tests are set out in Appendix V.
- 6.3 Local Authorities must follow a statutory process by publishing formal statutory proposals for proposed changes that are expected to be in place for more than two years:-
- 6.3.1 When the proposed establishment or alteration of a provision that is recognised by the Local Authority as reserved for children with SEN at a maintained school; and
- 6.3.2. To increase the number of pupils by 10% or 20 pupils whichever is the lesser at a special school maintained by the Local Authority
- 6.4 The Strategic Director of Children's Services approved the publication of statutory proposals set out in 1.1 to this Report. Statutory proposals were published on 25 January 2018 with a four week Representation Period during which period any person or organisation could submit comments on or objections to the proposals to the Council to be taken into account by the decision maker. These will be considered by the Executive in its capacity as decision-maker when it determines the proposals at the end of the Representation Period. Executive can decide to reject, approve, approve with modifications, or approve subject to certain conditions e.g. granting of planning permission.
- 6.5 The following factors need to be considered in deciding whether or not to approve Statutory Proposals. The Executive should:-
be satisfied that:
- appropriate consultation and representation period has been carried out
 - all comments and objections received must be considered by the Executive
 - consider the quality and diversity of schools in the relevant areas
 - consider the demand for new school places
 - in assessing demand consider proposal admission arrangements
 - have regard to the Public Sector Equality Duty
 - consider the impact on community cohesion
 - consider the SEN Improvement Test that the proposed arrangements are likely to lead to improvement in the standard, quality and/or range of educational provision for children with special educational needs and disabilities

- be satisfied that travel and accessibility has been properly taken in to account
- be satisfied that any land, premises or capital required to implement the proposal will be available
- consider if the schools will be able to fulfil the legal requirement that suitable outdoor space can be provided in order to enable physical education is provided to pupils in accordance with the school curriculum; and that pupils play outside. The provision may be fulfilled by access to suitable facilities off-site

7. OTHER IMPLICATIONS

- 7.0.1 The Local Authority undertook a SEND Strategic Review 2016 - 2020 to ensure the sufficiency of specialist places for children and young people with special educational needs and disabilities (SEND) and Behaviour.
- 7.0.2 All the available data shows that there will be an on-going need to provide specialist provision for early years, primary and secondary phase children and young people with a range of special educational needs and disabilities throughout the Bradford District.
- 7.0.3 All Local Authorities have a statutory duty to keep under review the provision they make for pupils with special educational needs and disabilities (SEND). This must be based on the regular review of current and future trends (pupil profiles). In monitoring these trends, data and information it has confirmed that further specialist provision is required to meet the needs of its current and future population.
- 7.0.4 The Bradford Joint Strategic Needs Assessment (JSNA) is updated on an annual basis. This identifies considerable higher prevalence of some child disability and/or complex needs in Bradford compared to the national average, particularly in the south Asian population.
- 7.0.5 The Bradford District has experienced a significant increase in demand for SEND provision in the last 10 years. It is projected that the demand for SEND provision will continue to grow and that in the next 3 years a minimum of 360 additional specialist places for primary and secondary aged children and young people in the Bradford District will be required.
- 7.0.6 In the last 10 years Bradford has invested significant resources to develop specialist provision within the District to avoid the need to place young people out of District enabling them remain part of their local school community. It is acknowledged that there are exceptional cases where this is not possible.
- 7.0.7 The Bradford District Education Organisation Plan takes into account different factors when predicting school demand including fertility and birth rates, housing growth and inward/outward migration. Analysis of the Index of Deprivation and population estimates from the Office for National Statistics are also taken into account.

- 7.0.8 Projections for changes between 2014 and 2018 anticipated that the Districts primary school population will increase by 4.9% and the Districts secondary school population will increase by 10.4%. This makes an overall increase of 7.1%
- 7.0.9 In January 2005 the population in the Districts Schools and Nurseries was 79,589. In January 2015 the population was 90,292 an increase of 13.4%. The current population is 100,495.
- 7.0.10 Current hypotheses show that an increase in SEN will be 1.5 times the increase in population e.g. a 20% increase in the population represents a 30% increase in demand for specialist provision. The overall needs of the population were predicted to be 33% severe learning difficulties (SLD) 33% profound and multiple learning difficulties (PMLD) 33% on the autism spectrum (ASD).
- 7.0.11 By 2017 the population of the special schools has changed. The number of children with moderate learning difficulties has dropped significantly. The nature and complexity of the needs of the current children has increased. The number of children on the autism spectrum with other learning difficulties has increased. There have been similar increases for children with profound and multiple learning (PMLD) and physical difficulties (PD) with additional needs.
- 7.0.12 Pupils with PMLD and PD require additional floor space because of the equipment that is required to support them.
- 7.0.13 There have been a number of influencing factors in relation to the demand for special school places in the Bradford District:
- Improvements in medical interventions which has significantly increased life expectancy for those children with life limiting conditions
 - The overall increase in the pupil population since 2005, particularly within the south Asian community and economically deprived areas.
 - An increase in the number of referrals received for statutory assessment
 - In 2013/14 the Local Authority received 350 requests for statutory assessment. In 2014/15 the Local Authority received 506 requests for statutory assessment. This represents a 47% increase. In 2015/16 the Local Authority received 666 requests for statutory assessment. Since 2013/14 this represents a 92% increase in the requests for statutory assessment. Approximately 20% of these requests resulted in a change of provision.
 - An increase in the number of in-year admissions to special schools
In 2015/16 83 children and young people required a change in provision to special school. For place projection purposes it is anticipated that this number will continue at similar levels for the next three years.

- 7.0.14 An 11 year analysis of the January PLASC data shows that overall the number of pupils with an education health and care plan and a primary need of severe learning difficulties is about the same overall. However there has been a change to where this group of children go to school. The proportion of children and young people who attend our mainstream schools has decreased significantly. The proportion of children and young people who attend our special schools has increased significantly. This is partly influenced by a growing number of children and young people who attend resourced provision as these provisions have been opened in recent years. This is relatively small in number overall. Another influence could be parental preference for specialist provision but these changes could also be linked to the capacity of our schools to meet a range of learning needs balancing the needs of all children and the pressure to improve standards alongside the level of resources that are delegated directly to schools.
- 7.0.15 The identification of autism spectrum conditions continues to increase. More clinics have been established to enable the diagnosis of ASD earlier. Support documents from the Joint Assessment Clinic show there is likely to be an increase in demand for autism provision. Health professionals inform the Local Authority of young children with additional needs. An analysis of these notifications shows that children and young people identified with speech language and communication needs are the largest cohort of notifications received. A significant number of these are likely to receive a diagnosis of autism.
- 7.0.16 The distribution of special educational needs and disabilities is widespread across the District.
- 7.0.17 The projected population increases are applied to the current known special educational needs and disabilities population. In addition, other local data such as the Joint Strategic Needs Assessment (JSNA) is considered such as the prevalence of complex health and disability in the local district. The early identification of young children and the outcome of statutory assessments have identified an increase in numbers for some areas of need.
- 7.0.18 This provides an indication of the future demand for places. By 2018 this shows that additional places will be required to support children and young people with special educational needs.
- 7.0.19 360 Generic specialist places and 40 specialist behaviour places are required over the next 3 years.
- 7.0.20 Long term, Bradford could be successful in the opening of two new specialist free schools to meet current and future need. If successful the earliest opening date for a new free school would be September 2020. As the existing special schools are currently full the Local Authority needs to provide additional places in the meantime.

7.1 EQUALITY & DIVERSITY

The Local Authority must not discriminate directly or indirectly against any group or individual. The schools and any proposed new provision will continue to cater for the needs of all children and serve its community. An Equalities impact Assessment has been carried out and can be seen in Appendix X.

7.2 SUSTAINABILITY IMPLICATIONS

There are no direct sustainability implications arising from this report. Any development or changes to buildings undertaken as a result of these proposals will be undertaken in a sustainable way which minimises the future impact of the Local Authority's carbon footprint.

7.3 GREENHOUSE GAS EMISSIONS IMPACTS

The proposals would not impact on gas emissions. If children are able to attend their local provision this could lead to a reduction in emissions.

7.4 COMMUNITY SAFETY IMPLICATIONS

These arrangements will allow the children and young people to build their skills in a specialist environment and access their own community in the safest and most independent fashion.

7.5 HUMAN RIGHTS ACT

The Human Rights Act incorporates the European Convention on Human Rights which provides that no person shall be denied the right to education.

7.6 TRADE UNION

As part of the consultation process the Trade Unions will be consulted formally about this proposal in accordance with the Council's IR Framework.

7.7 WARD IMPLICATIONS

Ward Councillors have been consulted with about the proposed changes to the schools/provision in their wards.

8. NOT FOR PUBLICATION DOCUMENTS

None.

9. OPTIONS

Considering the outcomes of both rounds of consultation (initial consultation 16th November 2017 – 14th December 2017 and Statutory Representation period 25th January 2018 to 22nd February 2018) the Executive has the following options:

9.1 116 Additional proposed maintained special school places

9.1.1 Chellow Heights Special School:

- a) Approve the proposal to increase the number of places for pupils at Chellow Heights Special School by increasing the pupil numbers from 200 to 248 with effect from 16 April 2018 onwards (subject to the proposed capital building programme and the granting of planning permission)
- b) Reject the proposal to increase the number of places for pupils at Chellow Heights Special School
- c) Approve the published proposals with modifications

9.1.2 Delius Special School:

- a) Approve the proposal to increase the number of places for pupils at Delius Special School by increasing the pupil numbers from 124 to 148 with effect from 1 September 2018 onwards (subject to the proposed capital building programme and the granting of planning permission)
- b) Reject the proposal to increase the number of places for pupils at Delius Special School
- c) Approve the published proposals with modifications

9.1.3 Beechcliffe Special School:

- a) Approve the proposal to increase the number of places for pupils at Beechcliffe Special School by increasing the pupil numbers from 114 to 144 with effect from 16 April 2018 onwards (subject to the proposed capital building programme and permissions)
- b) Reject the proposal to increase the number of places for pupils at Beechcliffe Special School
- c) Approve the published proposals with modifications

9.1.4 Oastlers School:

- a) Approve the proposal to increase the number of places for pupils at Oastlers School by increasing the pupil numbers from 80 to 94 with effect from 16 April 2018 onwards
- b) Reject the proposal to increase the number of places for pupils at Oastlers School
- c) Approve the published proposals with modifications

9.2 54 Additional DSP places in maintained schools

9.2.1 Crossley Hall Primary School:

- a) Approve the proposal to establish DSP at Crossley Hall Primary School with up to 12 places for primary aged children and young people with communication and interaction needs including autistic spectrum disorders (ASD) with effect from 1 September 2018 onwards
- b) Reject the proposal to establish DSP with up to 12 places at Crossley Hall Primary School
- c) Approve the published proposals with modifications

9.2.2 Crossflatts Primary School:

- a) Approve the proposal to increase the existing DSP at Crossflatts Primary School for primary aged children and young people with communication and interaction needs including autistic spectrum disorders (ASD) from 12 places to 16 places, with effect from 16 April 2018 onwards
- b) Reject the proposal to increase the existing DSP at Crossflatts Primary School
- c) Approve the published proposals with modifications

9.2.3 The Holy Family Catholic School:

- a) Approve the proposal to increase the existing DSP at The Holy Family Catholic School for secondary aged children and young people with communication and interaction needs including autistic spectrum disorders (ASD) from 12 places to 16 places, with effect from 16 April 2018 onwards
- b) Reject the proposal to increase the existing DSP at The Holy Family Catholic School
- c) Approve the published proposals with modifications

9.2.4 Titus Salt School:

- a) Approve the proposal to increase the existing DSP at Titus Salt School for secondary aged children and young people with cognition and learning needs from 16 places to 30 places, with effect from 16 April 2018 onwards (subject to the proposed capital building programme and the granting of planning permission)
- b) Reject the proposal to increase the existing DSP at Titus Salt School
- c) Approve the published proposals with modifications

9.2.5 Long Lee Primary School:

- a) Approve the proposal to establish DSP at Long Lee Primary School with up to 10 places for primary aged children and young people with social emotional and mental health needs (SEMH) with effect from 16 April 2018 onwards (subject to the proposed capital building programme)

- b) Reject the proposal to establish DSP with up to 10 places at Long Lee Primary School
- c) Approve the published proposals with modifications

9.2.6 Cottingley Village Primary School:

- a) Approve the proposal to establish DSP at Cottingley Village Primary School with up to 10 places for primary aged children and young people with social emotional and mental health needs (SEMH) with effect from 16 April 2018 onwards (subject to the proposed capital building programme)
- b) Reject the proposal to establish DSP with up to 10 places at Cottingley Village Primary School
- c) Approve the published proposals with modifications

9.3 28 Additional 0.6 Early Years Enhanced Specialist Provision (EYESP) places

9.3.1 Strong Close Nursery School:

- a) Approve the proposal to increase the number of EYESP places at Strong Close Nursery School for early years aged children from 23 to 30 x 0.6 part time places, with effect from 16 April 2018 onwards (subject to the proposed capital building programme and planning permission)
- b) Reject the proposal to increase the number of EYESP places at Strong Close Nursery School
- c) Approve the published proposals with modifications

9.3.2 St Edmunds Nursery School

- a) Approve the proposal to increase the number of EYESP places at St Edmunds Nursery School for early years aged children from 26 to 33 x 0.6 part time places, with effect from 16 April 2018 onwards
- b) Reject the proposal to increase the number of EYESP places at St Edmunds Nursery School
- c) Approve the published proposals with modifications

9.3.3 Canterbury Nursery School

- a) Approve the proposal to increase the number of EYESP places at Canterbury Nursery School for early years aged children from 21 to 28 x 0.6 part time places, with effect from 16 April 2018 onwards (subject to the proposed capital building programme)
- b) Reject the proposal to increase the number of EYESP places at Canterbury Nursery School
- c) Approve the published proposals with modifications

9.3.4 Abbey Green Nursery School

- a) Approve the proposal to formally establish 20 x part time 0.6 place EYESP at Abbey Green Nursery School for early years aged children with effect from 16 April 2018 onwards (subject to the proposed capital building programme)
- b) Reject the proposal to formally establish a 20 x 0.6 part time place EYESP at Abbey Green Nursery School
- c) Approve the published proposals with modifications

10. RECOMMENDATIONS

- 10.1 It is recommended that the Executive:
- 10.2 Approve the proposal to increase the number of places for pupils at Chellow Heights Special School by increasing the pupil numbers from 200 to 248 with effect from 16 April 2018 onwards (subject to the proposed capital building programme and the granting of planning permission)
- 10.3 Approve the proposal to increase the number of places for pupils at Delius Special School by increasing the pupil numbers from 124 to 148 with effect from 1 September 2018 onwards (subject to the proposed capital building programme and the granting of planning permission)
- 10.4 Approve the proposal to increase the number of places for pupils at Beechcliffe Special School by increasing the pupil numbers from 114 to 144 with effect from 16 April 2018 onwards (subject to the proposed capital building programme and permissions)
- 10.5 Approve the proposal to increase the number of places for pupils at Oastlers School by increasing the pupil numbers from 80 to 94 with effect from 16 April 2018 onwards
- 10.6 Approve the proposal to establish DSP at Crossley Hall Primary School with up to 12 places for primary aged children and young people with communication and interaction needs including autistic spectrum disorders (ASD) with effect from 1 September 2018 onwards
- 10.7 Approve the proposal to increase the existing DSP at Crossflatts Primary School for primary aged children and young people with communication and interaction needs including autistic spectrum disorders (ASD) from 12 places to 16 places, with effect from 16 April 2018 onwards
- 10.8 Approve the proposal to increase the existing DSP at The Holy Family Catholic School for secondary aged children and young people with communication and interaction needs including autistic spectrum disorders (ASD) from 12 places to 16 places, with effect from 16 April 2018 onwards

- 10.9 Approve the proposal to increase the existing DSP at Titus Salt School for secondary aged children and young people with cognition and learning needs from 16 places to 30 places, with effect from 16 April 2018 onwards (subject to the proposed capital building programme and the granting of planning permission)
- 10.10 Approve the proposal to establish DSP at Long Lee Primary School with up to 10 places for primary aged children and young people with social emotional and mental health needs (SEMH) with effect from 16 April 2018 onwards (subject to the proposed capital building programme)
- 10.11 Approve the proposal to establish DSP at Cottingley Village Primary School with up to 10 places for primary aged children and young people with social emotional and mental health needs (SEMH) with effect from 16 April 2018 onwards (subject to the proposed capital building programme)
- 10.12 Approve the proposal to increase the number of EYESP places at Strong Close Nursery School for early years aged children from 23 to 30 x 0.6 part time places, with effect from 16 April 2018 onwards (subject to the proposed capital building programme and planning permission)
- 10.13 Approve the proposal to increase the number of EYESP places at St Edmunds Nursery School for early years aged children from 26 to 33 x 0.6 part time places, with effect from 16 April 2018 onwards
- 10.14 Approve the proposal to increase the number of EYESP places at Canterbury Nursery School for early years aged children from 21 to 28 x 0.6 part time places, with effect from 16 April 2018 onwards (subject to the proposed capital building programme)
- 10.15 Approve the proposal to formally establish 20 x part time 0.6 place EYESP at Abbey Green Nursery School for early years aged children with effect from 16 April 2018 onwards (subject to the proposed capital building programme)

11. APPENDICES

- Appendix A - Consultation Outcome Report
- Appendix B - List of Consultees
- Appendix C - Sample Consultation Letter
- Appendix D - Special School Consultation Document
- Appendix E - DSP/PRU Consultation Document
- Appendix F - EYESP Consultation Document
- Appendix G - Copy of Statutory Proposal for Chellow Heights Special School
- Appendix H - Copy of Statutory Proposal for Delius Special School
- Appendix I - Copy of Statutory Proposal for Beechcliffe Special School
- Appendix J - Copy of Statutory Proposal for Oastlers School
- Appendix K - Copy of Statutory Proposal for Crossley Hall Primary School
- Appendix L - Copy of Statutory Proposal for Crossflatts Primary School

Appendix M - Copy of Statutory Proposal for The Holy Family Catholic School
Appendix N - Copy of Statutory Proposal for Titus Salt School
Appendix O - Copy of Statutory Proposal for Long Lee Primary School
Appendix P - Copy of Statutory Proposal for Cottingley Village Primary School
Appendix Q - Copy of Statutory Proposal for Strong Close Nursery School
Appendix R - Copy of Statutory Proposal for St Edmunds Nursery School
Appendix S - Copy of Statutory Proposal for Canterbury Nursery School
Appendix T - Copy of Statutory Proposal for Abbey Green Nursery School
Appendix U – Responses to Statutory Notices
Appendix V – SEN Improvement Test (Special Schools/EYESP')
Appendix W - SEN Improvement Test (DSP's/PRU)
Appendix X – Equalities Impact Assessment

12. BACKGROUND DOCUMENTS

SEND Review 2016-2020

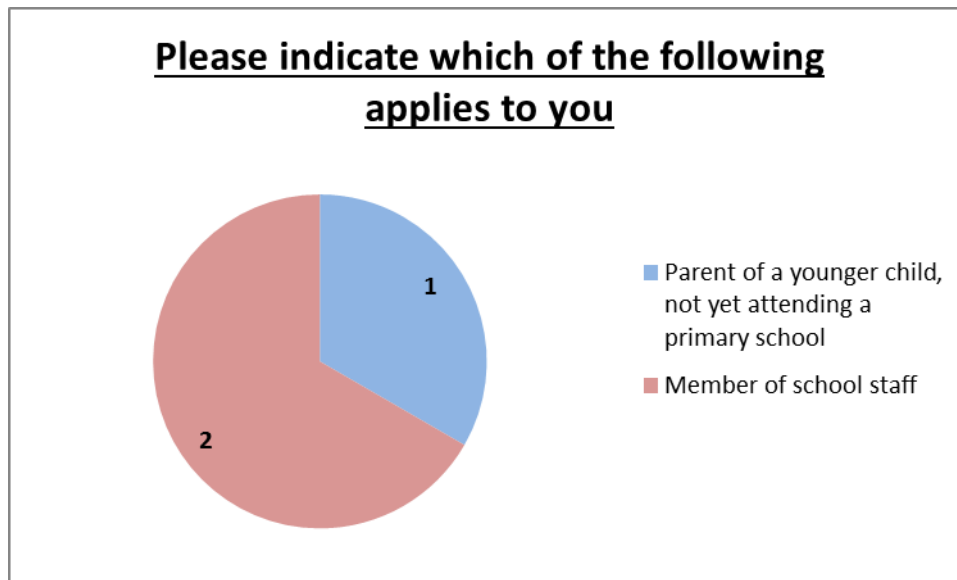
School Organisational Plan September 2017

Report to the SDCS to seek approval to consult – June 2017

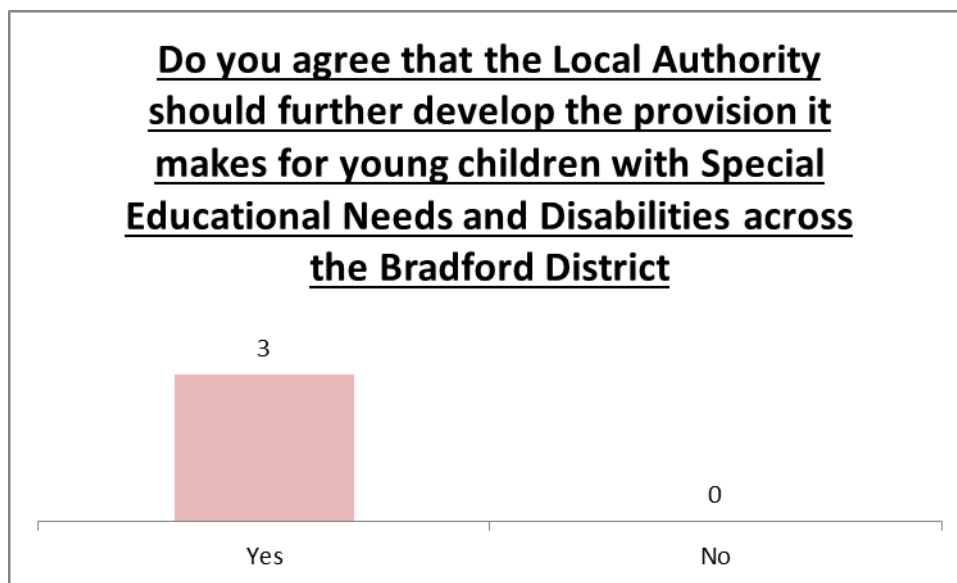
Report to the SDCS to seek approval to publish Statutory Notice – 12th January 2018

Consultation Documents for each phase (Special School, DSP/PRU and EYESP's)
published 16th November 2017

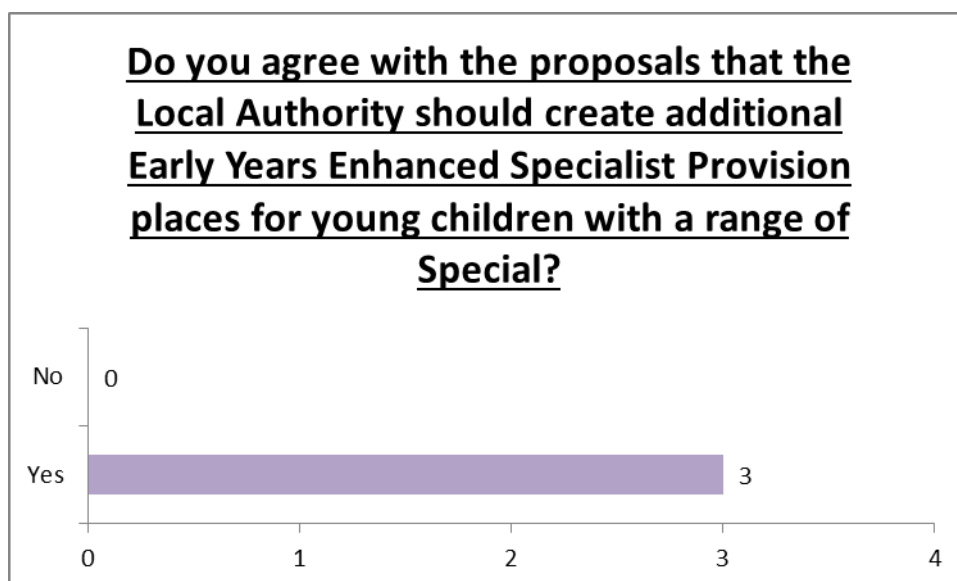
Appendix A

**Early Years Enhanced Specialist Provision (EYESP)
Consultation Questionnaire Results**

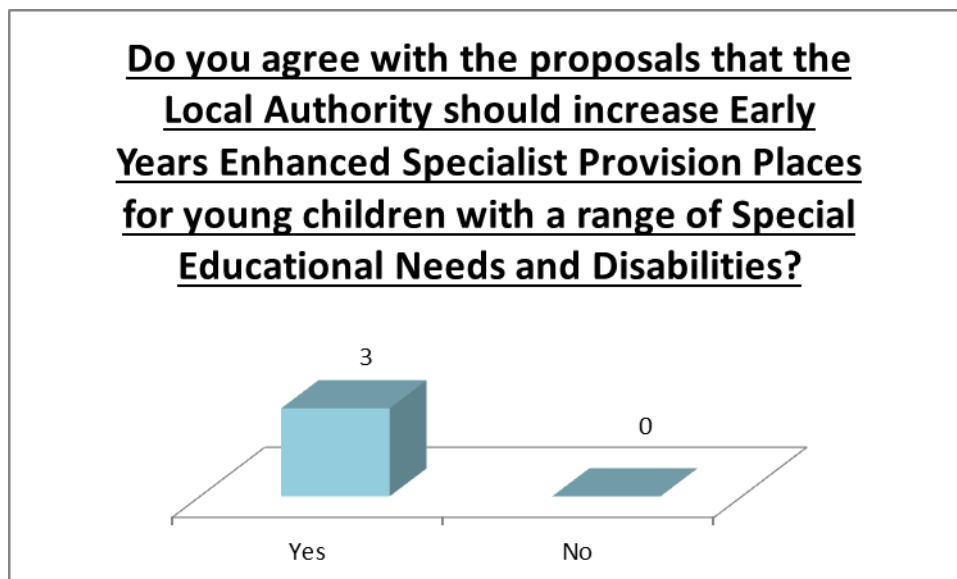
2 respondents were a Parent of a younger child not yet attending a primary school.
1 respondent was a member of school staff.



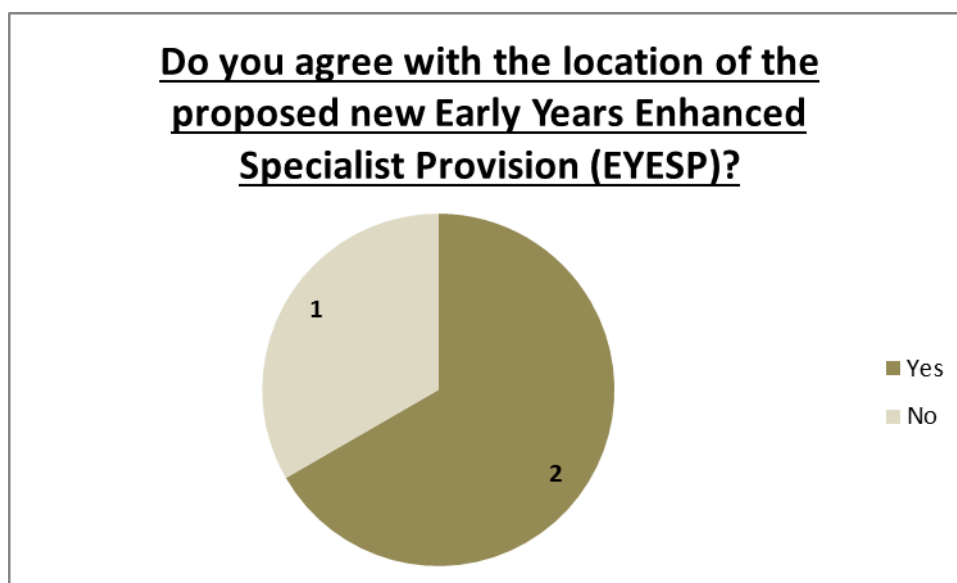
All respondents agreed that the Local Authority should further develop the provision it makes for young children with Special Educational Needs and Disabilities across the Bradford District.



All respondents agree with the proposals that the Local Authority should create additional Early Years Enhanced Specialist Provision places for young children with a range of Special Educational Needs and Disabilities.



All respondents agree with the proposals that the Local Authority should increase Early Years Enhanced Specialist Provision Places for young children with a range of Special Educational Needs and Disabilities.



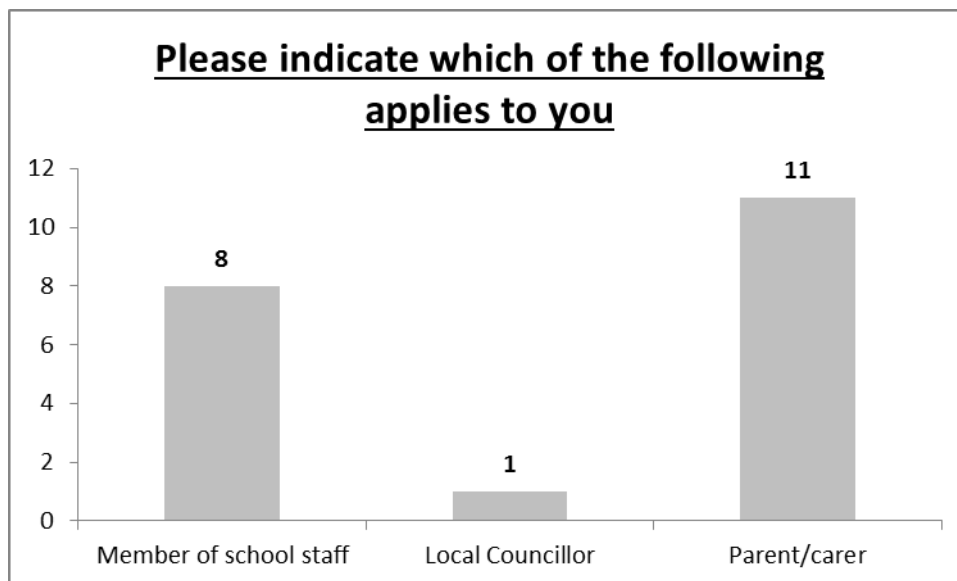
2 respondents agreed with the location of the proposed new Early Years Enhanced Specialist Provision (EYESP).

1 respondent disagreed with the location of the proposed new Early Years Enhanced Specialist Provision (EYESP). No comments were recorded by the respondent detailing why they disagreed with the proposals

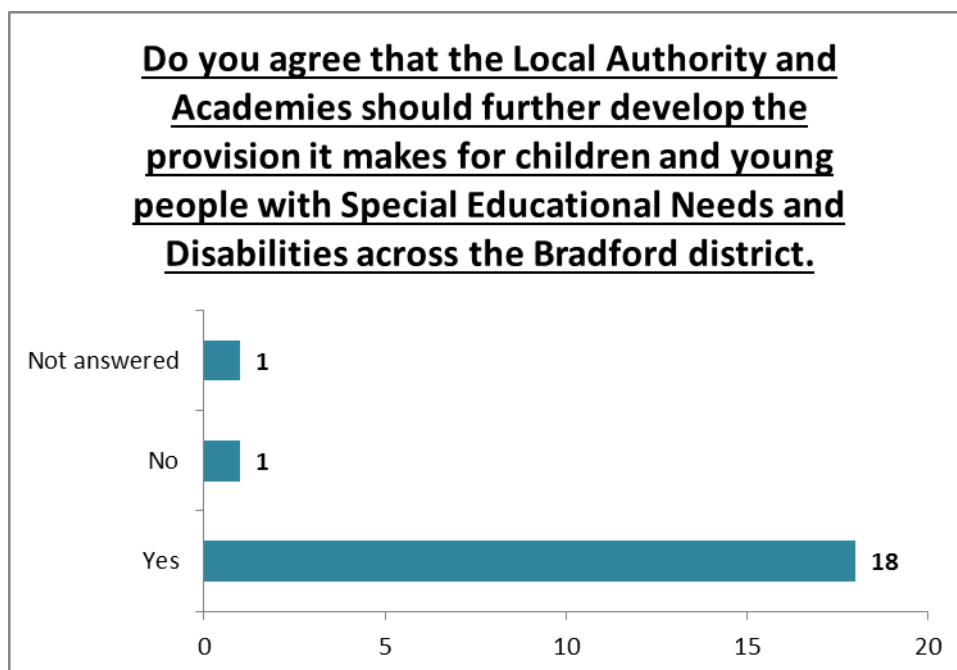
Feedback received concerning Early Years Enhanced Specialist Provision Consultation via email and consultation events

Do you want to make any additional comments or raise any other issues		
Type of respondent	Comments	Local Authorities Response
Charity, Community and Voluntary Sector	<ul style="list-style-type: none"> Hirstwood Arc is not mentioned in the consultation letter. Is this provision remaining the same with no additional places or will provision at Hirstwood cease to exist? 	The specialist places at Hirstwood Nursery School will cease due to the very limited take up over the last 3 years and a current occupancy of 0.

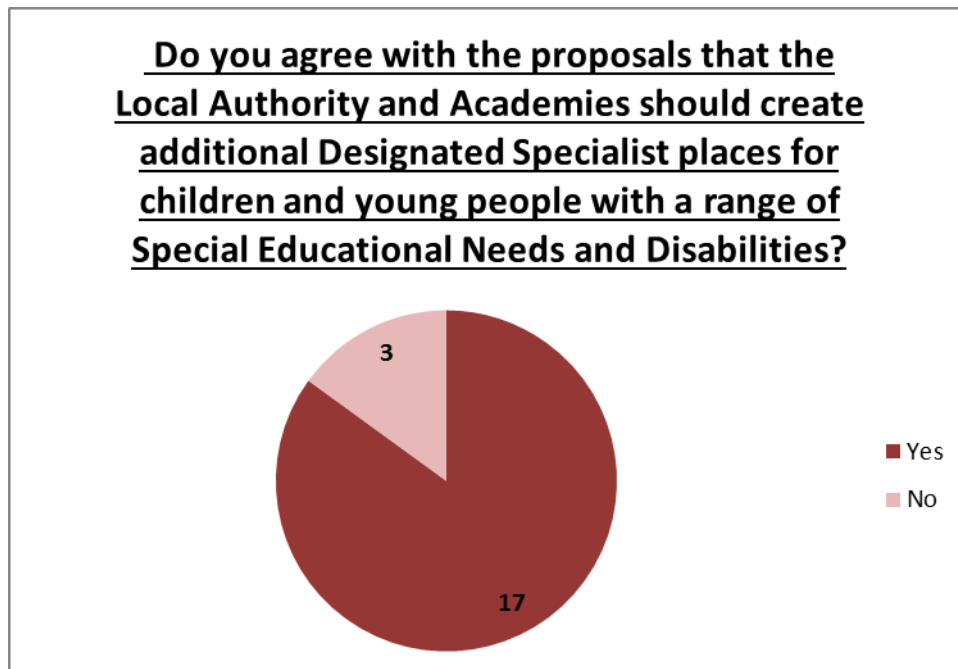
Designated Specialist Provision (DSP) and Pupil Referral Unit (PRU) Consultation Questionnaire Results



11 respondents were a Parent/Carer
 8 respondents were a member of school staff.
 1 respondent was a Local Councillor



18 respondents agreed that the Local Authority and Academies should further develop the provision it makes for children and young people with Special Educational Needs and Disabilities across the Bradford district.
 1 respondent disagreed that the Local Authority and Academies should further develop the provision it makes for children and young people with Special Educational Needs and Disabilities across the Bradford district. No comments were recorded by the respondent detailing why they disagreed with the proposals.
 1 person did not answer the question.

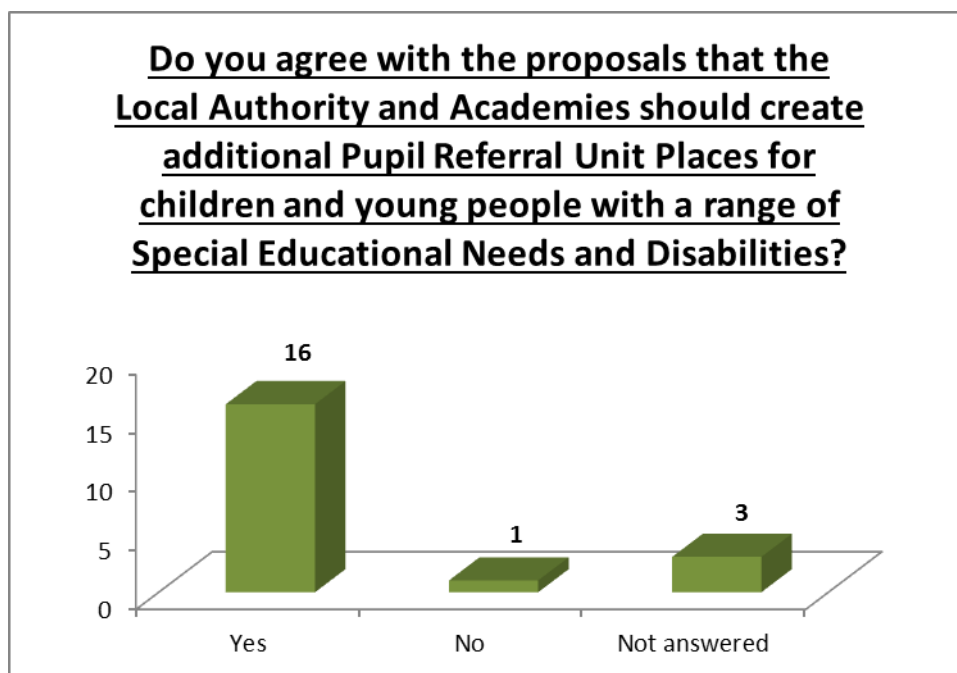


17 respondents agreed with the proposals that the Local Authority and Academies should create additional Designated Specialist places for children and young people with a range of Special Educational Needs and Disabilities.

3 respondents disagreed with the proposals that the Local Authority and Academies should create additional Designated Specialist places for children and young people with a range of Special Educational Needs and Disabilities.

1 comment was recorded by the respondent detailing why they disagreed with the proposals

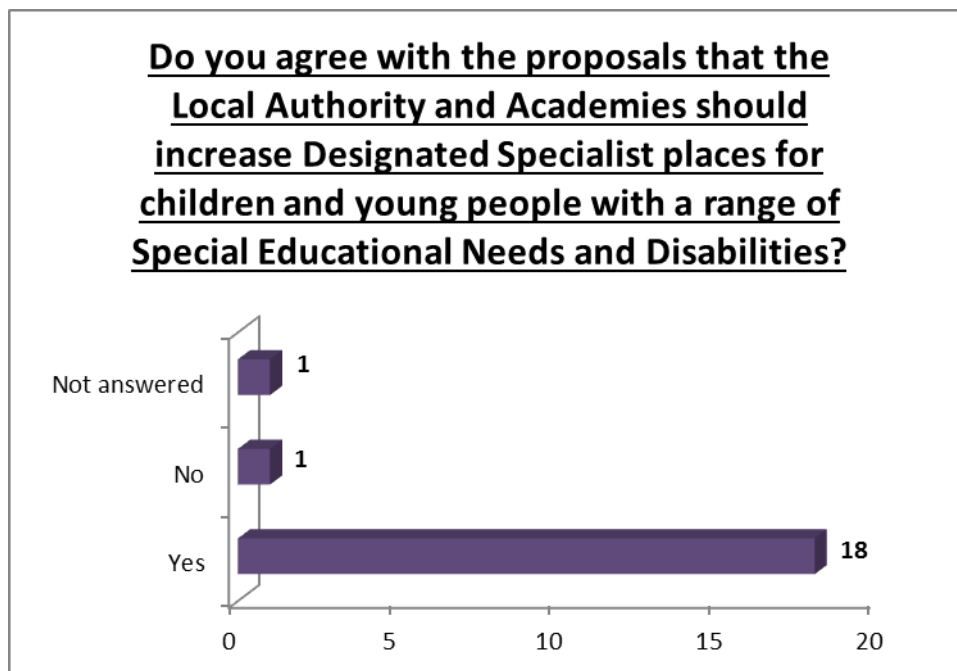
parent/carer	Build a new school instead, there is no local special school for my daughter in Ilkley
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16 respondents agreed with the proposals that the Local Authority and Academies should create additional Pupil Referral Unit Places for children and young people with a range of Special Educational Needs and Disabilities.

1 respondent disagreed with the proposals that the Local Authority and Academies should create additional Pupil Referral Unit Places for children and young people with a range of Special Educational Needs and Disabilities. No comments were recorded by the respondent detailing why they disagreed with the proposals.

3 people did not answer the question.



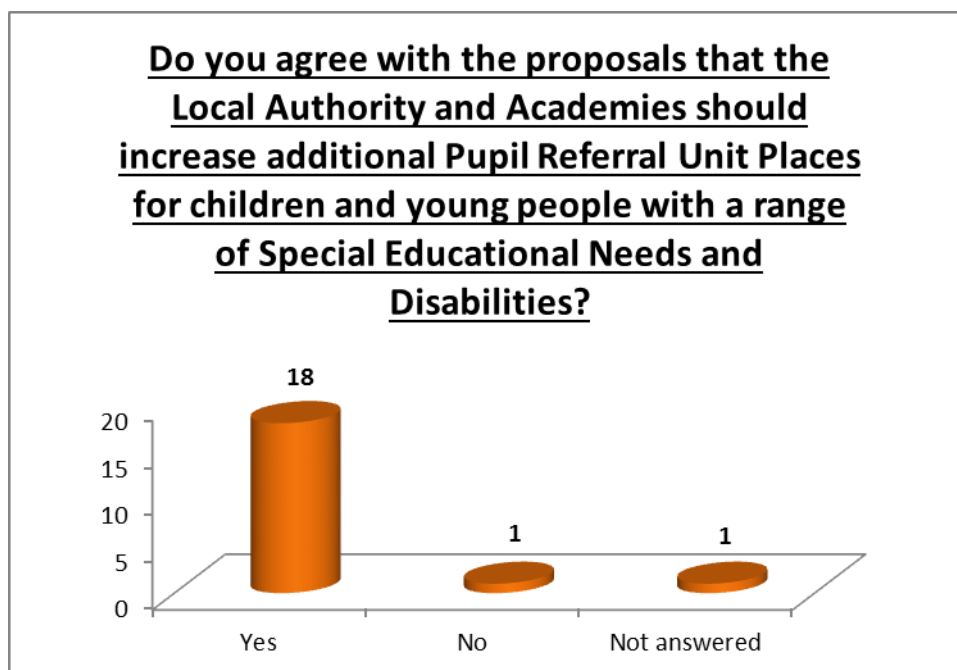
18 respondents agreed with the proposals that the Local Authority and Academies should increase Designated Specialist places for children and young people with a range of Special Educational Needs and Disabilities

1 respondent disagreed with the proposals that the Local Authority and Academies should increase Designated Specialist places for children and young people with a range of Special Educational Needs and Disabilities.

1 comment was recorded by the respondent detailing why they disagreed with the proposals

parent/carer	Help for adults with learning disabilities to continue their lifelong education must be included.
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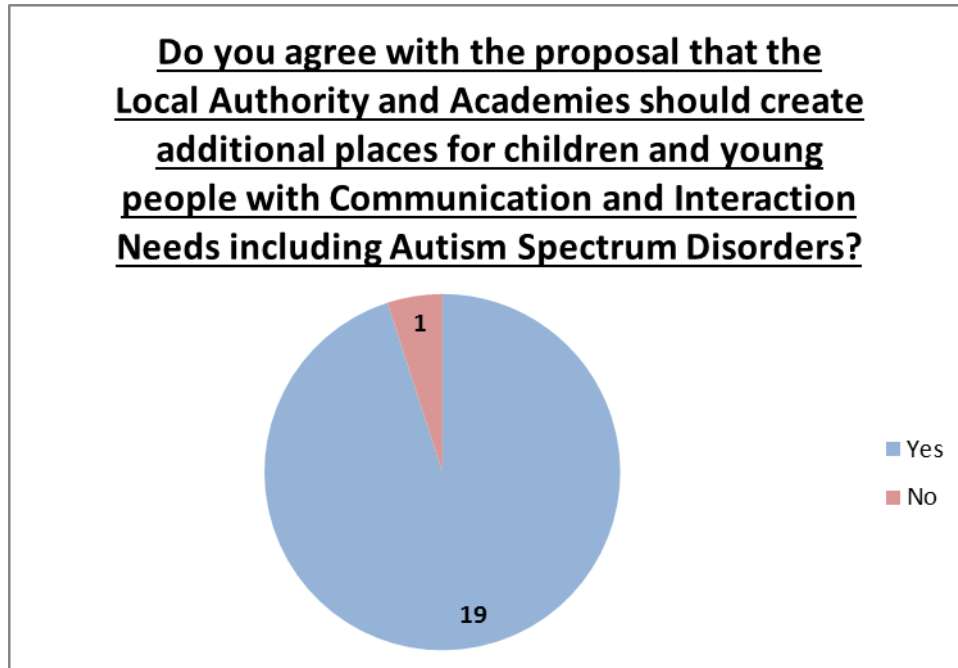
1 person did not answer the question.



18 respondents agreed with the proposals that the Local Authority and Academies should increase additional Pupil Referral Unit Places for children and young people with a range of Special Educational Needs and Disabilities.

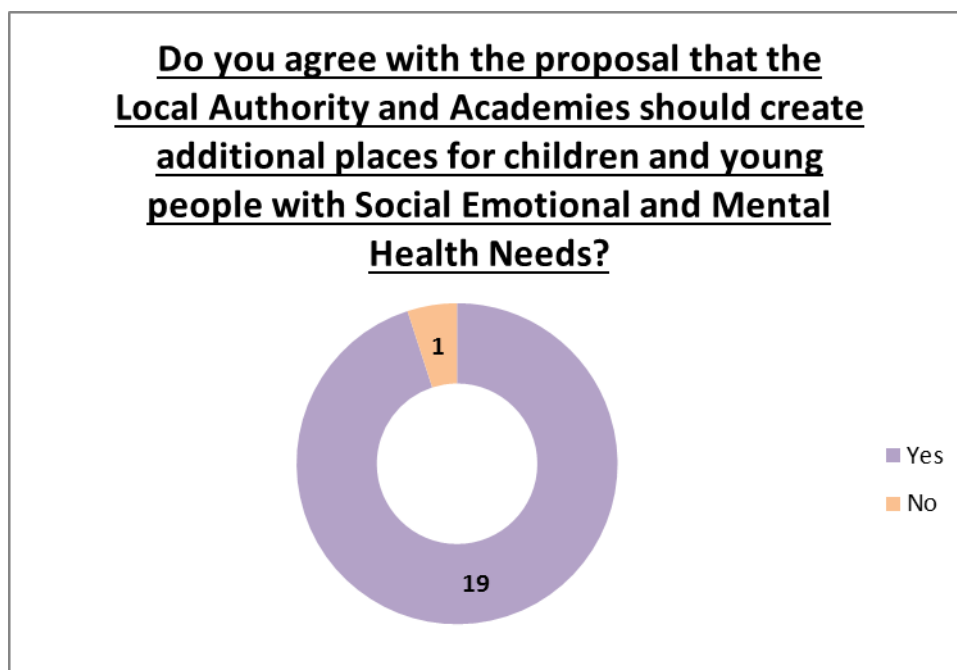
1 respondent disagreed with the proposals that the Local Authority and Academies should increase additional Pupil Referral Unit Places for children and young people with a range of Special Educational Needs and Disabilities. No comments were recorded by the respondent detailing why they disagreed with the proposals

1 person did not answer the question.



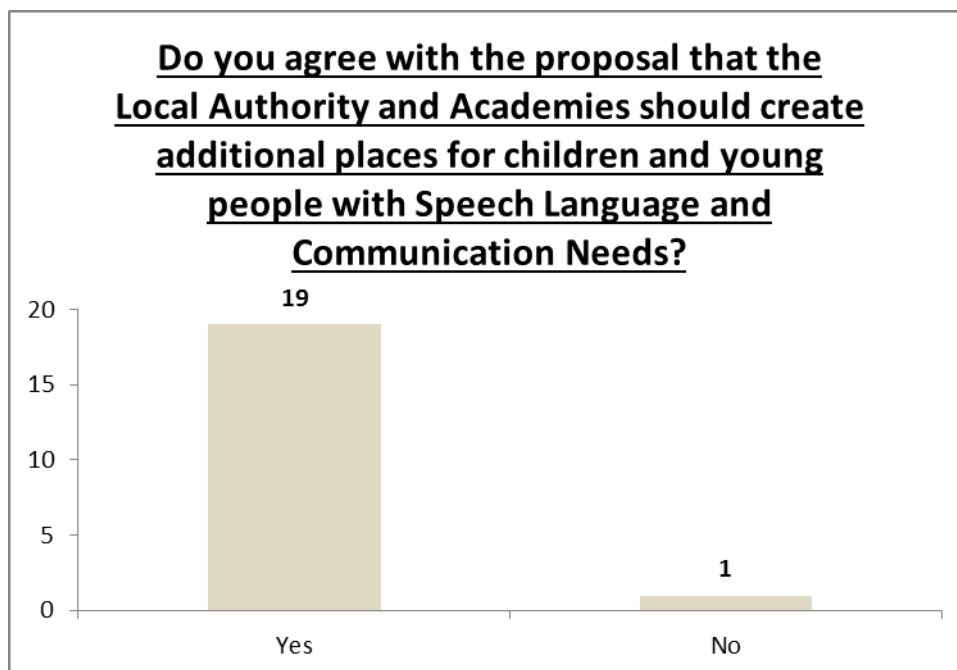
19 respondents agreed with the proposal that the Local Authority and Academies should create additional places for children and young people with Communication and Interaction Needs including Autism Spectrum Disorders.

1 respondent disagreed with the proposal that the Local Authority and Academies should create additional places for children and young people with Communication and Interaction Needs including Autism Spectrum Disorders. No comments were recorded by the respondent detailing why they disagreed with the proposals



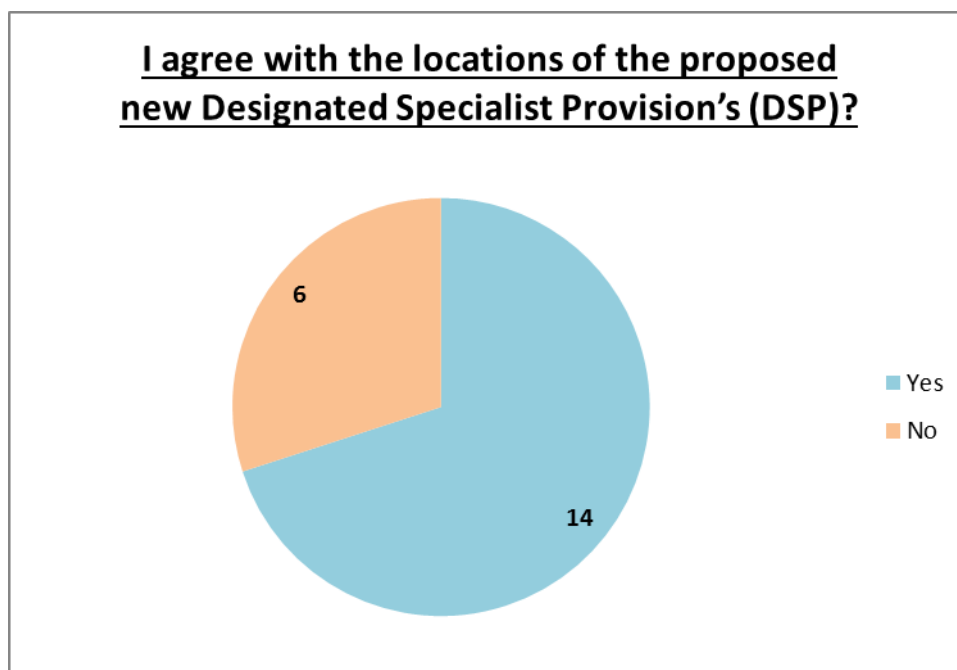
19 respondents agreed with the proposal that the Local Authority and Academies should create additional places for children and young people with Social Emotional and Mental Health Needs.

1 respondent disagreed with the proposal that the Local Authority and Academies should create additional places for children and young people with Social Emotional and Mental Health Needs. No comments were recorded by the respondent detailing why they disagreed with the proposals



19 respondents agreed with the proposal that the Local Authority and Academies should create additional places for children and young people with Speech Language and Communication Needs.

1 respondent disagreed with the proposal that the Local Authority and Academies should create additional places for children and young people with Speech Language and Communication Needs. No comments were recorded by the respondent detailing why they disagreed with the proposals.



14 respondents agreed with the locations of the proposed new Designated Specialist Provision's (DSP).

6 respondents disagreed with the locations of the proposed new Designated Specialist Provision's (DSP).

6 comments were recorded by the respondents detailing why they disagreed with the proposals

parent/carer	Worth Valley - 10 mins from Haworth. Green Lane - 15 mins from Carrwood. Still no Wharfe Valley DSP.
parent/carer	I personally think that a DSP in the Shipley area would be highly desirable!
parent/carer	Build a new school instead, there is no local special school for my daughter in Ilkley
parent/carer	There are currently no DSP's in the Wharfedale area, please consider this area for future DSP's!!
parent/carer	We need a DSP in the Wharfedale area or Ilkley or near
parent/carer	No Wharfedale valley provision at all. Esp secondary - kids want to be local with peers and community
parent/carer	Why is Bradford ignoring children in Wharfedale & Airedale again. Provision needs to be district wide.

All comments received via online questionnaire.

Do you want to make any additional comments or raise any other issues	
Type of respondent	Comments
parent/carer	Please make post 16 more of a priority. Remember Leeds/Bradford border should NOT affect the child
parent/carer	Worth Valley - 10 mins from Haworth. Green Lane - 15 mins from Carrwood. Still no Wharfe Valley DSP.
parent/carer	I personally think that a DSP in the Shipley area would be highly desirable!
parent/carer	Build a new school instead, there in no local special school for my daughter in Ilkley
parent/carer	There are currently no DSP's in the Wharfedale area, please consider this area for future DSP's!!
parent/carer	We need a DSP in the Wharfedale area or Ilkley or near
parent/carer	No Wharfedale valley provision at all. Esp secondary - kids want to be local with peers and community
parent/carer	Why is Bradford ignoring children in Wharfedale & Airedale again. Provision needs to be district wide.
member of school staff	We have offered / asked to be a dsp numerous times and have an additional provision already set up
parent/carer	Help for adults with learning disabilities to continue their lifelong education must be included.

who would benefit from a local DSP in the Ilkley area.

can no longer open new schools; however we are fully supporting two free school bids and have commissioned 300 specialist places.

If successful the earliest opening date for the new free schools would be September 2020/21.

The increase in places at Chellow Heights Special School is split across two sites.

On further analysis of the Ilkley/Burley/Wharfedale area of the District, it is recognised that there is a growing need for local provision within the area to ensure children and young people can access specialist places without the need to travel long distances. The Local Authority has started to have some tentative discussions with schools within this part of the district and will look to commence a separate consultation process in the near future to consider the proposals for enhanced specialist provision in Ilkley/Burley/Wharfedale area of the District. This will be subject to Capital funds being available.



<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 197</p>	<p>Parent/carer</p> <p>I am very concerned about the complete lack of suitable specialist provision for children with autism in Wharfedale in these proposals. It seems to me that the proposed new DSP places are very close to existing facilities and there is no reasonable geographical spread across the district. I am aware of several other families who share these concerns.</p> <p>I do not believe that the Council is fulfilling its responsibility to ensure that suitable education is available for children across the district. Many children with autism in Wharfedale would struggle to cope with the journey to these DSPs day in day out and still have the energy to manage a full day at school, learn and fulfil their potential.</p>	<p>All Local Authorities have a statutory duty to keep under review the provision they make for pupils with special educational needs and disabilities (SEND). This must be based on the regular review of current and future trends (pupil profiles). In monitoring these trends, data and information it has confirmed that further specialist provision is required to meet the needs of its current and future population. On further analysis of the Ilkley/Burley/Wharfedale area of the District, it is recognised that there is a growing need for local provision within the area to ensure children and young people can access specialist places without the need to travel long distances. The Local Authority has started to have some tentative discussions with schools within this part of the district and will look to commence a separate consultation process in the near future to consider the proposals for enhanced specialist provision in Ilkley/Burley/Wharfedale area of the District. This will be subject to Capital funds being available.</p>
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<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 198</p>	<p>Parent/carer</p> <p>I has been very disheartening when undertaking this process to learn there that there is a lack of suitable specialist provision for children with autism in the Wharfedale area. I further understand that current proposals for increasing DSP capacity relate to locations outside Wharfedale. One of my primary concerns relates to the effect of extensive travelling time on an autistic child and whether it is appropriate for such children to have to travel such large distances, given how tiring and difficult this may be for some.</p>	<p>These proposals will expand and develop further specialist provision to enhance the network of Special Schools, EYESP's, DSP's and PRU's which form part of:</p> <ul style="list-style-type: none"> • A coherent geographical spread of provision across the District, minimising travel times • A dynamic network for sharing best practice and experience • Flexible and responsive provision to best meet the needs of Children and Young People with SEND <p>Children and Young People with a range of Special Educational Needs and Disabilities will continue to be well served in Bradford. The council is looking at the best way to offer a full range of provision locally for all children. We believe that a flexible district wide model will be able to respond effectively to local changes in demand.</p> <p>On further analysis of the Ilkley/Burley/Wharfedale area of the District, it is recognised that there is a growing need for local provision within the area to ensure children and young people can access specialist places without the need to travel long distances. The Local Authority has started to have some tentative discussions with schools within this part of the district and will look to commence a separate consultation process in the near future to consider the proposals for enhanced specialist provision in Ilkley/Burley/Wharfedale area of the District. This will be subject to Capital funds being available.</p>
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<p>Parent/carer</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 199</p>	<p>I disagree with Bradford councils approach to increasing the amount of places available for send students in the Bradford area. i believe that by increasing the capacity of the currently operating schools this will increase the pressure on already struggling services and will lead to a poorer quality of education for not just the current students at the schools in question, but also the new students. the schools were designed with a maximum capacity in mind. whilst i understand that additional classrooms will be constructed in order to increase the schools capacity this will still place pressure on the schools already constructed services such as the assembly halls and sports facility's. the stretching of these current services cannot have anything but a negative effect on the students education.</p> <p>i understand that their is a need for SEND places in the Bradford area however i believe that their needs to be a different approach to solving the shortfall in capacity. i would suggest the the construction of new schools would be a more appropriate way to solve the shortfall in places without impacting negatively on their education.</p>	<p>The plan for increasing specialist places at this stage is proposed to be an interim measure pending the successful outcome of Wave 13 Free Schools. The Local Authority can no longer open new schools; however we are fully supporting two free school bids and have commissioned 300 specialist places.</p> <p>If successful the earliest opening date for the new free schools would be September 2020/21.</p> <p>All the available data shows that there will be an on-going need to provide specialist provision for early years, primary and secondary phase children and young people with a range of special educational needs and disabilities throughout the Bradford District.</p> <p>The Local Authority has reviewed the capacity of all the schools proposing to increase provision, alongside the Headteachers/Governing Bodies and Academy Trusts and agreed collaboratively to the increase in specialist places.</p>
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<p>Charity, Community and Voluntary Sector</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 200</p>	<p>a)Hirstwood Arc is not mentioned in the consultation letter. Is this provision remaining the same with no additional places or will provision at Hirstwood cease to exist?</p> <p>b)We feel that the consultation is a positive recognition of the requirement for more SEND places, particularly for ASD, and we agree that places need to be create</p> <p>c)Where will the additional staff with specialist skills required to facilitate these additional places come from?</p> <p>d)We note that the Local Authority are expanding units with specialism for ASD but simultaneously cutting the ASD support team. Will this adversely affect the support available for children in these spaces?</p> <p>e) There appears to be only 4 additional places in secondary DSPs in comparison to 34 new ASD places in primary DSP. The additional places for the secondary age range seems very limited and we question whether these are located in the most appropriate area of Bradford as all in the same area.</p> <p>f) Following on from the above point, where will those children in the new additional primary places go on to secondary?</p> <p>g)Oastler school is already oversubscribed. Are the proposed 14 new places for new children in addition to those already attending or in reality are these places already filled i.e. no additional places available.</p> <p>h)The Unit at Ellar Carr is effectively doubling in size in terms of numbers. Will this have a knock on effect on the impact for children – will they still receive the same adult: child ratio and intensity of support? This could potentially be a negative for children who require a small provision in order to cope.</p> <p>i) Ellar Carr is effectively going to become a school like Oastlers but without the specialist facilities. Will the offer be expanded to match this, to include similar therapeutic work and full curriculum?</p> <p>j)We note that there is no increase in places at alternative provision e.g. city farm, prism, pipeline. Has this been considered?</p>	<p>The specialist places at Hirstwood Nursery School will cease due to the very limited take up over the last 3 years and a current occupancy of 0.</p> <p>Proposals to increase enhanced SEND places in nursery schools, could potentially lead to staff currently employed within the LA being employed in the nursery provision.</p> <p>The restructure of Teaching Support Services, including the ASD team has not yet been finalised. A new model of delivery will be out for consultation from 17th January 2018.</p> <p>All Local Authorities have a statutory duty to keep under review the provision they make for pupils with special educational needs and disabilities (SEND). This must be based on the regular review of current and future trends (pupil profiles). In monitoring these trends, data and information it has confirmed that further specialist provision is required to meet the needs of its current and future population.</p> <p>The council is looking at the best way to offer a full range of provision locally for all children. We believe that a flexible district wide model will be able to respond</p>
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effectively to local changes in demand. On further analysis of the Ilkley/Burley/Wharfedale area of the District, it is recognised that there is a growing need for local provision within the area to ensure children and young people can access specialist places without the need to travel long distances. The Local Authority has started to have some tentative discussions with schools within this part of the district and will look to commence a separate consultation process in the near future to consider the proposals for enhanced specialist provision in Ilkley/Burley/Wharfedale area of the District. This will be subject to Capital funds being available.

A proportion of the new places have already been filled by a number of children and young people. This is within the permitted percentage increase limits.

Increasing places, brings an increase in funding. Ellar Carr will receive additional funding to ensure the staff to pupil ratios can be maintained and the needs of children and young people are continued to be met. The Local Authority are proposing to redesignate Ellar Carr as a SEMH Special School. This will bring additional funding to support the facilities and the specialist offer of the



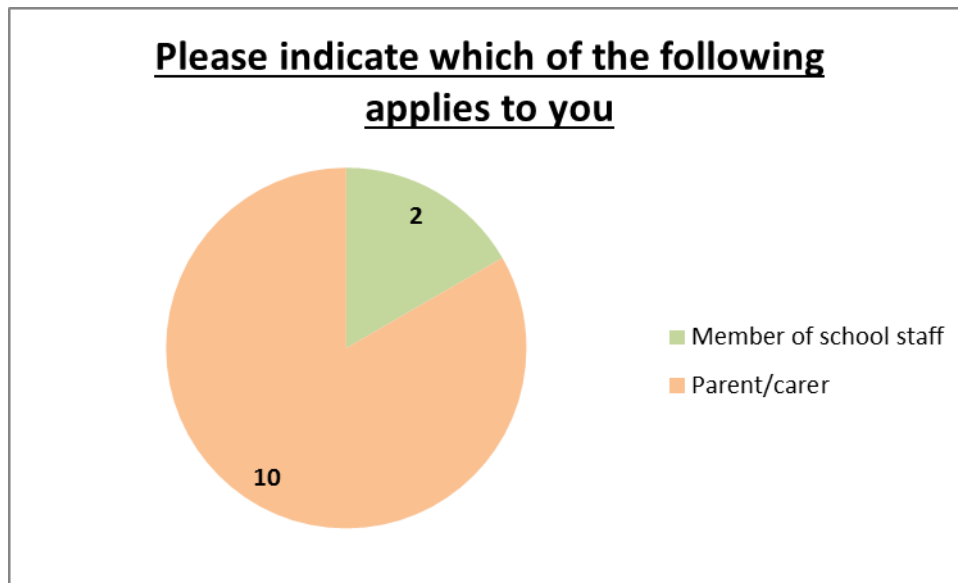
		<p>school.</p> <p>This is being considered as part of a review of behaviour and SEMH provision by the Local Authority.</p>
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Parent/carer	Hello that's really good all we wanted was that help which we're going to get hopefully. I think they should look into mainstream school as well because so many unwell children go there and they have special needs too.	Training and support for mainstream schools has been enhanced this academic year and they will continue to be able to access support for unwell children and young people from the Local Authority.
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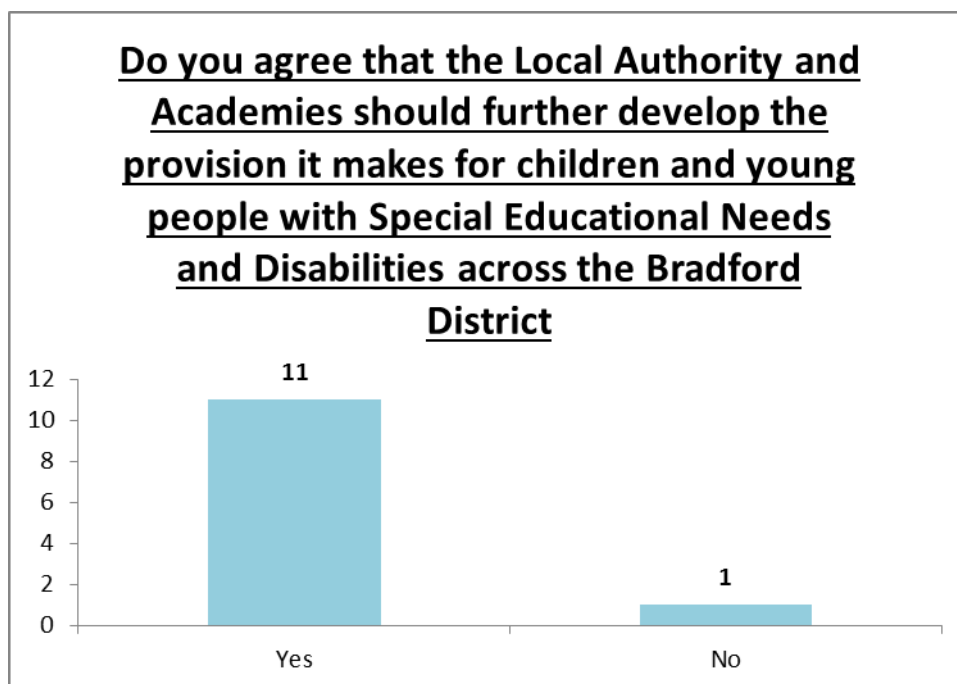


Special Schools Consultation Questionnaire Results



10 respondents were a Parent/Carer
2 respondents were a member of school staff.

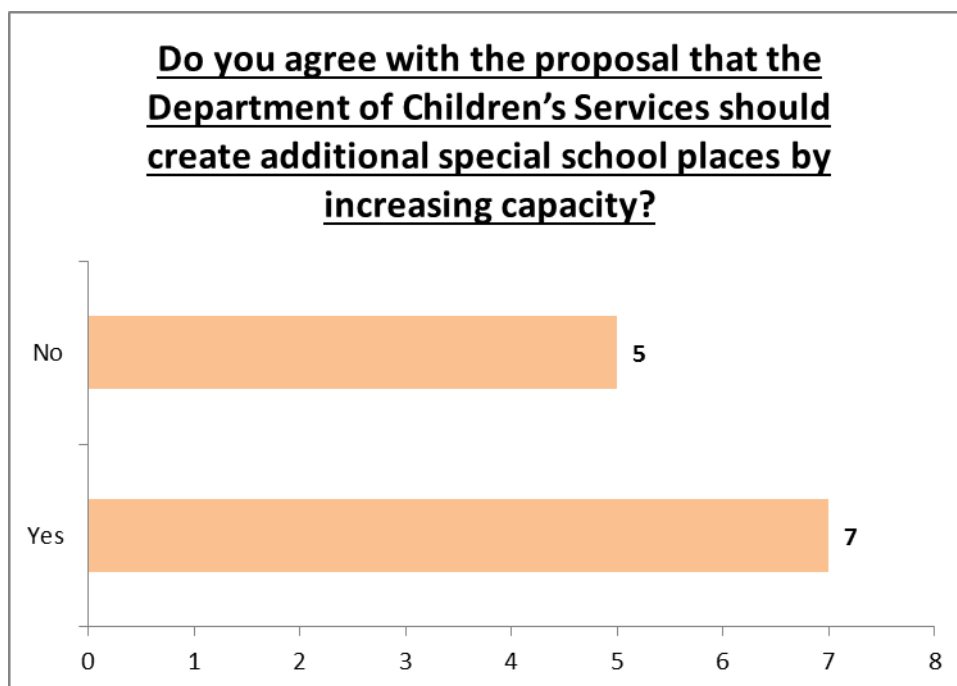




11 respondents agreed that the Local Authority and Academies should further develop the provision it makes for children and young people with Special Educational Needs and Disabilities across the Bradford District.

1 respondent disagreed that the Local Authority and Academies should further develop the provision it makes for children and young people with Special Educational Needs and Disabilities across the Bradford District. No comments were recorded by the respondent detailing why they disagreed with the proposals.





7 respondents agreed with the proposal that the Department of Children’s Services should create additional special school places by increasing capacity.

5 respondents disagreed with the proposal that the Department of Children’s Services should create additional special school places by increasing capacity. The below comments were received.

Do you want to make any additional comments or raise any other issues	
Type of respondent	Comments
Parent/Carer	Given the number of places required, it seems clear that a new generic special school is needed.
Parent/Carer	Worried increase in capacity will affect my child ability to cope and learn. New provisions needed
Parent/Carer	I have some concerns regarding the space and staff requirements of increasing special schools
Parent/Carer	There is no specialist provision particularly DSPs for children with autism in Wharfedale - why not?



Emails received concerning Special Schools Consultation

Do you want to make any additional comments or raise any other issues

Type of respondent	Comments	Local Authorities Response
Member of school staff	I have no objection to the proposal	
Parent/carer	<p>The 48 additional places at Chellow Heights. Unless the 48 are spread evenly between south and west sites, this number of extra places will put too much pressure on facilities at west. As it is, children are being moved to temporary classrooms and having to go outside in all weathers to get to the main building. The facilities in the main building itself (hydrotherapy, jungle gym etc) were designed with a certain number of children in mind, and pupils who need these facilities for physical therapy and emotional regulation will inevitably have less access to them when numbers increase.</p> <p>It's obvious that Bradford needs a new generic special school. Presumably this isn't financially possible, but surely the places should be evenly split between the existing schools? Delius are taking 24 and Phoenix 22, why are Chellow taking so many?</p> <p>The location of new ASD and communication and interaction DSPs. This doesn't affect my children directly as they attend Chellow Heights, but I was really surprised to see that the new ASD and communication and interaction DSPs are planned for Worth Valley, Green Lane, and Crossley Hall Primary Schools, all a 15 minute drive or less from existing DSPs.</p> <p>At the last round of consultation on DSPs three years ago, I lobbied along with a couple of other families for a Wharfe Valley DSP. The nearest for families from Ilkley, Addingham, Burley etc is Crossflatts,</p>	<p>The Local Authority has undertaken a SEND Strategic Review 2016- 2020 to ensure the sufficiency of specialist places for children and young people with special educational needs and disabilities (SEND) and Behaviour</p> <p>All the available data shows that there will be an on-going need to provide specialist provision for early years, primary and secondary phase children and young people with a range of special educational needs and disabilities throughout the Bradford District.</p> <p>The Local Authority has reviewed the capacity of all the schools proposing to increase provision, alongside the Headteachers/Governing Bodies and Academy Trusts and agreed collaboratively to the increase in specialist places.</p> <p>The plan for increasing specialist places at this stage is proposed to be an interim</p>



a good half hour's drive away in school run traffic. We had a meeting with Jenni Leary where we were told a Wharfe Valley DSP would be seriously considered in this round of consultations. Did that not happen? I know a number of families who would benefit from a local DSP in the Ilkley area.

measure pending the successful outcome of Wave 13 Free Schools. The Local Authority can no longer open new schools; however we are fully supporting two free school bids and have commissioned 300 specialist places.

If successful the earliest opening date for the new free schools would be September 2020/21.

The increase in places at Chellow Heights Special School is split across two sites.

On further analysis of the Ilkley/Burley/Wharfedale area of the District, it is recognised that there is a growing need for local provision within the area to ensure children and young people can access specialist places without the need to travel long distances. The Local Authority has started to have some tentative discussions with schools within this part of the district and will look to commence a separate consultation process in the near future to consider the proposals for enhanced specialist provision in Ilkley/Burley/Wharfedale area



		of the District. This will be subject to Capital funds being available.
Parent/carer	<p>I disagree with Bradford councils approach to increasing the amount of places available for send students in the Bradford area. i believe that by increasing the capacity of the currently operating schools this will increase the pressure on already struggling services and will lead to a poorer quality of education for not just the current students at the schools in question, but also the new students. the schools were designed with a maximum capacity in mind. whilst i understand that additional classrooms will be constructed in order to increase the schools capacity this will still place pressure on the schools already constructed services such as the assembly halls and sports facility's. the stretching of these current services cannot have anything but a negative effect on the students education.</p> <p>i understand that their is a need for SEND places in the Bradford area however i believe that their needs to be a different approach to solving the shortfall in capacity. i would suggest the the construction of new schools would be a more appropriate way to solve the shortfall in places without impacting negatively on their education.</p>	<p>The plan for increasing specialist places at this stage is proposed to be an interim measure pending the successful outcome of Wave 13 Free Schools. The Local Authority can no longer open new schools; however we are fully supporting two free school bids and have commissioned 300 specialist places.</p> <p>If successful the earliest opening date for the new free schools would be September 2020/21.</p> <p>All the available data shows that there will be an on-going need to provide specialist provision for early years, primary and secondary phase children and young people with a range of special educational needs and disabilities throughout the Bradford District.</p> <p>The Local Authority has reviewed the capacity of all the schools proposing to increase provision, alongside the Headteachers/Governing Bodies and Academy Trusts and agreed</p>



		collaboratively to the increase in specialist places.
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<p>Charity, Community and Voluntary Sector</p>	<ul style="list-style-type: none"> • Hirstwood Arc is not mentioned in the consultation letter. Is this provision remaining the same with no additional places or will provision at Hirstwood cease to exist? • We feel that the consultation is a positive recognition of the requirement for more SEND places, particularly for ASD, and we agree that places need to be create • Where will the additional staff with specialist skills required to facilitate these additional places come from? • We note that the Local Authority are expanding units with specialism for ASD but simultaneously cutting the ASD support team. Will this adversely affect the support available for children in these spaces? • There appears to be only 4 additional places in secondary DSPs in comparison to 34 new ASD places in primary DSP. The additional places for the secondary age range seems very limited and we question whether these are located in the most appropriate area of Bradford as all in the same area. • Following on from the above point, where will those children in the new additional primary places go on to secondary? • Oastler school is already oversubscribed. Are the proposed 14 new places for new children in addition to those already attending or in reality are these places already filled i.e. no additional places available. • The Unit at Ellar Carr is effectively doubling in size in terms of numbers. Will this have a knock on effect on the impact for children – will they still receive the same adult: child ratio and intensity of support? This could potentially be a negative for children who require a small provision in order to cope. • Ellar Carr is effectively going to become a school like Oastlers but 	<p>The specialist places at Hirstwood Nursery School will cease due to the very limited take up over the last 3 years and a current occupancy of 0.</p> <p>Proposals to increase enhanced SEND places in nursery schools, could potentially lead to staff currently employed within the LA being employed in the nursery provision.</p> <p>The restructure of Teaching Support Services, including the ASD team has not yet been finalised. A new model of delivery will be out for consultation from 17th January 2018.</p> <p>All Local Authorities have a statutory duty to keep under review the provision they make for pupils with special educational needs and disabilities (SEND). This must be based on the regular review of current and future trends (pupil profiles). In monitoring these trends, data and information it has confirmed that further specialist provision is required to meet the needs of its current and future population.</p>
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	<p>without the specialist facilities. Will the offer be expanded to match this, to include similar therapeutic work and full curriculum?</p> <ul style="list-style-type: none"> • We note that there is no increase in places at alternative provision e.g. city farm, prism, pipeline. Has this been considered? 	<p>The council is looking at the best way to offer a full range of provision locally for all children. We believe that a flexible district wide model will be able to respond effectively to local changes in demand.</p> <p>On further analysis of the Ilkley/Burley/Wharfedale area of the District, it is recognised that there is a growing need for local provision within the area to ensure children and young people can access specialist places without the need to travel long distances. The Local Authority has started to have some tentative discussions with schools within this part of the district and will look to commence a separate consultation process in the near future to consider the proposals for enhanced specialist provision in Ilkley/Burley/Wharfedale area of the District. This will be subject to Capital funds being available.</p> <p>A proportion of the new places have already been filled by a number of children and young people. This is within the permitted percentage increase limits.</p> <p>Increasing places, brings an increase in funding. Ellar Carr will receive additional funding to ensure the staff to pupil ratios can be maintained and the needs of children and young people are continued to be met. The Local Authority are proposing to redesignate</p>
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		Ellar Carr as a SEMH Special School. This will bring additional funding to support the facilities and the specialist offer of the school. This is being considered as part of a review of behaviour and SEMH provision by the Local Authority.
Parent/carer	Hello that's really good all we wanted was that help which we're going to get hopefully. I think they should look into mainstream school as well because so many unwell children go there and they have special needs too.	Training and support for mainstream schools has been enhanced this academic year and they will continue to be able to access support for unwell children and young people from the Local Authority.



Appendix B

Consultation List

Proposals to Increase and Develop SEND Places in Academies and Maintained Special Schools	
All parents of all children at: <ul style="list-style-type: none"> • Chellow Heights Special School • Delius Special School • Beechcliffe Special School • Oastlers School 	Letter – Hardcopies delivered to all settings for distribution Electronic version also sent via email
All parents of all children at: <ul style="list-style-type: none"> • Beckfoot Phoenix School • Hazelbeck School • Southfield School • High Park School 	Letter – via email Academies to print and distribute
Headteacher and Governing Body of: <ul style="list-style-type: none"> • Chellow Heights Special School • Delius Special School • Beechcliffe Special School • Oastlers School 	Letter – Hardcopies delivered to all settings for distribution Electronic version also sent via email
Headteacher and Governing Body of: <ul style="list-style-type: none"> • Beckfoot Phoenix School • Hazelbeck School • Southfield School • High Park School 	Letter – via email
All staff at: <ul style="list-style-type: none"> • Chellow Heights Special School • Delius Special School • Beechcliffe Special School • Oastlers School 	Letter – Hardcopies delivered to all settings for distribution Electronic version also sent via email
All staff at: <ul style="list-style-type: none"> • Beckfoot Phoenix School • Hazelbeck School • Southfield School • High Park School 	Letter – via email Academies to print and distribute
All Bradford Schools/Academies/PRU's – Headteachers and Governing Bodies	Letter – via email
Headteachers and Governing Bodies of	Letter – via email



Children Centre Plus	
All Trade Union Representatives	Letter – via email
Neighbouring Local Authorities Director of Children’s Services	Letter – via email
Council for Mosques	Letter – via email
Church of England Diocese and Roman Catholic Diocese	Letter – via post
Muslim Association	Letter – via email
Youth Voice	Letter – via email
Parish Councils and Neighbourhood Forums	Letter – via email
All Councillors	Letter – via email
Members of Parliament	Letter – via email
Bradford and Airedale Primary Care Trusts/Clinical Commissioning Groups	Letter – via email
SENDIASS	Letter – via email
Bradford and Airedale Parents Forum	Letter – via email
Other relevant Charities	Letter – via email

All Letters and Consultation Documents are published on:

<https://localoffer.bradford.gov.uk/Content.aspx?mid=589> - Bradford SEND Local offer
www.bradford.gov.uk/consultations
<https://bso.bradford.gov.uk>



Consultation list

Proposals to Increase and Develop SEND Places for Young Children In Maintained Nursery School's (EYESP's)	
All parents of all children at: <ul style="list-style-type: none"> St Edmunds Nursery School Strong Close Nursery School Canterbury Nursery School Abbey Green Nursery School 	Letter – Hardcopies delivered to all settings for distribution Electronic version also sent via email
Headteacher and Governing Body of: <ul style="list-style-type: none"> St Edmunds Nursery School Strong Close Nursery School Canterbury Nursery School Abbey Green Nursery School 	Letter – Hardcopies delivered to all settings for distribution Electronic version also sent via email
All staff at: <ul style="list-style-type: none"> St Edmunds Nursery School Strong Close Nursery School Canterbury Nursery School Abbey Green Nursery School 	Letter – Hardcopies delivered to all settings for distribution Electronic version also sent via email
All Bradford Schools/Academies/PRU's – Headteachers and Governing Bodies	Letter – via email
Headteachers and Governing Bodies of Children Centre Plus	Letter – via email
All Trade Union Representatives	Letter – via email
Neighbouring Local Authorities, Director of Children's Services	Letter – via email
Council for Mosques	Letter – via email
Church of England Diocese and Roman Catholic Diocese	Letter – via post
Muslim Association	Letter – via email
Youth Voice	Letter – via email
Parish Councils and Neighbourhood Forums	Letter – via email
All Councillors	Letter – via email
Members of Parliament	Letter – via email
Bradford and Airedale Primary Care Trusts/Clinical Commissioning Groups	Letter – via email
SENDIASS	Letter – via email



Bradford and Airedale Parents Forum	Letter – via email
Other relevant Charities	Letter – via email

All Letters and Consultation Documents are published on:

<https://localoffer.bradford.gov.uk/Content.aspx?mid=589> - Bradford SEND Local offer

www.bradford.gov.uk/consultations

<https://bso.bradford.gov.uk>



Consultation List

Proposals to Increase and Develop SEND Places in Academies, Maintained Schools – DSP’s and PRU’s	
All parents of all children at: <ul style="list-style-type: none"> • Crossley Hall Primary School • Crossflatts Primary School • Holy Family Catholic School • Titus Salt School • Long Lee Primary School • Cottingley Village Primary School • Ellar Carr PRU 	Letter – Hardcopies delivered to all settings for distribution Electronic version also sent via email
All parents of all children at: <ul style="list-style-type: none"> • Worth Valley Primary Academy • Green Lane Primary Academy 	Letter – via email Academies to print and distribute
Headteacher and Governing Body of: <ul style="list-style-type: none"> • Crossley Hall Primary School • Crossflatts Primary School • Holy Family Catholic School • Titus Salt School • Long Lee Primary School • Cottingley Village Primary School • Ellar Carr PRU 	Letter – Hardcopies delivered to all settings for distribution Electronic version also sent via email
Headteacher and Governing Body of: <ul style="list-style-type: none"> • Worth Valley Primary Academy • Green Lane Primary Academy 	Letter – via email
All staff at: <ul style="list-style-type: none"> • Crossley Hall Primary School • Crossflatts Primary School • Holy Family Catholic School • Titus Salt School • Long Lee Primary School • Cottingley Village Primary School • Ellar Carr PRU 	Letter – Hardcopies delivered to all settings for distribution Electronic version also sent via email
All staff at: <ul style="list-style-type: none"> • Worth Valley Primary Academy • Green Lane Primary Academy 	Letter – via email Academies to print and distribute
All Bradford Schools/Academies/PRU’s – Headteachers and Governing Bodies	Letter – via email



Headteachers and Governing Bodies of Children Centre Plus	Letter – via email
All Trade Union Representatives	Letter – via email
Neighbouring Local Authorities, Director of Children’s Services	Letter – via email
Council for Mosques	Letter – via email
Church of England Diocese and Roman Catholic Diocese	Letter – via post
Muslim Association	Letter – via email
Youth Voice	Letter – via email
Parish Councils and Neighbourhood Forums	Letter – via email
All Councillors	Letter – via email
Members of Parliament	Letter – via email
Bradford and Airedale Primary Care Trusts/Clinical Commissioning Groups	Letter – via email
SENDIASS	Letter – via email
Bradford and Airedale Parents Forum	Letter – via email
Other relevant Charities	Letter – via email

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Appendix C



Department of Children's Services

Aiming High for Children

Deputy Directors Office
Margaret McMillan Tower
Bradford
BD1 1NN

PA: Gerrard McDowell
Tel: 01274 439255

Date: 15 November 2017

Dear All,

Consultation on Proposals to Increase the number of Designated Specialist Provision (DSP) places and Pupil Referral Unit (PRU) places for children and young people with Special Educational Needs and Disabilities (SEND)

I am writing to inform you of the Council's and Academies' proposals to increase designated specialist provision places and pupil referral unit places for children and young people with SEND, with effect from April to September 2018.

Whenever the Local Authority and Academies' propose to increase places or make changes to specialist provision, all interested parties who are likely to be affected by the proposals must be consulted in the development of the proposals. Therefore this letter is to gain your views and comments, on the Local Authority's and the Academies' proposals to develop and expand existing designated specialist provision and increase pupil referral unit places for children and young people with a range of Special Educational Needs and Disabilities as set out below:

The Local Authority is proposing to increase the number of Designated Specialist Provision places for pupils in Bradford's maintained schools by:

1. Developing new provision for primary aged children and young people with communication and interaction needs including autistic spectrum disorders (ASD) at:
 - Crossley Hall Primary School – 12 places proposed by September 2018
2. Expanding the existing provision for primary aged children and young people with communication and interactions including autistic spectrum conditions (ASD) at:
 - Crossflatts Primary School from 12 places to 16 places proposed by April 2018



3. Expanding the existing provision for secondary aged children and young people with communication and interactions including autistic spectrum conditions (ASD) at:

- Holy Family Catholic School from 12 places to 16 places proposed by April 2018

4. Expanding the existing provision for secondary aged children and young people with cognition and learning needs at:

- Titus Salt School from 16 places to 30 places proposed by April 2018

5. Developing new provision for primary aged children and young people with social emotional and mental health needs (SEMH) at:

- Long Lee Primary School – 10 places proposed by April 2018
- Cottingley Village Primary School – 10 places proposed by April 2018

The Local Authority is proposing to increase the number of Pupil Referral Unit places for pupils by:

1. Expanding the existing provision for secondary aged children and young people with social emotional and mental health needs (SEMH) at:

- Ellar Carr Pupil Referral Unit (PRU) from 36 places to 70 places proposed by April 2018

The following Academies are also proposing to increase the number of Designated Specialist Provision places by:

1. Developing new provision for primary aged children and young people with communication and interaction needs including autistic spectrum disorders (ASD) at:

- Green Lane Primary School – 12 places proposed by September 2018
- Worth Valley Primary Academy – 8 places proposed by April 2018

2. Expanding the existing provision for primary aged children and young people with speech language and communication needs (SLCN) at:

- Green Lane Primary School from 9 places to 12 places proposed by April 2018

The Local Authority is working closely with the Academies on their proposals and is carrying out the consultation process on their behalf.

Further detailed information on all of the above proposals can be found in the supporting Consultation Documents located online at:

<https://localoffer.bradford.gov.uk/Content.aspx?mid=589> - Bradford SEND Local offer

www.bradford.gov.uk/consultations

<https://bso.bradford.gov.uk>



Background Information

The Local Authority and Academies offer a range of educational provision across the Bradford District including Special schools, Pupil Referral Units (PRU's), Designated Specialist Provision (DSP's), Additionally Resourced Centres (ARC's), Mainstream schools and Academies.

These proposals will expand and develop further specialist provision to enhance the network of DSP's and PRU's which form part of:

- A coherent geographical spread of provision across the District
- A dynamic network
- Flexible and responsive provision

The development of Designated Specialist Provision (DSP) and Pupil Referral Units (PRU) are based on the following principles:

- All children are to be valued equally, regardless of their ability, behaviour, family circumstances, ethnic origin, gender and sexual orientation
- All children are to be provided with the best learning opportunities, environment and experience which maximises inclusion into mainstream classes
- All children are entitled to a broad, balanced and relevant curriculum which is differentiated to meet individual needs
- Children's diverse special educational needs and disabilities require a range of flexible and varied provision

The Local Authority maintains six designated specialist provisions three for primary aged pupils and three for secondary aged pupils. In addition there are four primary and eight secondary academies who also host designated specialist provisions.

The Local Authority maintains four Pupil Referral Units for children and young people with SEMH, one for primary aged pupils and three for secondary aged pupils.

The SEN Improvement Test

When proposing changes to existing SEND provision Proposers have to meet the SEN Improvement Test and be able to demonstrate that the proposed arrangements are likely to lead to improvement in the standard, quality and/or range of educational provision for children with special educational needs and disabilities.

Information on all of the above required improvements is detailed in the consultation document and full SEN Improvement Test which is located online.

Consultation

The local community and other interested parties are also being consulted on the proposals. (Further details of who we are consulting with can be found online).



Prior to making any decisions in relation to the proposals for maintained schools/PRU's (Crossley Hall Primary School, Crossflatts Primary School, Holy Family Catholic School, Titus Salt School, Long Lee Primary School, Cottingley Village Primary School and Ellar Carr PRU) the responses to the consultation will be fully analysed and considered before the Council decides whether to publish statutory notices in the local newspapers.

In relation to the academies proposals, the academy trusts will consider the responses to the consultation and decide whether to submit a proposal for change and full business case (if needed) to the Regional Schools Commissioner for permission in relation to their proposals.

Consultation documents

If you would like further information about the proposals please refer to the following documents:

- Consultation document – DSP's & PRU's
- SEN Improvement Test – DSP's & PRU's
- Evidence of Need
- Equality Impact Assessment
- Maps showing Current and Proposed Provision
- Full list of Consultees
- Consultation Questionnaire

All of the above documents can be found online by visiting:

<https://localoffer.bradford.gov.uk/Content.aspx?mid=589> - Bradford SEND Local offer
www.bradford.gov.uk/consultations
<https://bso.bradford.gov.uk>

If you do not have access to the internet or you would prefer a paper copy of any of the documents, please contact telephone 01274 439261 or email Localoffer@bradford.gov.uk

The Local Authority is working closely with the Academies on their proposals and is carrying out the consultation process on their behalf.

Details of how you may respond to the Local Authority's and the Academies' consultation are set out below:

Online Responses

Online responses can be made by visiting:

<https://localoffer.bradford.gov.uk/Content.aspx?mid=589> - Bradford SEND Local offer
www.bradford.gov.uk/consultations
<https://bso.bradford.gov.uk>



Alternatively please send responses to Emma Hamer, Planning and Project Manager, SEND Services, 5th Floor Margaret McMillan Tower, Bradford BD1 1NN.

If you do not have access to the internet or you would prefer a paper copy of any of the documents, please contact telephone 01274 439261 or email Localoffer@bradford.gov.uk

Consultation Meetings

You can attend a public consultation meeting. They are being held on the below dates:

Monday 27th November 7pm - 8pm at Central Hall Keighley –
Alice Street, Keighley, BD21 3JD

Tuesday 5th December 7pm – 8pm at Margret McMillan Tower –
Princes Way, Bradford, BD1 1NN

Tuesday 12th December 7pm - 8pm at Queensbury Victoria Hall –
Children's Centre, Station Road, Queensbury, BD13 1AB

The consultation closes on Thursday 14th December 2017. All responses must be received by this date.

Your views are important to us, thank you.

Yours sincerely,

Judith Kirk
Deputy Director
Education, Employment and Skills



Proposals for Increasing Specialist Provision for Children and Young People with Special Education Needs and Disabilities (SEND)

Proposed Increase in Numbers of Pupils at Special Schools Consultation document

**Your views are important to us.
We would like to gain your views and comments on the council and academies' proposals and provide you with the opportunity to ask questions and discuss the proposals.**

November 2017



The Consultation

Background information

The Local Authority and Academies offers a range of educational provision across the Bradford District including Special schools, Pupil Referral Units (PRU's), Designated Specialist Provision (DSP's), Additionally Resourced Centres (ARC's), Mainstream schools and Academies.

Currently the Local Authority maintains four special schools, one for secondary pupils with social, emotional and mental health (SEMH) difficulties and three generic special schools, two primaries and one secondary who manage the varying needs of children who require a protected environment in a specially resourced school in order to make progress.

In addition, there are four Special School Academies, one for all-age pupils with communication and interaction (C&I) needs which may include Autistic Spectrum conditions (ASC) and three generic special schools, two secondary and one primary who manage the varying needs of children who require a protected environment in a specially resourced school in order to make progress.

The special schools broadly cover 3 areas of the District and manage the varying needs of children who require a protected environment in a specially resourced school in order to make progress.

Table showing current Special School Provision

School	Area of Need	Registered Places	Maintained school or Academy	Phase
Chellow Heights	Generic	165	Maintained	Primary
Delius	Generic	110	Maintained	Primary
Beechcliffe	Generic	100	Maintained	Secondary
Oastlers	SEMH	80	Maintained	Secondary
Beckfoot Phoenix	Generic	80	Academy	Primary
Hazelbeck	Generic	120	Academy	Secondary
Southfield	Generic	265*	Academy	Secondary
High Park	C&I	95	Academy	All age

*Includes 12 EDSP places

Generic = A wide range of learning needs and complex health needs

SEMH = Social emotional and mental health needs

C&I = Communication and Interaction needs including autism



What are we proposing and where?

The Local Authority is proposing to increase the number of places for pupils in the following maintained Special Schools with effect from April to September 2018:

- Chellow Heights Special School – 48 additional places proposed by April 2018
- Delius Special School – 24 additional places - proposed by September 2018
- Beechcliffe Special School – 30 additional places - proposed by April 2018
- Oastlers School – 14 additional places - proposed by April 2018

The following Academies are proposing to increase the number of places for pupils in the following Academy Special Schools with effect from April to September 2018:

- Beckfoot Phoenix School – 22 additional places proposed by September 2018
- Hazelbeck School – 8 additional places proposed by April 2018
- Southfield School – 32 additional places (inc. 12 EDSP places) proposed by April 2018
- High Park School – 12 additional places proposed by April 2018

The Local Authority is working closely with the academies on their proposals and is also carrying out the consultation process on their behalf.

These proposals set out to increase provision, by creating an additional 190 Special School Places for primary and secondary aged pupils with a range of special educational needs and disabilities across Bradford Maintained and Academy schools.

Why are we proposing to increase provision?

The Bradford District has experienced a significant increase in demand for Special Educational Needs and Disabilities (SEND) provision in the last 10 years.

It is projected that the demand for SEND provision will continue to grow and that in the next 3 years a minimum of 360 additional specialist places across all sectors (DSP's, Special Schools and Pupil Referral Units) in the Bradford District will be required.

- There is an urgent need for more specialist places in Bradford due to the increase in population
- Currently only 1% of Bradford's Special Educational Needs and Disabilities pupils are in special schools and there is a growing need for more specialist places to meet need and demand
- All children are to be valued equally, regardless of their ability, behaviour, family circumstances, ethnic origin, gender and sexual orientation



- All children are to be provided with the best learning opportunities, environment and experience which maximises their learning
- All children are entitled to a broad, balanced and relevant curriculum which is differentiated to meet individual needs
- Children's diverse special educational needs and disabilities require a range of flexible and varied provision

When are the Council and Academies proposing to increase provision?

Before the Local Authority can increase provision in maintained schools, there is a statutory process that we must follow. Whenever the Local Authority proposes to increase the number of places at special schools or make changes to specialist provision, all interested parties who are likely to be affected by the Councils proposals must be consulted in the development of the proposals prior to publication of statutory notices.

In relation to the academies proposals, the academies will consider the responses to the consultation and decide whether to submit a proposal for change and full business case to the Regional Schools Commissioner for permission in relation to their proposals.

A timeline for completing the consultation processes and statutory process is set out below:

Activity	Timescales
Consultation period for maintained schools and academies begins	16 th November 2017
Consultation period for maintained schools and academies ends	14 th December 2017
For maintained schools the Director of Children's Services considers consultation responses and decides whether to publish statutory notices	14 th to 21 st December 2017
Academies consider the consultation responses and write Business Cases	14 th to 22 nd December 2017
Statutory notices published in the local newspapers (Consultation period begins)	4 th January 2018
End of 4 week Statutory Consultation period	1 st February 2018
Academies submit their full Business Cases to the DfE and RSC	4 th January 2017
Report to Executive to consider outcome of consultation and statutory notices and determine proposals	6 th March 2018
Academies receive confirmation of approval from DfE and RSC	January to March 2018
Proposed implementation date	April to September 2018



How will this affect my child? And is this the best option for Children and Young people with SEND?

The Local Authority and Academies offer a range of educational provision across the Bradford District including Special schools, Designated Specialist Provision (DSP's), Pupil Referral Units (PRU's), Additionally Resourced Centres (ARC's), Mainstream schools and Academies.

These proposals set out to increase provision, by creating an additional 190 Special School Places for primary and secondary aged pupils with a range of special educational needs and disabilities across Bradford Maintained and Academy schools which form part of:

- A coherent geographical spread of provision across the District
- A Network of special schools
- Flexible and responsive provision

Children and Young People with a range of Special Educational Needs and Disabilities will continue to be well served in Bradford. The council is looking at the best way to offer a full range of provision locally for all children. We believe that a flexible district wide model will be able to respond effectively to local changes in demand.

The proposed changes will ensure the continued delivery of high quality and cost effective provision for the Children and Young People of Bradford.

Who are we consulting with?

- Parents/Carers
- School staff and Governors
- Bradford and Airedale Parents Forum
- Bradford and Airedale NHS Trusts/CCG's
- Elected members
- Local MPs
- Trade Unions
- Neighbouring Authorities
- SENDIASS - Barnado's
- Parish & Mosque Councils
- Muslim Association
- CoE and Catholic Diocese for Bradford/Leeds
- Relevant charities and voluntary organisations
- Any other interested parties



Why are we consulting with you?

Whenever the Local Authority and Academies propose to increase places or make changes to maintained special schools, all interested parties who are likely to be affected by the proposals must be consulted in the development of the proposals.

It is important that the proposals are the subject of broad consultation with all interested parties to ensure that your views are considered and that you are fully informed and involved before a final recommendation is made.

The responses to this consultation for maintained special schools must be fully analysed and considered before the Council decides to publish statutory notices in the local newspapers. The final decision on the proposals to increase the number of places in maintained special schools rests with the Council's Executive.

In the case of academies the academy trusts will be required to submit a full business case to the Department for Education (DfE) outlining their proposed changes. The academy trusts will be required to confirm as part of their business case that a fair and open local consultation has taken place.

The Local Authority is working closely with the academies and is also carrying out the academy school's consultations on behalf of the academy trusts alongside the consultation process for maintained schools. However the final decision on the academies' proposals rests with the DfE and the Regional Schools Commissioner.

In addition, when proposing changes to existing SEND provision the Council and Academies have to meet the SEN Improvement Test and be able to demonstrate that the proposed arrangements are likely to lead to improvement in the standard, quality and/or range of educational provision for children with special educational needs and disabilities.

Information on the required improvements is detailed in the full SEN Improvement Test which is located online.

How to respond to the consultation

- **Please refer to the below supporting documents:**
 - SEN Improvement Test – Special Schools, Academies and Early Years
 - Evidence of Need
 - Equality Impact Assessment
 - Maps showing Special Schools
 - Full list of Consultees
 - Consultation Questionnaire

All of the above documents can be found online by visiting:



<https://localoffer.bradford.gov.uk/Content.aspx?mid=589> - Bradford SEND Local offer
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If you do not have access to the internet or you would prefer a paper copy of any of the documents, please contact telephone 01274 439261 or email Localoffer@bradford.gov.uk

- **Complete the Consultation Questionnaire for both maintained schools and academies or let us have your comments no later than Thursday 14th December 2017**
- **The Local Authority is working closely with the academies on their proposals and is carrying out the consultation process on their behalf.**

Online responses can be made by visiting:

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- **Attend one of the Public Consultation Meetings, they are being held on the below dates:**

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Tuesday 12th December 7pm - 8pm at Queensbury Victoria Hall –
 Children's Centre, Station Road, Queensbury, BD13 1AB

Thank you for taking the time to read this consultation document. Your views are important. Please make your views known to us by completing the Consultation questionnaire or submitting your comments.

Thank you



Proposals for Increasing Specialist Provision for Children and Young People with Special Education Needs and Disabilities (SEND)

Proposed Development and Increase of places at Designated Specialist Provisions (DSP's) and Pupil Referral Unit's (PRU's) Consultation document

Your views are important to us.

We would like to gain your views and comments on the Council and Academies' proposals and provide you with the opportunity to ask questions and discuss the proposals.

November 2017



The Consultation

Background information

The Local Authority and Academies offer a range of educational provision across the Bradford District including Special schools, Pupil Referral Units (PRU's), Designated Specialist Provision (DSP's), Additionally Resourced Centres (ARC's), Mainstream schools and Academies.

Currently the Local Authority maintains six designated specialist provisions three for primary aged pupils and three for secondary aged pupils. In addition there are four primary and eight secondary academies who also host designated specialist provisions.

Table showing current Designated Specialist Provision

School	Area of Need	Registered Places	Maintained school or Academy	Phase
Crossflatts	ASD	12	Maintained	Primary
Denholme	ASD	8	Academy	Primary
Haworth	ASD	12	Academy	Primary
Carrwood	ASD	12	Maintained	Primary
Bradford Academy	ASD	12	Academy	Secondary
Parkside	ASD	12	Maintained	Secondary
Holy Family	ASD	12	Maintained	Secondary
Southfield Grange	ASD	12	Academy	Secondary
Grange Technology	ASD	12	Academy	Secondary
Titus Salt	LD	15	Maintained	Secondary
Beckfoot Thornton	LD	15	Academy	Secondary
Bradford Forster Academy	LD	15	Academy	Secondary
Green Lane	SLCN	9	Academy	Primary
High Craggs	SLCN	6	Academy	Primary
Oasis Lister Park	SLCN	4	Academy	Secondary
Beckfoot	PD	10	Academy	Secondary
Bradford Academy	PD	15	Academy	Secondary
Learn & Play – High Park Special School	C&I /ASD	16	Academy	Early Years

ASD = Autism

LD = Learning Difficulties

SLCN = Speech Language and Communication Needs

C& I / ASD = Communication and Interaction needs including Autism

PD = Physical Difficulties



The Local Authority currently maintains 4 Pupil referral Units for children and young people with Social Emotional and Mental Health Needs (SEMH), one for primary aged pupils and three for secondary aged pupils.

Table showing current Designated Specialist Provision

School	Area of Need	Registered Places	Maintained school or Academy	Phase
Park Primary PRU	SEMH	50	Maintained	Primary
Ellar Carr	SEMH	36	Maintained	Secondary
District PRU	SEMH	160	Maintained	Secondary
Central PRU	SEMH	50	Maintained	Secondary

SEMH = Social Emotional and Mental Health

What are we proposing and where?

The Local Authority is proposing to increase the number of Designated Specialist Provision places for pupils in maintained schools with effect from April to September 2018 by:

- Developing new provision for primary aged children and young people with communication and interaction needs including autistic spectrum disorders (ASD) at:
 - Crossley Hall Primary School – 12 places proposed by September 2018
- Expanding the existing provision for primary aged children and young people with communication and interactions including autistic spectrum conditions (ASD) at:
 - Crossflatts Primary School from 12 places to 16 places proposed by April 2018
- Expanding the existing provision for secondary aged children and young people with communication and interactions including autistic spectrum conditions (ASD) at:
 - Holy Family Catholic School from 12 places to 16 places proposed by April 2018
- Expanding the existing provision for secondary aged children and young people with cognition and learning needs at:
 - Titus Salt School from 16 places to 30 places proposed by April 2018
- Developing new provision for primary aged children and young people with social emotional and mental health needs (SEMH) at:
 - Long Lee Primary School – 10 places proposed by April 2018
 - Cottingley Village Primary School – 10 places by April 2018



The Local Authority is proposing to increase the number of Pupil Referral Unit places for pupils with effect from April to September 2018 by:

- Expanding the existing provision for secondary aged children and young people with social emotional and mental health needs (SEMH) at:
 - Ellar Carr Pupil Referral Unit (PRU) from 36 places to 70 places proposed by April 2018

The following Academies are proposing to increase the number of Designated Specialist Provision places with effect from April to September 2018 by:

- Developing new provision for primary aged children and young people with communication and interaction needs including autistic spectrum disorders (ASD) at:
 - Green Lane Primary School – 12 places proposed by September 2018
 - Worth Valley Primary Academy – 8 places proposed by April 2018
- Expanding the existing provision for primary aged children and young people with speech language and communication needs (SLCN) at:
 - Green Lane Primary School from 9 places to 12 places proposed by April 2018

The Local Authority is working closely with the Academies on their proposals and is carrying out the consultation process on their behalf.

These proposals set out to increase provision, by creating an additional 77 Designated Specialist Places for primary and secondary aged pupils with a range of special educational needs and disabilities across Bradford Maintained and Academy schools.

These proposals also set out to increase SEMH provision by creating an additional 34 Pupil Referral Unit places.

Why are the Council and Academies proposing to increase provision?

The Bradford District has experienced a significant increase in demand for Special Educational Needs and Disabilities (SEND) provision in the last 10 years.

It is projected that the demand for SEND provision will continue to grow and that in the next 3 years a minimum of 360 additional specialist places across all sectors (DSP's, Special Schools and Pupil Referral Units) in the Bradford District will be required.



- There is an urgent need for more specialist places in Bradford due to the increase in population
- Currently only 1% of Bradford's Special Educational Needs and Disabilities pupils are in special schools and there is a growing need for more specialist places to meet need and demand
- All children are to be valued equally, regardless of their ability, behaviour, family circumstances, ethnic origin, gender and sexual orientation
- All children are to be provided with the best learning opportunities, environment and experience which maximises their learning
- All children are entitled to a broad, balanced and relevant curriculum which is differentiated to meet individual needs
- Children's diverse special educational needs and disabilities require a range of flexible and varied provision

These proposals will expand and develop further specialist provision to enhance the network of DSP's and PRU's which form part of:

- A coherent geographical spread of provision across the District, minimising travel times
- A dynamic network for sharing best practice and experience
- Flexible and responsive provision to best meet the needs

When are we proposing to increase provision?

Before the Local Authority can increase provision in maintained schools, there is a statutory process that we must follow. Whenever the Local Authority proposes to increase places or make changes to specialist provision, all interested parties who are likely to be affected by the Councils proposals must be consulted in the development of the proposals prior to publication of statutory notices.

In relation to the academies proposals, the academies will consider the responses to the consultation and decide whether to submit a proposal for change and full business case to the Regional Schools Commissioner for permission in relation to their proposals.

A timeline for completing the consultation and statutory processes is set out below:

Activity	Timescales
Consultation period for maintained schools and academies begins	16 th November 2017
Consultation period for maintained schools and academies ends	14 th December 2017
For maintained schools the Director of Children's Services considers consultation responses and decides whether to publish statutory notices	14 th to 21 st December 2017



Academies consider the consultation responses and write Business Cases	14 th to 22 nd December 2017
Statutory notices published in the local newspapers (Consultation period begins)	4 th January 2018
Academies submit their full Business Cases to the DfE and RSC	4 th January 2017
End of 4 week Statutory Consultation period	1 st February 2018
Academies receive confirmation of approval from the DfE and RSC	January to March 2018
Report to Council Executive to consider the outcome of consultation and statutory notices and determine proposals (maintained schools only)	6 th March 2018
Proposed implementation date	April to September 2018

How will this affect my child? And is this the best option for Children and Young people with SEND?

The Local Authority and Academies offer a range of educational provision across the Bradford District including Special schools, Designated Specialist Provision (DSP's), Pupil Referral Units (PRU's), Additionally Resourced Centres (ARC's), Mainstream schools and Academies.

These proposals set out to create an additional 77 Designated Specialist Provision (DSP) places for pupils with a range of Special Educational Needs and Disabilities and also proposes to increase SEMH provision by creating an additional 34 Pupil Referral Unit places.

Children and Young People with a range of Special Educational Needs and Disabilities will continue to be well served in Bradford. The council is looking at the best way to offer a full range of provision locally for all children. We believe that a flexible district wide model will be able to respond effectively to local changes in demand.

The proposed changes will ensure the continued delivery of high quality and cost effective provision for the Children and Young People of Bradford.

The Council intend to have a District wide structure of DSP's and PRU's that will:

- Provide local DSP's and PRU's, reducing the need for pupils to travel long distances across the District
- Provide an equitable distribution of DSP's and PRU's for children and young people with special educational needs and disabilities
- Provide increased access to the curriculum; both social and academic will be increased due to the staffing experience and capacity of the new DSP's and PRU's.



It will be possible to individually differentiate and support the work and potential of each individual pupil

- Provide an increased level of available support to all pupils and will give the greatest opportunity to increase inclusion for DSP and PRU pupils who are otherwise very vulnerable
- Provide an improved support network, especially related to training that will support and develop the proposals
- Extend and target multi-agency support into the new DSP's and PRU's especially from the health authority and more specifically speech and language therapy.
- Provide a progression pathway from Primary phase to Secondary phase.

Who are we consulting with?

- Parents/Carers
- School staff and Governors
- Bradford and Airedale Parents Forum
- Bradford and Airedale NHS Trusts/CCG's
- Elected members
- Local MPs
- Trade Unions
- Neighbouring Authorities
- SENDIASS - Barnado's
- Parish & Mosque Councils
- Muslim Association
- CoE and Catholic Diocese for Bradford/Leeds
- Relevant charities and voluntary organisations
- Any other interested parties

Why are we consulting with you?

Whenever the Local Authority and Academies propose to increase places or make changes to specialist provision, all interested parties who are likely to be affected by the proposals must be consulted in the development of the proposals.

It is important that the proposals are the subject of broad consultation with all interested parties to ensure that your views are considered and that you are fully informed and involved before a final recommendation is made.

The responses to this consultation for maintained schools must be fully analysed and considered before the Council decides to publish statutory notices in the local newspapers. The final decision on the proposals for increasing places and alteration of SEND provision at maintained schools rests with the Council Executive.



In the case of academies the academy trusts will be required to submit a full business case to the Department for Education (DfE) outlining their proposed changes. The academy trusts will be required to confirm as part of their business case that a fair and open local consultation has taken place.

The Local Authority is working closely with the academies and is carrying out the academy school consultations on behalf of the academy trusts alongside the consultation process for maintained schools. However the final decision on the academies proposals rests with the DfE and the Regional Schools Commissioner.

In addition, when proposing changes to existing SEND provision the Proposers have to meet the SEN Improvement Test and be able to demonstrate that the proposed arrangements are likely to lead to improvement in the standard, quality and/or range of educational provision for children with special educational needs and disabilities.

Information on the required improvements is detailed in the full SEN Improvement Test which is located online.

How to respond to the consultation

- **Please refer to the below supporting documents:**
 - SEN Improvement Test – DSP's & PRU's
 - Evidence of Need
 - Equality Impact Assessment
 - Maps showing Current and Proposed Provision
 - Full list of Consultees
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- **The Local Authority is working closely with the academies on their proposals and is carrying out the consultation process on their behalf.**



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Princes Way, Bradford, BD1 1NN

Tuesday 12th December 7pm - 8pm at Queensbury Victoria Hall –
Children’s Centre, Station Road, Queensbury, BD13 1AB

Thank you for taking the time to read this consultation document. Your views are important. Please make your views known to us by completing the Consultation questionnaire or let us have your comments.

Thank you



Proposals for Increasing Specialist Provision for Young Children with Special Education Needs and Disabilities (SEND)

Proposed Increase of Early Years Enhanced Specialist Provision places Consultation document

Your views are important to us.

We would like to gain your views and comments on the council's proposals and provide you with the opportunity to ask questions and discuss the proposals.

November 2017



The Consultation

Background information

The Local Authority and Academies offer a range of educational provision across the Bradford District including Special schools, Pupil Referral Units (PRU's), Designated Specialist Provision (DSP's), Additionally Resourced Centres (ARC's), Mainstream schools and Academies.

Currently the Local Authority maintains three Nursery Schools across the District which deliver integrated early years enhanced specialist provision for Children primarily aged 2 - 5 years alongside mainstream Nursery Schools places as part of the Children's Centre plus provision.

The children that access these provisions have an Education Health and Care Plan or are undergoing assessment for an Education Health and Care Plan.

The current maintained Nursery Schools with Early Years Enhanced Specialist Provision are:

- Strong Close Nursery School (BD21)
- St. Edmunds Nursery School (BD8)
- Canterbury Nursery School (BD5)

Table showing current Provision for Children primarily aged 2 – 5 years old
(Children aged 5 years+ would be by exception)

Name of Provision	Registered Places 3-5 years (No. of FTE places)	Registered Places 0-2 years (No. of FTE places)	Current Occupancy (No. of children)
Strong Close Nursery School	12	8	18
St Edmunds Nursery School	12	8	19
Canterbury Nursery School	12	8	15
Hirstwood Nursery School	12	8	0
Barkerend CC+	12	4	4
Woodroyd CC+	12	4	3

In addition the Local Authority maintains two generic Primary Special Schools that provide Early Years Enhanced Specialist Provision and manage the varying needs of children who require a protected environment in a specially resourced school in order to make progress.



Maintained Special Schools:

- Chellow Heights Special School
- Delius Special School

Furthermore, there are two Special School Academies, one for all-age pupils with communication and interaction (C&I) needs which may include Autistic Spectrum conditions (ASC) and one generic primary special school.

Academy Special Schools:

- Beckfoot Phoenix School
- High Park School

What are we proposing and where?

The Local Authority is proposing to increase the number of Early Years Enhanced Specialist Provision places for pupils in Bradford's maintained Nursery Schools by:

1. Increasing the number of Early Years Enhanced Specialist Provision places at:

- Strong Close Nursery School
- St. Edmunds Nursery School
- Canterbury Nursery School

2. Developing new Early Years Enhanced Specialist Provision at:

- Abbey Green Nursery School

These proposals set out to increase provision across the District, by creating an additional 28 x 0.6 Early Years Enhanced Specialist Provision places for children aged 2 – 5 years but with capacity for some children aged 5+ where appropriate with a range of special educational needs and disabilities.

This means there will be a total of 76 full time equivalent places across the proposed 4 EYESP's which equates to 130 x 0.6 places, that can be used flexibly across the District.

The Early Years Enhanced Specialist places in the maintained and academy Special School's will not be affected by these proposals, as their places will be in addition to the Nursery School places.



Why are we proposing to increase provision?

The Bradford District has experienced a significant increase in demand for Special Educational Needs and Disabilities (SEND) provision in the last 10 years.

These proposals will create additional Early Years Enhanced Specialist places and develop further specialist provision to enhance the network of high quality Nursery Schools which form part of:

- A coherent geographical spread of enhanced provision across the District
- A dynamic network for sharing best practice and experience
- Flexible and responsive provision to best meet needs

The proposed development and expansion of Early Years Enhanced Specialist Provision is based on the following principles:

- There is an urgent need in Bradford for more specialist places due to the increase in population
- The complexity of special needs in Bradford is increasing; as a result there is a need for more enhanced specialist places.
- Bradford is a highly inclusive local authority; only 1% of our school population are in Special Schools
- All children are to be valued equally, regardless of their ability, behaviour, family circumstances, ethnic origin, gender and sexual orientation
- All children are to be provided with the best learning opportunities, environment and experience which maximises their learning
- All children are entitled to a broad, balanced and relevant curriculum which is differentiated to meet individual needs
- Children's diverse special educational needs require a range of flexible and varied provision

When are we proposing to increase provision?

Before the Local Authority can increase provision in maintained schools, there is a statutory process that we must follow. Whenever the Local Authority proposes to increase the number of school places or make changes to specialist provision, all interested parties who are likely to be affected by the Councils proposals must be consulted in the development of the proposals prior to publication of statutory notices.



A timeline for completing the consultation and statutory processes is set out below:

Activity	Timescales
Consultation period begins	16 th November 2017
Consultation period ends	14 th December 2017
Director of Children's Services considers consultation responses and decides whether to publish statutory notices	14 th to 21 st December 2017
Statutory notices published in the local newspapers (Consultation period begins)	4 th January 2018
End of 4 week Consultation period	1 st February 2018
Report to Executive to consider outcome of consultation and statutory notices and determine proposals	6 th March 2018
Proposed implementation date	April to September 2018

How will this affect my child? And is this the best option for Young Children with SEND?

The Local Authority and Academies offer a range of educational provision across the Bradford District including Special schools, Pupil Referral Units (PRU's), Designated Specialist Provision (DSP's), Additionally Resourced Centres (ARC's), Mainstream schools and Academies.

There are currently three Nursery Schools across the District already providing integrated early years special educational and disabilities (SEND) and mainstream nursery places (currently part of the Children's Centre plus provision) at:

- Strong Close Nursery School (BD21)
- St. Edmunds Nursery School (BD8)
- Canterbury Nursery School (BD5)

These proposals set out to increase provision across the District, by creating an additional 28 x 0.6 early years enhanced specialist provision places for children aged 2 – 5 years but with capacity for some children aged up to 5+ where appropriate with a range of special educational needs and disabilities. This means there will be a total of 76 full time equivalent places across the proposed 4 EYESP's which equates to 130 x 0.6 places, that can be used flexibly across the District.

The Early Years Enhanced Specialist places in the maintained and academy Special School's will not be affected by these proposals, as there places will be in addition to the Nursery School places.



Young Children with a range of Special Educational Needs and Disabilities will continue to be well served in Bradford. The council is looking at the best way to offer a full range of provision locally for all children. We believe that a flexible district wide model will be able to respond effectively to local changes in demand.

The proposed changes will ensure the continued delivery of high quality and cost effective provision for the Young Children of Bradford.

The Council intend to have a District wide structure of Early Years Enhanced Specialist Provision's (EYESP's) that will:

- Ensure there is early identification, early assessment and early intervention of SEND
- Build responsive services, with a more personalised offer
- Increase high quality places to meet a growing need for SEND
- To make the most effective use of the outstanding practice and provision across the Bradford District
- Ensure there are effective transitions from home into provision and into schools
- Ensure continued use of our specialist knowledge, skills and expertise in meeting the need of children and young people with SEND
- Build capacity and expertise within SEND across the District and further develop Bradford's sector led model
- Ensure accessibility of SEND support and provision and support parental choice and aspirations
- Ensure there is local provision to reduce the need to travel long distances
- Provide an equitable distribution of EYESP's for young children with SEND

Who are we consulting with?

- Parents/Carers
- School staff and Governors
- Bradford and Airedale Parents Forum
- Bradford and Airedale NHS Trusts/CCG's
- Elected members
- Local MPs
- Trade Unions
- Neighbouring Authorities
- SENDIASS - Barnado's
- Parish & Mosque Councils
- Muslim Association
- CoE and Catholic Diocese for Bradford/Leeds
- Relevant charities and voluntary organisations
- Any other interested parties



Why are we consulting with you?

Whenever the Local Authority proposes to increase places or make changes to maintained nursery schools, all interested parties who are likely to be affected by the proposals must be consulted in the development of the proposals.

It is important that the proposals are the subject of broad consultation with all interested parties to ensure that your views are considered and that you are fully informed and involved before a final recommendation is made.

The responses to this consultation for maintained nursery schools must be fully analysed and considered before the Council decides to publish statutory notices in the local newspapers. The final decision on the proposals to increase the number of Early Years Enhanced Specialist Provision places in maintained nursery schools rests with the Council's Executive.

In addition, when proposing changes to existing SEND provision the Proposers (The Local Authority) have to meet the SEN Improvement Test and be able to demonstrate that the proposed arrangements are likely to lead to improvement in the standard, quality and/or range of educational provision for children with special educational needs and disabilities.

Information on the required improvements is detailed in the full SEN Improvement Test which is located online.

How to respond to the consultation

- **Please refer to the below supporting documents:**
 - SEN Improvement Test – Special School, Academies and Early Years
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If you do not have access to the internet or you would prefer a paper copy of any of the documents, please contact telephone 01274 439261 or email Localoffer@bradford.gov.uk

- **Complete the Consultation Questionnaire no later than Thursday 14th December 2017**



Online responses can be made by visiting:

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Thank you for taking the time to read this consultation document. Your views are important. Please make your views known to us by completing the Consultation questionnaire or let us have your comments.

Thank you



Appendix G

Statutory proposal for a prescribed alteration

Proposal to Increase the Number of Pupils at Chellow Heights Special School

School and Local Authority details:

School: Chellow Heights Special School, Thorn Lane, Bradford, BD9 6AL (West Site)
Chellow Heights South, Netherlands Avenue, Low Moor, BD6 1EA (South Site). This is a maintained primary special school.

Local Authority: City of Bradford Metropolitan District Council, City Hall, Bradford BD1 1HY

Description of alteration:

Chellow Heights Special School is an existing generic primary special school. It provides education to primary aged children with a range of special educational needs and disabilities. The school is based on two sites. The main site is located in the west of Bradford, with the second smaller site located in Low Moor, in the south of the district.

The proposal is to increase the number of places at the school for primary aged pupils from 200 places to 248 places across both sites. The proposed implementation date is 16 April 2018. The admission of pupils will continue to be managed by the special educational needs statutory assessment process.

Chellow Heights Special School was designated for up to 165 places and numbers on roll at the school have increased as there has been a significant increase in demand for additional places. As a result the school has operated on two sites from 2014. The numbers of pupils on the roll of the school have been consistently rising for the last 4 years.

There are currently 200 pupils on roll at the school, across the two sites;

Chellow West site – 145

Chellow South site – 55

Two separate capital building programmes are required to accommodate the proposed additional places. Current building work has already taken place on both sites to safely accommodate the increased number of pupils currently on roll at the school



Consultation:

The Local Authority consulted with all interested parties. The 4 week consultation period commenced on 16th November 2017 and closed on 14th December 2017. A summary of the responses and the outcome of the consultation is attached. (Responses to the Consultation and Outcome of the Consultation report).

Objectives:

The objective of the proposal is for the Local Authority to increase specialist provision in the Bradford District for primary aged boys and girls with special education needs and disabilities, by increasing the number of pupils at Chellow Heights Special School from 200 places for pupils currently on the school roll to 248 places for pupils across both sites.

When proposing changes to existing SEND Provision the Proposers have to meet the SEN Improvement Test and be able to demonstrate that the proposed arrangements are likely to lead to improvement in the standard, quality/and or range of educational provision for Children with special educational needs and disabilities. The rationale and expected benefits of the proposal are set out in the attached SEN Improvement Test.

The proposals will build on the good standards for teaching and learning already in place at the school and provide additional local places for local children with special educational needs without having any negative impact on other schools, academies and educational institutions in the area. This would also increase parental choice in the area.

Implementation and any proposed stages for implementation:

The proposed implementation date is 16 April 2018. The proposal would ensure a successful outcome for the school and children and young people.

Project Costs:

There are capital costs associated with the proposed increase in the number of places for pupils at Chellow Heights Special School. The Local Authority has secured and agreed the amount of capital costs for the proposed improvements and refurbishments across both sites. Current building work has already taken place on both sites to safely accommodate the increased number of pupils currently on roll at the school

All specialist places at Chellow Heights Special School will continue to be funded from the High Needs Block part of the Dedicated Schools Grant (DSG). In accordance with the Place Plus Model (the local determined funding formula for special educational needs pupils). Place funding will be delegated to the school for an agreed number of places. Additional funding will be paid in accordance with individual pupil needs (within the established 7 range model). The revenue funding required for the additional places is included in the DSG allocation and the additional commissioned places have been agreed



by the Schools Forum.

Chellow Heights Special School currently has places for 200 pupils across both sites on the school roll. The proposal is to increase the current number of places for pupils at the school to 248 places across both sites.

Evidence of demand:

The current number of pupils on the roll of the school across both sites is 200. The proposed increase in the number of places for pupils at the school will ensure that current and short term demands for SEND provision can be met in the area.

All Local Authorities have a statutory duty to keep under review the provision they make for pupils with special educational needs and disabilities (SEND). This must be based on the regular review of current and future trends (pupil profiles). In monitoring these trends, data and information it has confirmed that further specialist provision is required to meet the needs of its current and future population.

The Local Authority has undertaken a SEND Strategic Review 2016- 2020 to ensure the sufficiency of specialist places for children and young people with special educational needs and disabilities (SEND) and Behaviour.

All the available data shows that there will be an on-going need to provide specialist provision for early years, primary and secondary phase children and young people with a range of special educational needs and disabilities throughout the Bradford District.

The Bradford District has experienced a significant increase in demand for SEND provision in the last 10 years. It is projected that the demand for SEND provision will continue to grow and that in the next 3 years a minimum of 360 additional specialist places for primary and secondary aged children and young people in the Bradford District will be required.

In the last 10 years Bradford has invested significant resources to develop specialist provision within the District to avoid the need to place young people out of District enabling them remain part of their local school community. It is acknowledged that there are exceptional cases where this is not possible.

The Bradford District Education Organisation Plan takes into account different factors when predicting school demand including fertility and birth rates, housing growth and inward/outward migration. Analysis of the Index of Deprivation and population estimates from the Office for National Statistics are also taken into account.

Projections for changes between 2014 and 2018 anticipated that the Districts primary school population will increase by 4.9% and the Districts secondary school population will increase by 10.4%. This makes an overall increase of 7.1%



In January 2005 the population in the Districts Schools and Nurseries was 79,589. In January 2015 the population was 90,292 an increase of 13.4%. In January 2016 the population was 103,773.

Current hypotheses show that an increase in SEN will be 1.5 times the increase in population e.g. a 20% increase in the population represents a 30% increase in demand for specialist provision. The overall needs of the population were predicted to be 33% severe learning difficulties (SLD) 33% profound and multiple learning difficulties (PMLD) 33% on the autism spectrum (ASD).

By 2017 the population of the special schools has changed. The number of children with moderate learning difficulties has dropped significantly. The nature and complexity of the needs of the current children has increased. The number of children on the autism spectrum with other learning difficulties has increased. There have been similar increases for children with profound and multiple learning (PMLD) and physical difficulties (PD) with additional needs.

Pupils with PMLD and PD require additional floor space because of the equipment that is required to support them.

There have been a number of influencing factors in relation to the demand for special school places in the Bradford District:

- Improvements in medical interventions which has significantly increased life expectancy for those children with life limiting conditions
- The overall increase in the pupil population since 2005, particularly within the south Asian community and economically deprived areas.
- An increase in the number of referrals received for statutory assessment
- In 2013/14 the Local Authority received 350 requests for statutory assessment. In 2014/15 the Local Authority received 506 requests for statutory assessment. This represents a 47% increase. In 2015/16 the Local Authority received 666 requests for statutory assessment. Since 2013/14 this represents a 92% increase in the requests for statutory assessment. Approximately 20% of these requests resulted in a change of provision.
- An increase in the number of in-year admissions to special schools
In 2015/16 83 children and young people required a change in provision to special school. For place projection purposes it is anticipated that this number will continue at similar levels for the next three years.
- The capacity of our schools to meet the needs of children and young people with special educational needs



An 11 year analysis of the January PLASC data shows that overall the number of pupils with an education health and care plan and a primary need of severe learning difficulties is about the same overall. However there has been a change to where this group of children go to school. The proportion of children and young people who attend our mainstream schools has decreased significantly. The proportion of children and young people who attend our special schools has increased significantly. This is partly influenced by a growing number of children and young people who attend resourced provision as these provisions have been opened in recent years. This is relatively small in number overall. Another influence could be parental preference for specialist provision but these changes could also be linked to the capacity of our schools to meet a range of learning needs balancing the needs of all children and the pressure to improve standards alongside the level of resources that are delegated directly to schools.

Projections have been applied to the existing population of the District's resourced provisions and special schools. This provides an indication of the future demand for places. By 2018 this shows that additional places will be required to support children and young people with special educational needs and disabilities.

The identification of autism spectrum conditions continues to increase. More clinics have been established to enable the diagnosis of ASD earlier. Support documents from the Joint Assessment Clinic show there is likely to be an increase in demand for autism provision. Health professionals inform the Local Authority of young children with additional needs. An analysis of these notifications shows that children and young people identified with speech language and communication needs are the largest cohort of notifications received. A significant number of these are likely to receive a diagnosis of autism.

The distribution of special educational needs and disabilities is widespread across the District.

The projected population increases are applied to the current known special educational needs and disabilities population. In addition, other local data such as the Joint Strategic Needs Assessment (JSNA) is considered such as the prevalence of complex health and disability in the local district. The early identification of young children and the outcome of statutory assessments have identified an increase in numbers for some areas of need.

This provides an indication of the future demand for places. By 2018 this shows that additional places will be required to support children and young people with special educational needs.

Long term, Bradford could be successful in the opening of two new specialist free schools to meet current and future need. If successful the earliest opening date for a new free school would be September 2020. As the existing special schools are currently full the Local Authority needs to provide additional places in the meantime.

360 Generic specialist places and 40 specialist behaviour places are required over the



next 3 years. Schools Forum has agreed to fund the 400 additional places from the High Needs Block.

Future Specialist Provision

The Bradford District has experienced a significant increase in demand for Special Educational Needs and Disabilities (SEND) provision in the last 10 years.

It is projected that the demand for SEND provision will continue to grow and that in the next 3 years a minimum of 400 additional specialist places across all sectors (EYESP's, DSP's, Special Schools and Pupil Referral Units) in the Bradford District will be required. The Schools Forum has commissioned the additional places.

- There is an urgent need for more specialist places in Bradford due to the increase in population
- Currently only 1% of Bradford's Special Educational Needs and Disabilities pupils are in special schools and there is a growing need for more specialist places to meet need and demand
- All children are to be valued equally, regardless of their ability, behaviour, family circumstances, ethnic origin, gender and sexual orientation
- All children are to be provided with the best learning opportunities, environment and experience which maximises their learning
- All children are entitled to a broad, balanced and relevant curriculum which is differentiated to meet individual needs
- Children's diverse special educational needs and disabilities require a range of flexible and varied provision

These proposals will expand and develop further specialist provision to enhance the network of Special Schools, EYESP's, DSP's and PRU's which form part of:

- A coherent geographical spread of provision across the District, minimising travel times
- A dynamic network for sharing best practice and experience
- Flexible and responsive provision to best meet the needs of Children and Young People with SEND

Children and Young People with a range of Special Educational Needs and Disabilities will continue to be well served in Bradford. The council is looking at the best way to offer a full range of provision locally for all children. We believe that a flexible district wide model will be able to respond effectively to local changes in demand.



The proposed changes will ensure the continued delivery of high quality and cost effective provision for the Children and Young People of Bradford.

The Council intend to have a District wide structure of EYESP's, DSP's and PRU's that will:

- Provide local EYESP's, DSP's and PRU's, reducing the need for pupils to travel long distances across the District
- Provide an equitable distribution of EYESP's, DSP's and PRU's for children and young people with special educational needs and disabilities
- Provide increased access to the curriculum; both social and academic will be increased due to the staffing experience and capacity of the new EYESP's, DSP's and PRU's. It will be possible to individually differentiate and support the work and potential of each individual pupil
- Provide an increased level of available support to all pupils and will give the greatest opportunity to increase inclusion for EYESP, DSP and PRU pupils who are otherwise very vulnerable
- Provide an improved support network, especially related to training that will support and develop the proposals
- Extend and target multi-agency support into the new EYESP's, DSP's and PRU's especially from the health authority and more specifically speech and language therapy.
- Provide a progression pathway from Primary phase to Secondary phase.
- Create additional Early Years Enhanced Specialist places and develop further specialist provision to enhance the network of high quality Nursery Schools

Central to these proposals is that continuity of provision between early years, primary and secondary phases of education are developed.

Objections and comments:

Within four weeks of the date of publication of this proposal, i.e. by 5pm on 22nd February 2018, any person may submit comments on the proposal (in support or objections) by sending them to the SEN Planning & Project Manager, SEND Services, 5th Floor, Margaret McMillan Tower, Bradford, BD1 1NN or email SENDPlacesConsultation@bradford.gov.uk



Appendix H**Statutory proposal for a prescribed alteration****Proposal to Increase the Number of Pupils at Delius Special School****School and Local Authority details:**

School: Delius Special School, Barkerend Road, Bradford, BD3 8QX

This is a maintained primary special school.

Local Authority: City of Bradford Metropolitan District Council, City Hall, Bradford BD1 1HY

Description of alteration:

Delius Special School is an existing generic primary special school. It provides education to primary aged children with a range of special educational needs and disabilities. The proposal is to increase the number of places at the school for primary aged pupils from 124 to 148 places. The proposed implementation date is 1 September 2018. The admission of pupils will continue to be managed by the special educational needs statutory assessment process.

Delius Special School was originally designated for up to 110 places for pupils. Since the school opened numbers have gradually increased, as has the demand for specialist places and the numbers of pupils on the roll of the school has been consistently rising for the last 2 years. There are currently 124 pupils on roll at the school.

It is proposed that remodelling of the existing building would be required to enable the proposed increase the number of places at the school. The Local Authority has secured the amount of capital costs for the proposed improvements and refurbishments associated with the proposed increase in the number of places at the school.

Consultation:

The Local Authority consulted with all interested parties. The 4 week consultation period commenced on 16th November 2017 and closed on 14th December 2017. A summary of the responses and the outcome of the consultation is attached. (Responses to the Consultation and Outcome of the Consultation report).

Objectives:

The objective of the proposal is for the Local Authority to increase specialist provision in the Bradford District for primary aged boys and girls with a range of special educational needs and disabilities by increasing the number of pupils at Delius Special School from 124 places for pupils currently on the school roll to 148 places for pupils.



When proposing changes to existing SEND Provision the Proposers have to meet the SEN Improvement Test and be able to demonstrate that the proposed arrangements are likely to lead to improvement in the standard, quality/and or range of educational provision for Children with special educational needs and disabilities. The rationale and expected benefits of the proposal are set out in the attached SEN Improvement Test.

The proposals will build on the good standards for teaching and learning already in place at the school and provide additional local places for local children with special educational needs without having any negative impact on other schools, academies and educational institutions in the area. This would also increase parental choice in the area.

Implementation and any proposed stages for implementation:

The proposed implementation date is 1 September 2018. The proposal would ensure a successful outcome for the school and children and young people.

Project Costs:

The Local Authority has secured the amount of capital costs for the proposed improvements and refurbishments associated with the proposed increase in the number of pupils at the school.

All specialist places at Delius Special School will continue to be funded from the High Needs Block part of the Dedicated Schools Grant (DSG). In accordance with the Place Plus Model (the local determined funding formula for special educational needs pupils). Place funding will be delegated to the school for an agreed number of places. Additional funding will be paid in accordance with individual pupil needs (within the established 7 range model). The revenue funding required for the additional places is included in the DSG allocation and the additional commissioned places have been agreed by the Schools Forum.

Delius Special School currently has places for 124 pupils on the school roll. The proposal is to increase the current number of places for pupils at the school to 148 places.

Evidence of demand:

The current number of pupils on the roll of the school is 124. The proposed increase in the number of places for pupils at the school will ensure that current and short term demands for SEND provision can be met in the area.

All Local Authorities have a statutory duty to keep under review the provision they make for pupils with special educational needs and disabilities (SEND). This must be based on the regular review of current and future trends (pupil profiles). In monitoring these trends, data and information it has confirmed that further specialist provision is required to meet the needs of its current and future population.



The Local Authority has undertaken a SEND Strategic Review 2016- 2020 to ensure the sufficiency of specialist places for children and young people with special educational needs and disabilities (SEND) and Behaviour.

All the available data shows that there will be an on-going need to provide specialist provision for early years, primary and secondary phase children and young people with a range of special educational needs and disabilities throughout the Bradford District.

The Bradford District has experienced a significant increase in demand for SEND provision in the last 10 years. It is projected that the demand for SEND provision will continue to grow and that in the next 3 years a minimum of 360 additional specialist places for primary and secondary aged children and young people in the Bradford District will be required.

In the last 10 years Bradford has invested significant resources to develop specialist provision within the District to avoid the need to place young people out of District enabling them remain part of their local school community. It is acknowledged that there are exceptional cases where this is not possible.

The Bradford District Education Organisation Plan takes into account different factors when predicting school demand including fertility and birth rates, housing growth and inward/outward migration. Analysis of the Index of Deprivation and population estimates from the Office for National Statistics are also taken into account.

Projections for changes between 2014 and 2018 anticipated that the Districts primary school population will increase by 4.9% and the Districts secondary school population will increase by 10.4%. This makes an overall increase of 7.1%

In January 2005 the population in the Districts Schools and Nurseries was 79,589. In January 2015 the population was 90,292 an increase of 13.4%. In January 2016 the population was 103,773.

Current hypotheses show that an increase in SEN will be 1.5 times the increase in population e.g. a 20% increase in the population represents a 30% increase in demand for specialist provision. The overall needs of the population were predicted to be 33% severe learning difficulties (SLD) 33% profound and multiple learning difficulties (PMLD) 33% on the autism spectrum (ASD).

By 2017 the population of the special schools has changed. The number of children with moderate learning difficulties has dropped significantly. The nature and complexity of the needs of the current children has increased. The number of children on the autism spectrum with other learning difficulties has increased. There have been similar increases for children with profound and multiple learning (PMLD) and physical difficulties (PD) with additional needs.

Pupils with PMLD and PD require additional floor space because of the equipment that is required to support them.



There have been a number of influencing factors in relation to the demand for special school places in the Bradford District:

- Improvements in medical interventions which has significantly increased life expectancy for those children with life limiting conditions
- The overall increase in the pupil population since 2005, particularly within the south Asian community and economically deprived areas.
- An increase in the number of referrals received for statutory assessment
- In 2013/14 the Local Authority received 350 requests for statutory assessment. In 2014/15 the Local Authority received 506 requests for statutory assessment. This represents a 47% increase. In 2015/16 the Local Authority received 666 requests for statutory assessment. Since 2013/14 this represents a 92% increase in the requests for statutory assessment. Approximately 20% of these requests resulted in a change of provision.
- An increase in the number of in-year admissions to special schools
In 2015/16 83 children and young people required a change in provision to special school. For place projection purposes it is anticipated that this number will continue at similar levels for the next three years.
- The capacity of our schools to meet the needs of children and young people with special educational needs

An 11 year analysis of the January PLASC data shows that overall the number of pupils with an education health and care plan and a primary need of severe learning difficulties is about the same overall. However there has been a change to where this group of children go to school. The proportion of children and young people who attend our mainstream schools has decreased significantly. The proportion of children and young people who attend our special schools has increased significantly. This is partly influenced by a growing number of children and young people who attend resourced provision as these provisions have been opened in recent years. This is relatively small in number overall. Another influence could be parental preference for specialist provision but these changes could also be linked to the capacity of our schools to meet a range of learning needs balancing the needs of all children and the pressure to improve standards alongside the level of resources that are delegated directly to schools.

Projections have been applied to the existing population of the District's resourced provisions and special schools. This provides an indication of the future demand for places. By 2018 this shows that additional places will be required to support children and young people with special educational needs and disabilities.

The identification of autism spectrum conditions continues to increase. More clinics have



been established to enable the diagnosis of ASD earlier. Support documents from the Joint Assessment Clinic show there is likely to be an increase in demand for autism provision. Health professionals inform the Local Authority of young children with additional needs. An analysis of these notifications shows that children and young people identified with speech language and communication needs are the largest cohort of notifications received. A significant number of these are likely to receive a diagnosis of autism.

The distribution of special educational needs and disabilities is widespread across the District.

The projected population increases are applied to the current known special educational needs and disabilities population. In addition, other local data such as the Joint Strategic Needs Assessment (JSNA) is considered such as the prevalence of complex health and disability in the local district. The early identification of young children and the outcome of statutory assessments have identified an increase in numbers for some areas of need.

This provides an indication of the future demand for places. By 2018 this shows that additional places will be required to support children and young people with special educational needs.

Long term, Bradford could be successful in the opening of two new specialist free schools to meet current and future need. If successful the earliest opening date for a new free school would be September 2020. As the existing special schools are currently full the Local Authority needs to provide additional places in the meantime.

360 Generic specialist places and 40 specialist behaviour places are required over the next 3 years. Schools Forum has agreed to fund the 400 additional places from the High Needs Block.

Future Specialist Provision

The Bradford District has experienced a significant increase in demand for Special Educational Needs and Disabilities (SEND) provision in the last 10 years.

It is projected that the demand for SEND provision will continue to grow and that in the next 3 years a minimum of 400 additional specialist places across all sectors (EYESP's, DSP's, Special Schools and Pupil Referral Units) in the Bradford District will be required. The School Forum has commissioned the additional places.

- There is an urgent need for more specialist places in Bradford due to the increase in population
- Currently only 1% of Bradford's Special Educational Needs and Disabilities pupils are in special schools and there is a growing need for more specialist places to meet need and demand



- All children are to be valued equally, regardless of their ability, behaviour, family circumstances, ethnic origin, gender and sexual orientation
- All children are to be provided with the best learning opportunities, environment and experience which maximises their learning
- All children are entitled to a broad, balanced and relevant curriculum which is differentiated to meet individual needs
- Children's diverse special educational needs and disabilities require a range of flexible and varied provision

These proposals will expand and develop further specialist provision to enhance the network of Special Schools, EYESP's, DSP's and PRU's which form part of:

- A coherent geographical spread of provision across the District, minimising travel times
- A dynamic network for sharing best practice and experience
- Flexible and responsive provision to best meet the needs of Children and Young People with SEND

Children and Young People with a range of Special Educational Needs and Disabilities will continue to be well served in Bradford. The council is looking at the best way to offer a full range of provision locally for all children. We believe that a flexible district wide model will be able to respond effectively to local changes in demand.

The proposed changes will ensure the continued delivery of high quality and cost effective provision for the Children and Young People of Bradford.

The Council intend to have a District wide structure of EYESP's, DSP's and PRU's that will:

- Provide local EYESP's, DSP's and PRU's, reducing the need for pupils to travel long distances across the District
- Provide an equitable distribution of EYESP's, DSP's and PRU's for children and young people with special educational needs and disabilities
- Provide increased access to the curriculum; both social and academic will be increased due to the staffing experience and capacity of the new EYESP's, DSP's and PRU's. It will be possible to individually differentiate and support the work and potential of each individual pupil
- Provide an increased level of available support to all pupils and will give the greatest opportunity to increase inclusion for EYESP, DSP and PRU pupils who are otherwise very vulnerable
- Provide an improved support network, especially related to training that will support and develop the proposals
- Extend and target multi-agency support into the new EYESP's, DSP's and PRU's especially from the health authority and more specifically speech and language therapy.



- Provide a progression pathway from Primary phase to Secondary phase.
- Create additional Early Years Enhanced Specialist places and develop further specialist provision to enhance the network of high quality Nursery Schools

Central to these proposals is that continuity of provision between early years, primary and secondary phases of education are developed.

Objections and comments:

Within four weeks of the date of publication of this proposal, i.e. by 5pm on 22nd February 2018, any person may submit comments on the proposal (in support or objections) by sending them to the SEN Planning & Project Manager, SEND Services, 5th Floor, Margaret McMillan Tower, Bradford, BD1 1NN or email SENDPlacesConsultation@bradford.gov.uk



Appendix I**Statutory Proposal for a Prescribed Alteration****Proposal to Increase the Number of Pupils at Beechcliffe Special School****School and Local Authority details:**

School: Beechcliffe Special School, Greenhead Road, Keighley, Bradford, BD20 6ED

This is a maintained secondary special school.

Local Authority: City of Bradford Metropolitan District Council, City Hall, Bradford BD1 1HY

Description of alteration:

Beechcliffe Special School is an existing generic secondary special school. It provides education to secondary aged children with a range of special educational needs and disabilities. The proposal is to increase the number of places at the school for secondary aged pupils from 114 to 144 places. The proposed implementation date is 16 April 2018. The admission of pupils will continue to be managed by the special educational needs statutory assessment process.

Beechcliffe Special School was originally designated for up to 100 places for pupils. Since the school opened numbers have gradually increased, as has the demand for specialist places and the numbers of pupils on the roll of the school has been consistently rising over the last 2 years. There are currently 114 pupils on roll at the school.

It is proposed that remodelling of the existing building, in conjunction with using additional classroom space at University Academy Keighley would be required to enable the proposed increase in the number of places at the school. The Local Authority has secured the amount of capital costs for the proposed improvements and refurbishments associated with the proposed increase in the number of places

Consultation:

The Local Authority consulted with all interested parties. The 4 week consultation period commenced on 16th November 2017 and closed on 14th December 2017. A summary of the responses and the outcome of the consultation is attached. (Responses to the Consultation and Outcome of the Consultation report).



Objectives:

The objective of the proposal is for the Local Authority to increase specialist provision in the Bradford District for secondary aged boys and girls with a range of special educational needs and disabilities by increasing the number of pupils at Beechcliffe Special School from 114 places for pupils currently on the roll to 144 places for pupils.

When proposing changes to existing SEND Provision the Proposers have to meet the SEN Improvement Test and be able to demonstrate that the proposed arrangements are likely to lead to improvement in the standard, quality/and or range of educational provision for Children with special educational needs and disabilities. The rationale and expected benefits of the proposal are set out in the attached SEN Improvement Test.

The proposals will build on the good standards for teaching and learning already in place at the school and provide additional local places for local children with special educational needs without having any negative impact on other schools, academies and educational institutions in the area. This would also increase parental choice in the area.

Implementation and any proposed stages for implementation:

The proposed implementation date is 16 April 2018. The proposal would ensure a successful outcome for the school and children and young people.

Project Costs:

The Local Authority has secured the amount of capital costs for the proposed improvements and refurbishments associated with the proposed increase in the number of pupils at the school.

All specialist places at Beechcliffe Special School will continue to be funded from the High Needs Block part of the Dedicated Schools Grant (DSG). In accordance with the Place Plus Model (the local determined funding formula for special educational needs pupils). Place funding will be delegated to the school for an agreed number of places. Additional funding will be paid in accordance with individual pupil needs (within the established 7 range model). The revenue funding required for the additional places is included in the DSG allocation and the additional commissioned places have been agreed by the Schools Forum.

Beechcliffe Special School currently has places for 114 pupils on roll. The proposal is to increase the current number of places for pupils at the school to 144.



Evidence of demand:

The current number of pupils on the roll of the school is 114. The proposed increase in the number of places for pupils at the school will ensure that current and short term demands for SEND provision can be met in the area.

All Local Authorities have a statutory duty to keep under review the provision they make for pupils with special educational needs and disabilities (SEND). This must be based on the regular review of current and future trends (pupil profiles). In monitoring these trends, data and information it has confirmed that further specialist provision is required to meet the needs of its current and future population.

The Local Authority has undertaken a SEND Strategic Review 2016- 2020 to ensure the sufficiency of specialist places for children and young people with special educational needs and disabilities (SEND) and Behaviour.

All the available data shows that there will be an on-going need to provide specialist provision for early years, primary and secondary phase children and young people with a range of special educational needs and disabilities throughout the Bradford District.

The Bradford District has experienced a significant increase in demand for SEND provision in the last 10 years. It is projected that the demand for SEND provision will continue to grow and that in the next 3 years a minimum of 360 additional specialist places for primary and secondary aged children and young people in the Bradford District will be required.

In the last 10 years Bradford has invested significant resources to develop specialist provision within the District to avoid the need to place young people out of District enabling them remain part of their local school community. It is acknowledged that there are exceptional cases where this is not possible.

The Bradford District Education Organisation Plan takes into account different factors when predicting school demand including fertility and birth rates, housing growth and inward/outward migration. Analysis of the Index of Deprivation and population estimates from the Office for National Statistics are also taken into account.

Projections for changes between 2014 and 2018 anticipated that the Districts primary school population will increase by 4.9% and the Districts secondary school population will increase by 10.4%. This makes an overall increase of 7.1%

In January 2005 the population in the Districts Schools and Nurseries was 79,589. In January 2015 the population was 90,292 an increase of 13.4%. In January 2016 the population was 103,773.

Current hypotheses show that an increase in SEN will be 1.5 times the increase in population e.g. a 20% increase in the population represents a 30% increase in demand for specialist provision.



The overall needs of the population were predicted to be 33% severe learning difficulties (SLD) 33% profound and multiple learning difficulties (PMLD) 33% on the autism spectrum (ASD).

By 2017 the population of the special schools has changed. The number of children with moderate learning difficulties has dropped significantly. The nature and complexity of the needs of the current children has increased. The number of children on the autism spectrum with other learning difficulties has increased. There have been similar increases for children with profound and multiple learning (PMLD) and physical difficulties (PD) with additional needs.

Pupils with PMLD and PD require additional floor space because of the equipment that is required to support them.

There have been a number of influencing factors in relation to the demand for special school places in the Bradford District:

- Improvements in medical interventions which has significantly increased life expectancy for those children with life limiting conditions
- The overall increase in the pupil population since 2005, particularly within the south Asian community and economically deprived areas.
- An increase in the number of referrals received for statutory assessment
- In 2013/14 the Local Authority received 350 requests for statutory assessment. In 2014/15 the Local Authority received 506 requests for statutory assessment. This represents a 47% increase. In 2015/16 the Local Authority received 666 requests for statutory assessment. Since 2013/14 this represents a 92% increase in the requests for statutory assessment. Approximately 20% of these requests resulted in a change of provision.
- An increase in the number of in-year admissions to special schools
In 2015/16 83 children and young people required a change in provision to special school. For place projection purposes it is anticipated that this number will continue at similar levels for the next three years.
- The capacity of our schools to meet the needs of children and young people with special educational needs

An 11 year analysis of the January PLASC data shows that overall the number of pupils with an education health and care plan and a primary need of severe learning difficulties is about the same overall. However there has been a change to where this group of children go to school. The proportion of children and young people who attend our mainstream schools has decreased significantly. The proportion of children and young people who attend our special schools has increased significantly. This is partly influenced by a growing number of children and young people who attend resourced provision as these



provisions have been opened in recent years. This is relatively small in number overall. Another influence could be parental preference for specialist provision but these changes could also be linked to the capacity of our schools to meet a range of learning needs balancing the needs of all children and the pressure to improve standards alongside the level of resources that are delegated directly to schools.

Projections have been applied to the existing population of the District's resourced provisions and special schools. This provides an indication of the future demand for places. By 2018 this shows that additional places will be required to support children and young people with special educational needs and disabilities.

The identification of autism spectrum conditions continues to increase. More clinics have been established to enable the diagnosis of ASD earlier. Support documents from the Joint Assessment Clinic show there is likely to be an increase in demand for autism provision. Health professionals inform the Local Authority of young children with additional needs. An analysis of these notifications shows that children and young people identified with speech language and communication needs are the largest cohort of notifications received. A significant number of these are likely to receive a diagnosis of autism.

The distribution of special educational needs and disabilities is widespread across the District.

The projected population increases are applied to the current known special educational needs and disabilities population. In addition, other local data such as the Joint Strategic Needs Assessment (JSNA) is considered such as the prevalence of complex health and disability in the local district. The early identification of young children and the outcome of statutory assessments have identified an increase in numbers for some areas of need.

This provides an indication of the future demand for places. By 2018 this shows that additional places will be required to support children and young people with special educational needs.

Long term, Bradford could be successful in the opening of two new specialist free schools to meet current and future need. If successful the earliest opening date for a new free school would be September 2020. As the existing special schools are currently full the Local Authority needs to provide additional places in the meantime.

360 Generic specialist places and 40 specialist behaviour places are required over the next 3 years. Schools Forum has agreed to fund the 400 additional places from the High Needs Block.

Future Specialist Provision

The Bradford District has experienced a significant increase in demand for Special Educational Needs and Disabilities (SEND) provision in the last 10 years.



It is projected that the demand for SEND provision will continue to grow and that in the next 3 years a minimum of 400 additional specialist places across all sectors (EYESP's, DSP's, Special Schools and Pupil Referral Units) in the Bradford District will be required. The School Forum has commissioned the additional places.

- There is an urgent need for more specialist places in Bradford due to the increase in population
- Currently only 1% of Bradford's Special Educational Needs and Disabilities pupils are in special schools and there is a growing need for more specialist places to meet need and demand
- All children are to be valued equally, regardless of their ability, behaviour, family circumstances, ethnic origin, gender and sexual orientation
- All children are to be provided with the best learning opportunities, environment and experience which maximises their learning
- All children are entitled to a broad, balanced and relevant curriculum which is differentiated to meet individual needs
- Children's diverse special educational needs and disabilities require a range of flexible and varied provision

These proposals will expand and develop further specialist provision to enhance the network of Special Schools, EYESP's, DSP's and PRU's which form part of:

- A coherent geographical spread of provision across the District, minimising travel times
- A dynamic network for sharing best practice and experience
- Flexible and responsive provision to best meet the needs of Children and Young People with SEND

Children and Young People with a range of Special Educational Needs and Disabilities will continue to be well served in Bradford. The council is looking at the best way to offer a full range of provision locally for all children. We believe that a flexible district wide model will be able to respond effectively to local changes in demand.

The proposed changes will ensure the continued delivery of high quality and cost effective provision for the Children and Young People of Bradford.

The Council intend to have a District wide structure of EYESP's, DSP's and PRU's that will:

- Provide local EYESP's, DSP's and PRU's, reducing the need for pupils to travel long distances across the District
- Provide an equitable distribution of EYESP's, DSP's and PRU's for children and young people with special educational needs and disabilities



- Provide increased access to the curriculum; both social and academic will be increased due to the staffing experience and capacity of the new EYESP's, DSP's and PRU's. It will be possible to individually differentiate and support the work and potential of each individual pupil
- Provide an increased level of available support to all pupils and will give the greatest opportunity to increase inclusion for EYESP, DSP and PRU pupils who are otherwise very vulnerable
- Provide an improved support network, especially related to training that will support and develop the proposals
- Extend and target multi-agency support into the new EYESP's, DSP's and PRU's especially from the health authority and more specifically speech and language therapy.
- Provide a progression pathway from Primary phase to Secondary phase.
- Create additional Early Years Enhanced Specialist places and develop further specialist provision to enhance the network of high quality Nursery Schools

Central to these proposals is that continuity of provision between early years, primary and secondary phases of education are developed.

Objections and comments:

Within four weeks of the date of publication of this proposal, i.e. by 5pm on 22nd February 2018, any person may submit comments on the proposal (in support or objections) by sending them to the SEN Planning & Project Manager, SEND Services, 5th Floor, Margaret McMillan Tower, Bradford, BD1 1NN or email SENDPlacesConsultation@bradford.gov.uk



Appendix J**Statutory proposal for a prescribed alteration****Proposal to Increase the Number of Pupils at Oastlers School****School and Local Authority details:**

School: Oastlers School, Flockton Road, Bradford, West Yorkshire, BD4 7RH. This is a maintained secondary special school.

Local Authority: City of Bradford Metropolitan District Council, City Hall, Bradford BD1 1HY

Description of alteration:

Oastlers School is an existing secondary special school. It provides education to secondary aged children with social, emotional and mental health needs, including behavioural needs. The proposal is to increase the number of secondary aged pupils from 80 to 94 places. The proposed implementation date is 16 April 2018. The admission of pupils will continue to be managed by the special educational needs statutory assessment process.

Oastlers School was originally designated for up to 80 places for pupils. Since the school opened in 2013 numbers have gradually increased and the numbers of pupils on the roll of the school has been rising for the last 2 years. There are currently 86 pupils on roll at the school.

No new or additional site is required for this proposed change. No remodelling of existing buildings would be required.

Consultation:

The Local Authority consulted with all interested parties. The 4 week consultation period commenced on 16th November 2017 and closed on 14th December 2017. A summary of the responses and the outcome of the consultation is attached. (Responses to the Consultation and Outcome of the Consultation report).

Objectives:

The objective of the proposal is for the Local Authority to increase specialist provision in the Bradford District for secondary aged boys and girls with social, emotional and mental health needs, including behaviour needs, by increasing the number of pupils at Oastlers School from 80 to 94 places for pupils.



When proposing changes to existing SEND Provision the Proposers have to meet the SEN Improvement Test and be able to demonstrate that the proposed arrangements are likely to lead to improvement in the standard, quality/and or range of educational provision for Children with special educational needs and disabilities. The rationale and expected benefits of the proposal are set out in the attached SEN Improvement Test

The proposals will build on the good standards for teaching and learning already in place at the school and provide additional local places for local children with special educational needs without having any negative impact on other schools, academies and educational institutions in the area. This would also increase parental choice in the area.

Implementation and any proposed stages for implementation:

The proposed implementation date is 16 April 2018. The proposal would ensure a successful outcome for the school and children and young people.

Project Costs:

There are no capital costs associated with the proposed increase in the number of places for pupils at the school.

All specialist places at Oastlers School will continue to be funded from the High Needs Block part of the Dedicated Schools Grant (DSG). In accordance with the Place Plus Model (the local determined funding formula for special educational needs pupils). Place funding will be delegated to the school for an agreed number of places. Additional funding will be paid in accordance with individual pupil needs (within the established 7 range model). The revenue funding required for the additional places is included in the DSG allocation and the additional commissioned places have been agreed by the Schools Forum.

The proposal is to increase the current number of places for pupils at the school from 80 to 94 places. Oastlers School currently has 86 pupils on the school roll

Evidence of demand:

The current number of pupils on the roll of the school is 86. The proposed increase in the number of places for pupils at the school will ensure that current and short term demands for SEND provision can be met.

All Local Authorities have a statutory duty to keep under review the provision they make for pupils with special educational needs and disabilities (SEND). This must be based on the regular review of current and future trends (pupil profiles). In monitoring these trends, data and information it has confirmed that further specialist provision is required to meet the needs of its current and future population.



The Local Authority has undertaken a SEND Strategic Review 2016- 2020 to ensure the sufficiency of specialist places for children and young people with special educational needs and disabilities (SEND) and Behaviour.

All the available data shows that there will be an on-going need to provide specialist provision for early years, primary and secondary phase children and young people with a range of special educational needs and disabilities throughout the Bradford District.

The Bradford District has experienced a significant increase in demand for SEND provision in the last 10 years. It is projected that the demand for SEND provision will continue to grow and that in the next 3 years a minimum of 360 additional specialist places for primary and secondary aged children and young people in the Bradford District will be required.

In the last 10 years Bradford has invested significant resources to develop specialist provision within the District to avoid the need to place young people out of District enabling them remain part of their local school community. It is acknowledged that there are exceptional cases where this is not possible.

The Bradford District Education Organisation Plan takes into account different factors when predicting school demand including fertility and birth rates, housing growth and inward/outward migration. Analysis of the Index of Deprivation and population estimates from the Office for National Statistics are also taken into account.

Projections for changes between 2014 and 2018 anticipated that the Districts primary school population will increase by 4.9% and the Districts secondary school population will increase by 10.4%. This makes an overall increase of 7.1%

In January 2005 the population in the Districts Schools and Nurseries was 79,589. In January 2015 the population was 90,292 an increase of 13.4%. In January 2016 the population was 103,773.

Current hypotheses show that an increase in SEN will be 1.5 times the increase in population e.g. a 20% increase in the population represents a 30% increase in demand for specialist provision. The overall needs of the population were predicted to be 33% severe learning difficulties (SLD) 33% profound and multiple learning difficulties (PMLD) 33% on the autism spectrum (ASD).

By 2017 the population of the special schools has changed. The number of children with moderate learning difficulties has dropped significantly. The nature and complexity of the needs of the current children has increased. The number of children on the autism spectrum with other learning difficulties has increased. There have been similar increases for children with profound and multiple learning (PMLD) and physical difficulties (PD) with additional needs.

Pupils with PMLD and PD require additional floor space because of the equipment that is required to support them.



There have been a number of influencing factors in relation to the demand for special school places in the Bradford District:

- Improvements in medical interventions which has significantly increased life expectancy for those children with life limiting conditions
- The overall increase in the pupil population since 2005, particularly within the south Asian community and economically deprived areas.
- An increase in the number of referrals received for statutory assessment
- In 2013/14 the Local Authority received 350 requests for statutory assessment. In 2014/15 the Local Authority received 506 requests for statutory assessment. This represents a 47% increase. In 2015/16 the Local Authority received 666 requests for statutory assessment. Since 2013/14 this represents a 92% increase in the requests for statutory assessment. Approximately 20% of these requests resulted in a change of provision.
- An increase in the number of in-year admissions to special schools
In 2015/16 83 children and young people required a change in provision to special school. For place projection purposes it is anticipated that this number will continue at similar levels for the next three years.
- The capacity of our schools to meet the needs of children and young people with special educational needs

An 11 year analysis of the January PLASC data shows that overall the number of pupils with an education health and care plan and a primary need of severe learning difficulties is about the same overall. However there has been a change to where this group of children go to school. The proportion of children and young people who attend our mainstream schools has decreased significantly. The proportion of children and young people who attend our special schools has increased significantly. This is partly influenced by a growing number of children and young people who attend resourced provision as these provisions have been opened in recent years. This is relatively small in number overall. Another influence could be parental preference for specialist provision but these changes could also be linked to the capacity of our schools to meet a range of learning needs balancing the needs of all children and the pressure to improve standards alongside the level of resources that are delegated directly to schools.

Projections have been applied to the existing population of the District's resourced provisions and special schools. This provides an indication of the future demand for places. By 2018 this shows that additional places will be required to support children and young people with special educational needs and disabilities.

The identification of autism spectrum conditions continues to increase. More clinics have



been established to enable the diagnosis of ASD earlier. Support documents from the Joint Assessment Clinic show there is likely to be an increase in demand for autism provision. Health professionals inform the Local Authority of young children with additional needs. An analysis of these notifications shows that children and young people identified with speech language and communication needs are the largest cohort of notifications received. A significant number of these are likely to receive a diagnosis of autism.

The distribution of special educational needs and disabilities is widespread across the District.

The projected population increases are applied to the current known special educational needs and disabilities population. In addition, other local data such as the Joint Strategic Needs Assessment (JSNA) is considered such as the prevalence of complex health and disability in the local district. The early identification of young children and the outcome of statutory assessments have identified an increase in numbers for some areas of need.

This provides an indication of the future demand for places. By 2018 this shows that additional places will be required to support children and young people with special educational needs.

Long term, Bradford could be successful in the opening of two new specialist free schools to meet current and future need. If successful the earliest opening date for a new free school would be September 2020. As the existing special schools are currently full the Local Authority needs to provide additional places in the meantime.

360 Generic specialist places and 40 specialist behaviour places are required over the next 3 years. Schools Forum has agreed to fund the 400 additional places from the High Needs Block.

Future Specialist Provision

The Bradford District has experienced a significant increase in demand for Special Educational Needs and Disabilities (SEND) provision in the last 10 years.

It is projected that the demand for SEND provision will continue to grow and that in the next 3 years a minimum of 400 additional specialist places across all sectors (EYESP's, DSP's, Special Schools and Pupil Referral Units) in the Bradford District will be required. The School Forum has commissioned the additional places.

- There is an urgent need for more specialist places in Bradford due to the increase in population
- Currently only 1% of Bradford's Special Educational Needs and Disabilities pupils are in special schools and there is a growing need for more specialist places to meet need and demand



- All children are to be valued equally, regardless of their ability, behaviour, family circumstances, ethnic origin, gender and sexual orientation
- All children are to be provided with the best learning opportunities, environment and experience which maximises their learning
- All children are entitled to a broad, balanced and relevant curriculum which is differentiated to meet individual needs
- Children's diverse special educational needs and disabilities require a range of flexible and varied provision

These proposals will expand and develop further specialist provision to enhance the network of Special Schools, EYESP's, DSP's and PRU's which form part of:

- A coherent geographical spread of provision across the District, minimising travel times
- A dynamic network for sharing best practice and experience
- Flexible and responsive provision to best meet the needs of Children and Young People with SEND

Children and Young People with a range of Special Educational Needs and Disabilities will continue to be well served in Bradford. The council is looking at the best way to offer a full range of provision locally for all children. We believe that a flexible district wide model will be able to respond effectively to local changes in demand.

The proposed changes will ensure the continued delivery of high quality and cost effective provision for the Children and Young People of Bradford.

The Council intend to have a District wide structure of EYESP's, DSP's and PRU's that will:

- Provide local EYESP's, DSP's and PRU's, reducing the need for pupils to travel long distances across the District
- Provide an equitable distribution of EYESP's, DSP's and PRU's for children and young people with special educational needs and disabilities
- Provide increased access to the curriculum; both social and academic will be increased due to the staffing experience and capacity of the new EYESP's, DSP's and PRU's. It will be possible to individually differentiate and support the work and potential of each individual pupil
- Provide an increased level of available support to all pupils and will give the greatest opportunity to increase inclusion for EYESP, DSP and PRU pupils who are otherwise very vulnerable
- Provide an improved support network, especially related to training that will support and develop the proposals
- Extend and target multi-agency support into the new EYESP's, DSP's and PRU's especially from the health authority and more specifically speech and language therapy.



- Provide a progression pathway from Primary phase to Secondary phase.
- Create additional Early Years Enhanced Specialist places and develop further specialist provision to enhance the network of high quality Nursery Schools

Central to these proposals is that continuity of provision between early years, primary and secondary phases of education are developed.

Objections and comments:

Within four weeks of the date of publication of this proposal, i.e. by 5pm on 22nd February 2018, any person may submit comments on the proposal (in support or objections) by sending them to the SEN Planning & Project Manager, SEND Services, 5th Floor, Margaret McMillan Tower, Bradford, BD1 1NN or email SENDPlacesConsultation@bradford.gov.uk



Appendix K**Statutory Proposal for a Prescribed Alteration****Proposal to Establish a Designated Specialist Provision (DSP) at Crossley Hall Primary School****School and Local Authority details:**

School: Crossley Hall Primary School, Thornton Road, Bradford, BD8 0HJ

This is a maintained primary school.

Local Authority: City of Bradford Metropolitan District Council, City Hall, Bradford BD1 1HY

Description of alteration:

The proposal is to establish Designated Specialist Provision (DSP) at Crossley Hall Primary School with up to 12 places for primary aged boys and girls with communication and interactions needs including autistic spectrum conditions (ASC). The proposed implementation date is 1 September 2018. The proposed provision is recognised by the Local Authority as reserved for children with special educational needs.

The admission of pupils will be managed by the special educational needs statutory assessment process. It is anticipated that the provision will grow over time.

No new or additional site is required but some remodelling of existing buildings may be required. This would be phased in agreement with the school and Local Authority.

Consultation:

The Local Authority consulted with all interested parties. The 4 week consultation period commenced on 16th November 2017 and closed on 14th December 2017. A summary of the responses and the outcome of the consultation is attached. (Responses to the Consultation and Outcome of the Consultation report).

Objectives:

The objective of the proposal is to establish a DSP at Crossley Hall Primary School with up to 12 places for primary aged boys and girls with communication and interactions needs including autistic spectrum conditions (ASC) to accommodate the increasing demand for specialist provision places across the District.



When proposing changes to existing SEND Provision the Proposers have to meet the SEN Improvement Test and be able to demonstrate that the proposed arrangements are likely to lead to improvement in the standard, quality/and or range of educational provision for Children with special educational needs and disabilities. The rationale and expected benefits of the proposal are set out in the attached SEN Improvement Test.

The proposals will build on the good standards for teaching and learning already in place at the school and provide additional local places for local children with special educational needs without having any negative impact on other schools, academies and educational institutions in the area. This would also increase parental choice in the area.

Implementation and any proposed stages for implementation:

The proposed implementation date is 1 September 2018. The admission of pupils will be managed by the special educational needs statutory assessment process. It is anticipated that the provision will grow over time. The proposal would ensure a successful outcome for the school and children and young people.

Project Costs:

No new or additional site is required at this time, but some remodelling of existing buildings may be required. This would be phased in agreement with the school and Local Authority.

The proposed Designated Specialist Provision places at Crossley Hall Primary School will be funded from the High Needs Block part of the Dedicated Schools Grant (DSG). In accordance with the Place Plus Model (the local determined funding formula for special educational needs pupils). Place funding will be delegated to the school for an agreed number of places. Additional funding will be paid in accordance with individual pupil needs (within the established 7 range model). The revenue funding for all DSPs is included in the High Needs Block allocation and the additional commissioned places have been agreed by the Schools Forum.

The Local Authority maintains a Service Level Agreement with each of the schools/academies who host a DSP.

Evidence of demand:

All Local Authorities have a statutory duty to keep under review the provision they make for pupils with special educational needs and disabilities (SEND). This must be based on the regular review of current and future trends (pupil profiles). In monitoring these trends, data and information it has confirmed that further specialist provision is required to meet the needs of its current and future population.

The Local Authority has undertaken a SEND Strategic Review 2016- 2020 to ensure the



sufficiency of specialist places for children and young people with special educational needs and disabilities (SEND) and Behaviour.

All the available data shows that there will be an on-going need to provide specialist provision for early years, primary and secondary phase children and young people with a range of special educational needs and disabilities throughout the Bradford District.

The Bradford District has experienced a significant increase in demand for SEND provision in the last 10 years. It is projected that the demand for SEND provision will continue to grow and that in the next 3 years a minimum of 360 additional specialist places for primary and secondary aged children and young people in the Bradford District will be required.

In the last 10 years Bradford has invested significant resources to develop specialist provision within the District to avoid the need to place young people out of District enabling them remain part of their local school community. It is acknowledged that there are exceptional cases where this is not possible.

The Bradford District Education Organisation Plan takes into account different factors when predicting school demand including fertility and birth rates, housing growth and inward/outward migration. Analysis of the Index of Deprivation and population estimates from the Office for National Statistics are also taken into account.

Projections for changes between 2014 and 2018 anticipated that the Districts primary school population will increase by 4.9% and the Districts secondary school population will increase by 10.4%. This makes an overall increase of 7.1%

In January 2005 the population in the Districts Schools and Nurseries was 79,589. In January 2015 the population was 90,292 an increase of 13.4%. In January 2016 the population was 103,773.

Current hypotheses show that an increase in SEN will be 1.5 times the increase in population e.g. a 20% increase in the population represents a 30% increase in demand for specialist provision. The overall needs of the population were predicted to be 33% severe learning difficulties (SLD) 33% profound and multiple learning difficulties (PMLD) 33% on the autism spectrum (ASD).

By 2017 the population of the special schools has changed. The number of children with moderate learning difficulties has dropped significantly. The nature and complexity of the needs of the current children has increased. The number of children on the autism spectrum with other learning difficulties has increased. There have been similar increases for children with profound and multiple learning (PMLD) and physical difficulties (PD) with additional needs.

Pupils with PMLD and PD require additional floor space because of the equipment that is required to support them.

There have been a number of influencing factors in relation to the demand for special school



places in the Bradford District:

- Improvements in medical interventions which has significantly increased life expectancy for those children with life limiting conditions
- The overall increase in the pupil population since 2005, particularly within the south Asian community and economically deprived areas.
- An increase in the number of referrals received for statutory assessment
- In 2013/14 the Local Authority received 350 requests for statutory assessment. In 2014/15 the Local Authority received 506 requests for statutory assessment. This represents a 47% increase. In 2015/16 the Local Authority received 666 requests for statutory assessment. Since 2013/14 this represents a 92% increase in the requests for statutory assessment. Approximately 20% of these requests resulted in a change of provision.
- An increase in the number of in-year admissions to special schools
In 2015/16 83 children and young people required a change in provision to special school. For place projection purposes it is anticipated that this number will continue at similar levels for the next three years.
- The capacity of our schools to meet the needs of children and young people with special educational needs

An 11 year analysis of the January PLASC data shows that overall the number of pupils with an education health and care plan and a primary need of severe learning difficulties is about the same overall. However there has been a change to where this group of children go to school. The proportion of children and young people who attend our mainstream schools has decreased significantly. The proportion of children and young people who attend our special schools has increased significantly. This is partly influenced by a growing number of children and young people who attend resourced provision as these provisions have been opened in recent years. This is relatively small in number overall. Another influence could be parental preference for specialist provision but these changes could also be linked to the capacity of our schools to meet a range of learning needs balancing the needs of all children and the pressure to improve standards alongside the level of resources that are delegated directly to schools.

Projections have been applied to the existing population of the District's resourced provisions and special schools. This provides an indication of the future demand for places. By 2018 this shows that additional places will be required to support children and young people with special educational needs and disabilities.

The identification of autism spectrum conditions continues to increase. More clinics have been established to enable the diagnosis of ASD earlier. Support documents from the



Joint Assessment Clinic show there is likely to be an increase in demand for autism provision. Health professionals inform the Local Authority of young children with additional needs. An analysis of these notifications shows that children and young people identified with speech language and communication needs are the largest cohort of notifications received. A significant number of these are likely to receive a diagnosis of autism.

The distribution of special educational needs and disabilities is widespread across the District.

The projected population increases are applied to the current known special educational needs and disabilities population. In addition, other local data such as the Joint Strategic Needs Assessment (JSNA) is considered such as the prevalence of complex health and disability in the local district. The early identification of young children and the outcome of statutory assessments have identified an increase in numbers for some areas of need.

This provides an indication of the future demand for places. By 2018 this shows that additional places will be required to support children and young people with special educational needs.

Long term, Bradford could be successful in the opening of two new specialist free schools to meet current and future need. If successful the earliest opening date for a new free school would be September 2020. As the existing special schools are currently full the Local Authority needs to provide additional places in the meantime.

360 Generic specialist places and 40 specialist behaviour places are required over the next 3 years. Schools Forum has agreed to fund the 400 additional places from the High Needs Block.

Future Specialist Provision

The Bradford District has experienced a significant increase in demand for Special Educational Needs and Disabilities (SEND) provision in the last 10 years.

It is projected that the demand for SEND provision will continue to grow and that in the next 3 years a minimum of 400 additional specialist places across all sectors (EYESP's, DSP's, Special Schools and Pupil Referral Units) in the Bradford District will be required. The School Forum has commissioned the additional places.

- There is an urgent need for more specialist places in Bradford due to the increase in population
- Currently only 1% of Bradford's Special Educational Needs and Disabilities pupils are in special schools and there is a growing need for more specialist places to meet need and demand
- All children are to be valued equally, regardless of their ability, behaviour, family circumstances, ethnic origin, gender and sexual orientation



- All children are to be provided with the best learning opportunities, environment and experience which maximises their learning
- All children are entitled to a broad, balanced and relevant curriculum which is differentiated to meet individual needs
- Children's diverse special educational needs and disabilities require a range of flexible and varied provision

These proposals will expand and develop further specialist provision to enhance the network of Special Schools, EYESP's, DSP's and PRU's which form part of:

- A coherent geographical spread of provision across the District, minimising travel times
- A dynamic network for sharing best practice and experience
- Flexible and responsive provision to best meet the needs of Children and Young People with SEND

Children and Young People with a range of Special Educational Needs and Disabilities will continue to be well served in Bradford. The council is looking at the best way to offer a full range of provision locally for all children. We believe that a flexible district wide model will be able to respond effectively to local changes in demand.

The proposed changes will ensure the continued delivery of high quality and cost effective provision for the Children and Young People of Bradford.

The Council intend to have a District wide structure of EYESP's, DSP's and PRU's that will:

- Provide local EYESP's, DSP's and PRU's, reducing the need for pupils to travel long distances across the District
- Provide an equitable distribution of EYESP's, DSP's and PRU's for children and young people with special educational needs and disabilities
- Provide increased access to the curriculum; both social and academic will be increased due to the staffing experience and capacity of the new EYESP's, DSP's and PRU's. It will be possible to individually differentiate and support the work and potential of each individual pupil
- Provide an increased level of available support to all pupils and will give the greatest opportunity to increase inclusion for EYESP, DSP and PRU pupils who are otherwise very vulnerable
- Provide an improved support network, especially related to training that will support and develop the proposals
- Extend and target multi-agency support into the new EYESP's, DSP's and PRU's especially from the health authority and more specifically speech and language therapy.
- Provide a progression pathway from Primary phase to Secondary phase.



- Create additional Early Years Enhanced Specialist places and develop further specialist provision to enhance the network of high quality Nursery Schools

Central to these proposals is that continuity of provision between early years, primary and secondary phases of education are developed.

Objections and comments:

Within four weeks of the date of publication of this proposal, i.e. by 5pm on 22nd February 2018, any person may submit comments on the proposal (in support or objections) by sending them to the SEN Planning & Project Manager, SEND Services, 5th Floor, Margaret McMillan Tower, Bradford, BD1 1NN or email SENDPlacesConsultation@bradford.gov.uk



Appendix L**Statutory Proposal for a Prescribed Alteration****Proposal to Increase Designated Specialist Provision (DSP) places at Crossflatts Primary School****School and Local Authority details:**

School: Crossflatts Primary School, Morton Lane, Bingley, Bradford, BD16 2EP

This is a maintained primary school.

Local Authority: City of Bradford Metropolitan District Council, City Hall, Bradford BD1 1HY

Description of alteration:

The proposal is to increase the Designated Specialist Provision (DSP) places at Crossflatts Primary School from 12 places to 16 places, for primary aged boys and girls with communication and interaction needs including autistic spectrum conditions. The proposed implementation date is 16 April 2018. The proposed provision is recognised by the Local Authority as reserved for children with special educational needs.

The admission of pupils will be managed by the special educational needs statutory assessment process

No new or additional site is required for this proposed change. No remodelling of the existing buildings will be required.

Consultation:

The Local Authority consulted with all interested parties. The 4 week consultation period commenced on 16th November 2017 and closed on 14th December 2017. A summary of the responses and the outcome of the consultation is attached. (Responses to the Consultation and Outcome of the Consultation report).

Objectives:

The objective of the proposal is to increase the number of DSP places at Crossflatts Primary School from 12 to 16 places for primary aged boys and girls with for primary aged boys and girls with communication and interaction needs including autistic spectrum conditions to accommodate the increasing demand for specialist provision places across the District.



When proposing changes to existing SEND Provision the Proposers have to meet the SEN Improvement Test and be able to demonstrate that the proposed arrangements are likely to lead to improvement in the standard, quality/and or range of educational provision for Children with special educational needs and disabilities. The rationale and expected benefits of the proposal are set out in the attached SEN Improvement Test.

The proposals will build on the good standards for teaching and learning already in place at the school and provide additional local places for local children with special educational needs without having any negative impact on other schools, academies and educational institutions in the area. This would also increase parental choice in the area.

Implementation and any proposed stages for implementation:

The proposed implementation date is 16 April 2018. The admission of pupils will be managed by the special educational needs statutory assessment process. This would ensure a successful outcome for the school and children and young people.

Project Costs:

There are no capital costs associated with the proposed increase in DSP places at Crossflatts Primary School as no new or additional site is required for this change. No remodelling of the existing buildings will be required.

The proposed increase in Designated Specialist Provision places at Crossflatts Primary School will be funded from the High Needs Block part of the Dedicated Schools Grant (DSG). In accordance with the Place Plus Model (the local determined funding formula for special educational needs pupils). Place funding will be delegated to the school for an agreed number of places. Additional funding will be paid in accordance with individual pupil needs (within the established 7 range model). The revenue funding for all DSPs is included in the High Needs Block allocation and the additional commissioned places have been agreed by the Schools Forum.

The Local Authority maintains a Service Level Agreement with each of the schools/academies who host a DSP.

Evidence of demand:

All Local Authorities have a statutory duty to keep under review the provision they make for pupils with special educational needs and disabilities (SEND). This must be based on the regular review of current and future trends (pupil profiles). In monitoring these trends, data and information it has confirmed that further specialist provision is required to meet the needs of its current and future population.



The Local Authority has undertaken a SEND Strategic Review 2016- 2020 to ensure the sufficiency of specialist places for children and young people with special educational needs and disabilities (SEND) and Behaviour.

All the available data shows that there will be an on-going need to provide specialist provision for early years, primary and secondary phase children and young people with a range of special educational needs and disabilities throughout the Bradford District.

The Bradford District has experienced a significant increase in demand for SEND provision in the last 10 years. It is projected that the demand for SEND provision will continue to grow and that in the next 3 years a minimum of 360 additional specialist places for primary and secondary aged children and young people in the Bradford District will be required.

In the last 10 years Bradford has invested significant resources to develop specialist provision within the District to avoid the need to place young people out of District enabling them remain part of their local school community. It is acknowledged that there are exceptional cases where this is not possible.

The Bradford District Education Organisation Plan takes into account different factors when predicting school demand including fertility and birth rates, housing growth and inward/outward migration. Analysis of the Index of Deprivation and population estimates from the Office for National Statistics are also taken into account.

Projections for changes between 2014 and 2018 anticipated that the Districts primary school population will increase by 4.9% and the Districts secondary school population will increase by 10.4%. This makes an overall increase of 7.1%

In January 2005 the population in the Districts Schools and Nurseries was 79,589. In January 2015 the population was 90,292 an increase of 13.4%. In January 2016 the population was 103,773.

Current hypotheses show that an increase in SEN will be 1.5 times the increase in population e.g. a 20% increase in the population represents a 30% increase in demand for specialist provision. The overall needs of the population were predicted to be 33% severe learning difficulties (SLD) 33% profound and multiple learning difficulties (PMLD) 33% on the autism spectrum (ASD).

By 2017 the population of the special schools has changed. The number of children with moderate learning difficulties has dropped significantly. The nature and complexity of the needs of the current children has increased. The number of children on the autism spectrum with other learning difficulties has increased. There have been similar increases for children with profound and multiple learning (PMLD) and physical difficulties (PD) with additional needs.

Pupils with PMLD and PD require additional floor space because of the equipment that is required to support them.



There have been a number of influencing factors in relation to the demand for special school places in the Bradford District:

- Improvements in medical interventions which has significantly increased life expectancy for those children with life limiting conditions
- The overall increase in the pupil population since 2005, particularly within the south Asian community and economically deprived areas.
- An increase in the number of referrals received for statutory assessment
- In 2013/14 the Local Authority received 350 requests for statutory assessment. In 2014/15 the Local Authority received 506 requests for statutory assessment. This represents a 47% increase. In 2015/16 the Local Authority received 666 requests for statutory assessment. Since 2013/14 this represents a 92% increase in the requests for statutory assessment. Approximately 20% of these requests resulted in a change of provision.
- An increase in the number of in-year admissions to special schools
In 2015/16 83 children and young people required a change in provision to special school. For place projection purposes it is anticipated that this number will continue at similar levels for the next three years.
- The capacity of our schools to meet the needs of children and young people with special educational needs

An 11 year analysis of the January PLASC data shows that overall the number of pupils with an education health and care plan and a primary need of severe learning difficulties is about the same overall. However there has been a change to where this group of children go to school. The proportion of children and young people who attend our mainstream schools has decreased significantly. The proportion of children and young people who attend our special schools has increased significantly. This is partly influenced by a growing number of children and young people who attend resourced provision as these provisions have been opened in recent years. This is relatively small in number overall. Another influence could be parental preference for specialist provision but these changes could also be linked to the capacity of our schools to meet a range of learning needs balancing the needs of all children and the pressure to improve standards alongside the level of resources that are delegated directly to schools.

Projections have been applied to the existing population of the District's resourced provisions and special schools. This provides an indication of the future demand for places. By 2018 this shows that additional places will be required to support children and young people with special educational needs and disabilities.

The identification of autism spectrum conditions continues to increase. More clinics have



been established to enable the diagnosis of ASD earlier. Support documents from the Joint Assessment Clinic show there is likely to be an increase in demand for autism provision. Health professionals inform the Local Authority of young children with additional needs. An analysis of these notifications shows that children and young people identified with speech language and communication needs are the largest cohort of notifications received. A significant number of these are likely to receive a diagnosis of autism.

The distribution of special educational needs and disabilities is widespread across the District.

The projected population increases are applied to the current known special educational needs and disabilities population. In addition, other local data such as the Joint Strategic Needs Assessment (JSNA) is considered such as the prevalence of complex health and disability in the local district. The early identification of young children and the outcome of statutory assessments have identified an increase in numbers for some areas of need.

This provides an indication of the future demand for places. By 2018 this shows that additional places will be required to support children and young people with special educational needs.

Long term, Bradford could be successful in the opening of two new specialist free schools to meet current and future need. If successful the earliest opening date for a new free school would be September 2020. As the existing special schools are currently full the Local Authority needs to provide additional places in the meantime.

360 Generic specialist places and 40 specialist behaviour places are required over the next 3 years. Schools Forum has agreed to fund the 400 additional places from the High Needs Block.

Future Specialist Provision

The Bradford District has experienced a significant increase in demand for Special Educational Needs and Disabilities (SEND) provision in the last 10 years.

It is projected that the demand for SEND provision will continue to grow and that in the next 3 years a minimum of 400 additional specialist places across all sectors (EYESP's, DSP's, Special Schools and Pupil Referral Units) in the Bradford District will be required. The School Forum has commissioned the additional places.

- There is an urgent need for more specialist places in Bradford due to the increase in population
- Currently only 1% of Bradford's Special Educational Needs and Disabilities pupils are in special schools and there is a growing need for more specialist places to meet need and demand



- All children are to be valued equally, regardless of their ability, behaviour, family circumstances, ethnic origin, gender and sexual orientation
- All children are to be provided with the best learning opportunities, environment and experience which maximises their learning
- All children are entitled to a broad, balanced and relevant curriculum which is differentiated to meet individual needs
- Children's diverse special educational needs and disabilities require a range of flexible and varied provision

These proposals will expand and develop further specialist provision to enhance the network of Special Schools, EYESP's, DSP's and PRU's which form part of:

- A coherent geographical spread of provision across the District, minimising travel times
- A dynamic network for sharing best practice and experience
- Flexible and responsive provision to best meet the needs of Children and Young People with SEND

Children and Young People with a range of Special Educational Needs and Disabilities will continue to be well served in Bradford. The council is looking at the best way to offer a full range of provision locally for all children. We believe that a flexible district wide model will be able to respond effectively to local changes in demand.

The proposed changes will ensure the continued delivery of high quality and cost effective provision for the Children and Young People of Bradford.

The Council intend to have a District wide structure of EYESP's, DSP's and PRU's that will:

- Provide local EYESP's, DSP's and PRU's, reducing the need for pupils to travel long distances across the District
- Provide an equitable distribution of EYESP's, DSP's and PRU's for children and young people with special educational needs and disabilities
- Provide increased access to the curriculum; both social and academic will be increased due to the staffing experience and capacity of the new EYESP's, DSP's and PRU's. It will be possible to individually differentiate and support the work and potential of each individual pupil
- Provide an increased level of available support to all pupils and will give the greatest opportunity to increase inclusion for EYESP, DSP and PRU pupils who are otherwise very vulnerable
- Provide an improved support network, especially related to training that will support and develop the proposals
- Extend and target multi-agency support into the new EYESP's, DSP's and PRU's especially from the health authority and more specifically speech and language therapy.



- Provide a progression pathway from Primary phase to Secondary phase.
- Create additional Early Years Enhanced Specialist places and develop further specialist provision to enhance the network of high quality Nursery Schools

Central to these proposals is that continuity of provision between early years, primary and secondary phases of education are developed.

Objections and comments:

Within four weeks of the date of publication of this proposal, i.e. by 5pm on 22nd February 2018, any person may submit comments on the proposal (in support or objections) by sending them to the SEN Planning & Project Manager, SEND Services, 5th Floor, Margaret McMillan Tower, Bradford, BD1 1NN or email SENDPlacesConsultation@bradford.gov.uk



Appendix M**Statutory Proposal for a Prescribed Alteration****Proposal to Increase Designated Specialist Provision (DSP) places at The Holy Family Catholic School****School and Local Authority details:**

School: The Holy Family Catholic School, Spring Gardens Lane, Keighley, Bradford, BD20 6LH

This is a maintained secondary school.

Local Authority: City of Bradford Metropolitan District Council, City Hall, Bradford BD1 1HY

Description of alteration:

The proposal is to increase the Designated Specialist Provision (DSP) places at The Holy Family Catholic School from 12 places to 16 places, for secondary aged boys and girls with communication and interaction needs including autistic spectrum conditions. The proposed implementation date is 16 April 2018. The proposed provision is recognised by the Local Authority as reserved for children with special educational needs.

The admission of pupils will be managed by the special educational needs statutory assessment process

It is proposed that remodelling of the existing building would be required to enable the proposed increase in the number of DSP places at the school, The Local Authority has secured the amount of capital costs for the proposed improvements and refurbishments associated with the proposed increase in the number of DSP places at the school.

Consultation:

The Local Authority consulted with all interested parties. The 4 week consultation period commenced on 16th November 2017 and closed on 14th December 2017. A summary of the responses and the outcome of the consultation is attached. (Responses to the Consultation and Outcome of the Consultation report).

Objectives:

The objective of the proposal is to increase the number of DSP places at The Holy Family Catholic School from 12 to 16 places for secondary aged boys and girls with communication and interaction needs including autistic spectrum conditions to accommodate the increasing demand for specialist provision places across the District.



When proposing changes to existing SEND Provision the Proposers have to meet the SEN Improvement Test and be able to demonstrate that the proposed arrangements are likely to lead to improvement in the standard, quality/and or range of educational provision for Children with special educational needs and disabilities. The rationale and expected benefits of the proposal are set out in the attached SEN Improvement Test.

The proposals will build on the good standards for teaching and learning already in place at the school and provide additional local places for local children with special educational needs without having any negative impact on other schools, academies and educational institutions in the area. This would also increase parental choice in the area.

Implementation and any proposed stages for implementation:

The proposed implementation date is 16 April 2018. The admission of pupils will be managed by the special educational needs statutory assessment process. The proposal would ensure a successful outcome for the school and children and young people.

Project Costs:

The Local Authority has secured the amount of capital costs for the proposed improvements and refurbishments associated with the proposed increase in the number of DSP places for pupils at the school.

The proposed increase in Designated Specialist Provision places at The Holy Family Catholic School will be funded from the High Needs Block part of the Dedicated Schools Grant (DSG). In accordance with the Place Plus Model (the local determined funding formula for special educational needs pupils). Place funding will be delegated to the school for an agreed number of places. Additional funding will be paid in accordance with individual pupil needs (within the established 7 range model). The revenue funding for all DSPs is included in the High Needs Block allocation and the additional commissioned places have been agreed by the Schools Forum.

The Local Authority maintains a Service Level Agreement with each of the schools/academies who host a DSP.

Evidence of demand:

All Local Authorities have a statutory duty to keep under review the provision they make for pupils with special educational needs and disabilities (SEND). This must be based on the regular review of current and future trends (pupil profiles). In monitoring these trends, data and information it has confirmed that further specialist provision is required to meet the needs of its current and



future population.

The Local Authority has undertaken a SEND Strategic Review 2016- 2020 to ensure the sufficiency of specialist places for children and young people with special educational needs and disabilities (SEND) and Behaviour.

All the available data shows that there will be an on-going need to provide specialist provision for early years, primary and secondary phase children and young people with a range of special educational needs and disabilities throughout the Bradford District.

The Bradford District has experienced a significant increase in demand for SEND provision in the last 10 years. It is projected that the demand for SEND provision will continue to grow and that in the next 3 years a minimum of 360 additional specialist places for primary and secondary aged children and young people in the Bradford District will be required.

In the last 10 years Bradford has invested significant resources to develop specialist provision within the District to avoid the need to place young people out of District enabling them remain part of their local school community. It is acknowledged that there are exceptional cases where this is not possible.

The Bradford District Education Organisation Plan takes into account different factors when predicting school demand including fertility and birth rates, housing growth and inward/outward migration. Analysis of the Index of Deprivation and population estimates from the Office for National Statistics are also taken into account.

Projections for changes between 2014 and 2018 anticipated that the Districts primary school population will increase by 4.9% and the Districts secondary school population will increase by 10.4%. This makes an overall increase of 7.1%

In January 2005 the population in the Districts Schools and Nurseries was 79,589. In January 2015 the population was 90,292 an increase of 13.4%. In January 2016 the population was 103,773.

Current hypotheses show that an increase in SEN will be 1.5 times the increase in population e.g. a 20% increase in the population represents a 30% increase in demand for specialist provision. The overall needs of the population were predicted to be 33% severe learning difficulties (SLD) 33% profound and multiple learning difficulties (PMLD) 33% on the autism spectrum (ASD).

By 2017 the population of the special schools has changed. The number of children with moderate learning difficulties has dropped significantly. The nature and complexity of the needs of the current children has increased. The number of children on the autism spectrum with other learning difficulties has increased. There have been similar increases for children with profound and multiple learning (PMLD) and physical difficulties (PD) with additional needs.

Pupils with PMLD and PD require additional floor space because of the equipment that is required



to support them.

There have been a number of influencing factors in relation to the demand for special school places in the Bradford District:

- Improvements in medical interventions which has significantly increased life expectancy for those children with life limiting conditions
- The overall increase in the pupil population since 2005, particularly within the south Asian community and economically deprived areas.
- An increase in the number of referrals received for statutory assessment
- In 2013/14 the Local Authority received 350 requests for statutory assessment. In 2014/15 the Local Authority received 506 requests for statutory assessment. This represents a 47% increase. In 2015/16 the Local Authority received 666 requests for statutory assessment. Since 2013/14 this represents a 92% increase in the requests for statutory assessment. Approximately 20% of these requests resulted in a change of provision.
- An increase in the number of in-year admissions to special schools
In 2015/16 83 children and young people required a change in provision to special school. For place projection purposes it is anticipated that this number will continue at similar levels for the next three years.
- The capacity of our schools to meet the needs of children and young people with special educational needs

An 11 year analysis of the January PLASC data shows that overall the number of pupils with an education health and care plan and a primary need of severe learning difficulties is about the same overall. However there has been a change to where this group of children go to school. The proportion of children and young people who attend our mainstream schools has decreased significantly. The proportion of children and young people who attend our special schools has increased significantly. This is partly influenced by a growing number of children and young people who attend resourced provision as these provisions have been opened in recent years. This is relatively small in number overall. Another influence could be parental preference for specialist provision but these changes could also be linked to the capacity of our schools to meet a range of learning needs balancing the needs of all children and the pressure to improve standards alongside the level of resources that are delegated directly to schools.

Projections have been applied to the existing population of the District's resourced provisions and special schools. This provides an indication of the future demand for places. By 2018 this shows that additional places will be required to support children and young people with special educational needs and disabilities.



The identification of autism spectrum conditions continues to increase. More clinics have been established to enable the diagnosis of ASD earlier. Support documents from the Joint Assessment Clinic show there is likely to be an increase in demand for autism provision. Health professionals inform the Local Authority of young children with additional needs. An analysis of these notifications shows that children and young people identified with speech language and communication needs are the largest cohort of notifications received. A significant number of these are likely to receive a diagnosis of autism.

The distribution of special educational needs and disabilities is widespread across the District.

The projected population increases are applied to the current known special educational needs and disabilities population. In addition, other local data such as the Joint Strategic Needs Assessment (JSNA) is considered such as the prevalence of complex health and disability in the local district. The early identification of young children and the outcome of statutory assessments have identified an increase in numbers for some areas of need.

This provides an indication of the future demand for places. By 2018 this shows that additional places will be required to support children and young people with special educational needs.

Long term, Bradford could be successful in the opening of two new specialist free schools to meet current and future need. If successful the earliest opening date for a new free school would be September 2020. As the existing special schools are currently full the Local Authority needs to provide additional places in the meantime.

360 Generic specialist places and 40 specialist behaviour places are required over the next 3 years. Schools Forum has agreed to fund the 400 additional places from the High Needs Block.

Future Specialist Provision

The Bradford District has experienced a significant increase in demand for Special Educational Needs and Disabilities (SEND) provision in the last 10 years.

It is projected that the demand for SEND provision will continue to grow and that in the next 3 years a minimum of 400 additional specialist places across all sectors (EYESP's, DSP's, Special Schools and Pupil Referral Units) in the Bradford District will be required. The School Forum has commissioned the additional places.

- There is an urgent need for more specialist places in Bradford due to the increase in population



- Currently only 1% of Bradford's Special Educational Needs and Disabilities pupils are in special schools and there is a growing need for more specialist places to meet need and demand
- All children are to be valued equally, regardless of their ability, behaviour, family circumstances, ethnic origin, gender and sexual orientation
- All children are to be provided with the best learning opportunities, environment and experience which maximises their learning
- All children are entitled to a broad, balanced and relevant curriculum which is differentiated to meet individual needs
- Children's diverse special educational needs and disabilities require a range of flexible and varied provision

These proposals will expand and develop further specialist provision to enhance the network of Special Schools, EYESP's, DSP's and PRU's which form part of:

- A coherent geographical spread of provision across the District, minimising travel times
- A dynamic network for sharing best practice and experience
- Flexible and responsive provision to best meet the needs of Children and Young People with SEND

Children and Young People with a range of Special Educational Needs and Disabilities will continue to be well served in Bradford. The council is looking at the best way to offer a full range of provision locally for all children. We believe that a flexible district wide model will be able to respond effectively to local changes in demand.

The proposed changes will ensure the continued delivery of high quality and cost effective provision for the Children and Young People of Bradford.

The Council intend to have a District wide structure of EYESP's, DSP's and PRU's that will:

- Provide local EYESP's, DSP's and PRU's, reducing the need for pupils to travel long distances across the District
- Provide an equitable distribution of EYESP's, DSP's and PRU's for children and young people with special educational needs and disabilities
- Provide increased access to the curriculum; both social and academic will be increased due to the staffing experience and capacity of the new EYESP's, DSP's and PRU's. It will be possible to individually differentiate and support the work and potential of each individual pupil
- Provide an increased level of available support to all pupils and will give the greatest opportunity to increase inclusion for EYESP, DSP and PRU pupils who are otherwise very vulnerable
- Provide an improved support network, especially related to training that will support and develop the proposals



- Extend and target multi-agency support into the new EYESP's, DSP's and PRU's especially from the health authority and more specifically speech and language therapy.
- Provide a progression pathway from Primary phase to Secondary phase.
- Create additional Early Years Enhanced Specialist places and develop further specialist provision to enhance the network of high quality Nursery Schools

Central to these proposals is that continuity of provision between early years, primary and secondary phases of education are developed.

Objections and comments:

Within four weeks of the date of publication of this proposal, i.e. by 5pm on 22nd February 2018, any person may submit comments on the proposal (in support or objections) by sending them to the SEN Planning & Project Manager, SEND Services, 5th Floor, Margaret McMillan Tower, Bradford, BD1 1NN or email SENDPlacesConsultation@bradford.gov.uk



Appendix N**Statutory Proposal for a Prescribed Alteration****Proposal to Increase Designated Specialist Provision (DSP) places at Titus Salt School****School and Local Authority details:**

School: Titus Salt School, Higher Coach Road, Baildon, Shipley, Bradford, BD17 5RH
This is a maintained secondary school.

Local Authority: City of Bradford Metropolitan District Council, City Hall, Bradford BD1 1HY

Description of alteration:

The proposal is to increase the Designated Specialist Provision (DSP) places at Titus Salt School from 16 places to 30 places, for secondary aged boys and girls with learning difficulties. The proposed implementation date is 16 April 2018. The proposed provision is recognised by the Local Authority as reserved for children with special educational needs.

The admission of pupils will be managed by the special educational needs statutory assessment process

It is proposed that remodelling of the existing building would be required to enable the proposed increase in the number of DSP places at the school, The Local Authority has secured the amount of capital costs for the proposed improvements and refurbishments associated with the proposed increase in the number of DSP places at the school.

Consultation:

The Local Authority consulted with all interested parties. The 4 week consultation period commenced on 16th November 2017 and closed on 14th December 2017. A summary of the responses and the outcome of the consultation is attached. (Responses to the Consultation and Outcome of the Consultation report).

Objectives:

The objective of the proposal is to increase the number of DSP places at Titus Salt School from 16 to 30 places for secondary aged boys and girls with learning difficulties to accommodate the increasing demand for specialist provision places across the District.



When proposing changes to existing SEND Provision the Proposers have to meet the SEN Improvement Test and be able to demonstrate that the proposed arrangements are likely to lead to improvement in the standard, quality/and or range of educational provision for Children with special educational needs and disabilities. The rationale and expected benefits of the proposal are set out in the attached SEN Improvement Test.

The proposals will build on the good standards for teaching and learning already in place at the school and provide additional local places for local children with special educational needs without having any negative impact on other schools, academies and educational institutions in the area. This would also increase parental choice in the area.

Implementation and any proposed stages for implementation:

The proposed implementation date is 16 April 2018. The admission of pupils will be managed by the special educational needs statutory assessment process. The proposal would ensure a successful outcome for the school and children and young people.

Project Costs:

The Local Authority has secured the amount of capital costs for the proposed improvements and refurbishments associated with the proposed increase in the number of DSP places for pupils at the school.

The proposed increase in Designated Specialist Provision places at Titus Salt School will be funded from the High Needs Block part of the Dedicated Schools Grant (DSG). In accordance with the Place Plus Model (the local determined funding formula for special educational needs pupils). Place funding will be delegated to the school for an agreed number of places. Additional funding will be paid in accordance with individual pupil needs (within the established 7 range model). The revenue funding for all DSPs is included in the High Needs Block allocation and the additional commissioned places have been agreed by the Schools Forum.

The Local Authority maintains a Service Level Agreement with each of the schools/academies who host a DSP.

Evidence of demand:

All Local Authorities have a statutory duty to keep under review the provision they make for pupils with special educational needs and disabilities (SEND). This must be based on the regular review of current and future trends (pupil profiles). In monitoring these trends, data and information it has confirmed that further specialist provision is required to meet the needs of its current and future population.

The Local Authority has undertaken a SEND Strategic Review 2016- 2020 to ensure the



sufficiency of specialist places for children and young people with special educational needs and disabilities (SEND) and Behaviour.

All the available data shows that there will be an on-going need to provide specialist provision for early years, primary and secondary phase children and young people with a range of special educational needs and disabilities throughout the Bradford District.

The Bradford District has experienced a significant increase in demand for SEND provision in the last 10 years. It is projected that the demand for SEND provision will continue to grow and that in the next 3 years a minimum of 360 additional specialist places for primary and secondary aged children and young people in the Bradford District will be required.

In the last 10 years Bradford has invested significant resources to develop specialist provision within the District to avoid the need to place young people out of District enabling them remain part of their local school community. It is acknowledged that there are exceptional cases where this is not possible.

The Bradford District Education Organisation Plan takes into account different factors when predicting school demand including fertility and birth rates, housing growth and inward/outward migration. Analysis of the Index of Deprivation and population estimates from the Office for National Statistics are also taken into account.

Projections for changes between 2014 and 2018 anticipated that the Districts primary school population will increase by 4.9% and the Districts secondary school population will increase by 10.4%. This makes an overall increase of 7.1%

In January 2005 the population in the Districts Schools and Nurseries was 79,589. In January 2015 the population was 90,292 an increase of 13.4%. In January 2016 the population was 103,773.

Current hypotheses show that an increase in SEN will be 1.5 times the increase in population e.g. a 20% increase in the population represents a 30% increase in demand for specialist provision. The overall needs of the population were predicted to be 33% severe learning difficulties (SLD) 33% profound and multiple learning difficulties (PMLD) 33% on the autism spectrum (ASD).

By 2017 the population of the special schools has changed. The number of children with moderate learning difficulties has dropped significantly. The nature and complexity of the needs of the current children has increased. The number of children on the autism spectrum with other learning difficulties has increased. There have been similar increases for children with profound and multiple learning (PMLD) and physical difficulties (PD) with additional needs.

Pupils with PMLD and PD require additional floor space because of the equipment that is required to support them.

There have been a number of influencing factors in relation to the demand for special school



places in the Bradford District:

- Improvements in medical interventions which has significantly increased life expectancy for those children with life limiting conditions
- The overall increase in the pupil population since 2005, particularly within the south Asian community and economically deprived areas.
- An increase in the number of referrals received for statutory assessment
- In 2013/14 the Local Authority received 350 requests for statutory assessment. In 2014/15 the Local Authority received 506 requests for statutory assessment. This represents a 47% increase. In 2015/16 the Local Authority received 666 requests for statutory assessment. Since 2013/14 this represents a 92% increase in the requests for statutory assessment. Approximately 20% of these requests resulted in a change of provision.
- An increase in the number of in-year admissions to special schools
In 2015/16 83 children and young people required a change in provision to special school. For place projection purposes it is anticipated that this number will continue at similar levels for the next three years.
- The capacity of our schools to meet the needs of children and young people with special educational needs

An 11 year analysis of the January PLASC data shows that overall the number of pupils with an education health and care plan and a primary need of severe learning difficulties is about the same overall. However there has been a change to where this group of children go to school. The proportion of children and young people who attend our mainstream schools has decreased significantly. The proportion of children and young people who attend our special schools has increased significantly. This is partly influenced by a growing number of children and young people who attend resourced provision as these provisions have been opened in recent years. This is relatively small in number overall. Another influence could be parental preference for specialist provision but these changes could also be linked to the capacity of our schools to meet a range of learning needs balancing the needs of all children and the pressure to improve standards alongside the level of resources that are delegated directly to schools.

Projections have been applied to the existing population of the District's resourced provisions and special schools. This provides an indication of the future demand for places. By 2018 this shows that additional places will be required to support children and young people with special educational needs and disabilities.

The identification of autism spectrum conditions continues to increase. More clinics have been established to enable the diagnosis of ASD earlier. Support documents from the



Joint Assessment Clinic show there is likely to be an increase in demand for autism provision. Health professionals inform the Local Authority of young children with additional needs. An analysis of these notifications shows that children and young people identified with speech language and communication needs are the largest cohort of notifications received. A significant number of these are likely to receive a diagnosis of autism.

The distribution of special educational needs and disabilities is widespread across the District.

The projected population increases are applied to the current known special educational needs and disabilities population. In addition, other local data such as the Joint Strategic Needs Assessment (JSNA) is considered such as the prevalence of complex health and disability in the local district. The early identification of young children and the outcome of statutory assessments have identified an increase in numbers for some areas of need.

This provides an indication of the future demand for places. By 2018 this shows that additional places will be required to support children and young people with special educational needs.

Long term, Bradford could be successful in the opening of two new specialist free schools to meet current and future need. If successful the earliest opening date for a new free school would be September 2020. As the existing special schools are currently full the Local Authority needs to provide additional places in the meantime.

360 Generic specialist places and 40 specialist behaviour places are required over the next 3 years. Schools Forum has agreed to fund the 400 additional places from the High Needs Block.

Future Specialist Provision

The Bradford District has experienced a significant increase in demand for Special Educational Needs and Disabilities (SEND) provision in the last 10 years.

It is projected that the demand for SEND provision will continue to grow and that in the next 3 years a minimum of 400 additional specialist places across all sectors (EYESP's, DSP's, Special Schools and Pupil Referral Units) in the Bradford District will be required. The School Forum has commissioned the additional places.

- There is an urgent need for more specialist places in Bradford due to the increase in population
- Currently only 1% of Bradford's Special Educational Needs and Disabilities pupils are in special schools and there is a growing need for more specialist places to meet need and demand
- All children are to be valued equally, regardless of their ability, behaviour, family circumstances, ethnic origin, gender and sexual orientation



- All children are to be provided with the best learning opportunities, environment and experience which maximises their learning
- All children are entitled to a broad, balanced and relevant curriculum which is differentiated to meet individual needs
- Children's diverse special educational needs and disabilities require a range of flexible and varied provision

These proposals will expand and develop further specialist provision to enhance the network of Special Schools, EYESP's, DSP's and PRU's which form part of:

- A coherent geographical spread of provision across the District, minimising travel times
- A dynamic network for sharing best practice and experience
- Flexible and responsive provision to best meet the needs of Children and Young People with SEND

Children and Young People with a range of Special Educational Needs and Disabilities will continue to be well served in Bradford. The council is looking at the best way to offer a full range of provision locally for all children. We believe that a flexible district wide model will be able to respond effectively to local changes in demand.

The proposed changes will ensure the continued delivery of high quality and cost effective provision for the Children and Young People of Bradford.

The Council intend to have a District wide structure of EYESP's, DSP's and PRU's that will:

- Provide local EYESP's, DSP's and PRU's, reducing the need for pupils to travel long distances across the District
- Provide an equitable distribution of EYESP's, DSP's and PRU's for children and young people with special educational needs and disabilities
- Provide increased access to the curriculum; both social and academic will be increased due to the staffing experience and capacity of the new EYESP's, DSP's and PRU's. It will be possible to individually differentiate and support the work and potential of each individual pupil
- Provide an increased level of available support to all pupils and will give the greatest opportunity to increase inclusion for EYESP, DSP and PRU pupils who are otherwise very vulnerable
- Provide an improved support network, especially related to training that will support and develop the proposals
- Extend and target multi-agency support into the new EYESP's, DSP's and PRU's especially from the health authority and more specifically speech and language therapy.
- Provide a progression pathway from Primary phase to Secondary phase.



- Create additional Early Years Enhanced Specialist places and develop further specialist provision to enhance the network of high quality Nursery Schools

Central to these proposals is that continuity of provision between early years, primary and secondary phases of education are developed.

Objections and comments:

Within four weeks of the date of publication of this proposal, i.e. by 5pm on 22nd February 2018, any person may submit comments on the proposal (in support or objections) by sending them to the SEN Planning & Project Manager, SEND Services, 5th Floor, Margaret McMillan Tower, Bradford, BD1 1NN or email SENDPlacesConsultation@bradford.gov.uk



Appendix O**Statutory Proposal for a Prescribed Alteration****Proposal to Establish a Designated Specialist Provision (DSP) at Long Lee Primary School****School and Local Authority details:**

School: Long Lee Primary School, Cheery Tree Rise, Keighley, Bradford, BD21 4RU
This is a maintained primary school.

Local Authority: City of Bradford Metropolitan District Council, City Hall, Bradford BD1 1HY

Description of alteration:

The proposal is to establish Designated Specialist Provision (DSP) at Long Lee Primary School with up to 10 places for primary aged boys and girls with social, emotional and mental health needs. The proposed implementation date is 16 April 2018. The proposed provision is recognised by the Local Authority as reserved for children with special educational needs.

The admission of pupils will be managed by the special educational needs statutory assessment process. It is anticipated that the provision will grow over time.

No new or additional site is required but some remodelling of the existing building would be required to enable the proposed establishment of a DSP. The Local Authority has secured the amount of capital costs for the required improvements and refurbishments associated with the proposed establishment of a 10 place DSP at the school..

Consultation:

The Local Authority consulted with all interested parties. The 4 week consultation period commenced on 16th November 2017 and closed on 14th December 2017. A summary of the responses and the outcome of the consultation is attached. (Responses to the Consultation and Outcome of the Consultation report).

Objectives:

The objective of the proposal is to establish a DSP at Long Lee Primary School with up to 10 places for primary aged boys and girls with social, emotional and mental health needs to accommodate the increasing demand for specialist provision places across the District.



When proposing changes to existing SEND Provision the Proposers have to meet the SEN Improvement Test and be able to demonstrate that the proposed arrangements are likely to lead to improvement in the standard, quality/and or range of educational provision for Children with special educational needs and disabilities. The rationale and expected benefits of the proposal are set out in the attached SEN Improvement Test.

The proposals will build on the good standards for teaching and learning already in place at the school and provide additional local places for local children with special educational needs without having any negative impact on other schools, academies and educational institutions in the area. This would also increase parental choice in the area.

Implementation and any proposed stages for implementation:

The proposed implementation date is 16 April 2018. The admission of pupils will be managed by the special educational needs statutory assessment process. It is anticipated that the provision will grow over time. The proposal would ensure a successful outcome for the school and children and young people.

Project Costs:

No new or additional site is required but some remodelling of the existing building would be required to enable the proposed establishment of a DSP. The Local Authority has secured the amount of capital costs for the required improvements and refurbishments associated with the proposed establishment of a 10 place DSP at the school. This would be phased in agreement with the school and Local Authority.

The proposed Designated Specialist Provision places at Long Lee Primary School will be funded from the High Needs Block part of the Dedicated Schools Grant (DSG). In accordance with the Place Plus Model (the local determined funding formula for special educational needs pupils). Place funding will be delegated to the school for an agreed number of places. Additional funding will be paid in accordance with individual pupil needs (within the established 7 range model). The revenue funding for all DSPs is included in the High Needs Block allocation and the additional commissioned places have been agreed by the Schools Forum.

The Local Authority maintains a Service Level Agreement with each of the schools/academies who host a DSP.

Evidence of demand:

All Local Authorities have a statutory duty to keep under review the provision they make for pupils with special educational needs and disabilities (SEND). This must be based on the regular review of current and future trends (pupil profiles). In monitoring these trends, data and information it



has confirmed that further specialist provision is required to meet the needs of its current and future population.

The Local Authority has undertaken a SEND Strategic Review 2016- 2020 to ensure the sufficiency of specialist places for children and young people with special educational needs and disabilities (SEND) and Behaviour.

All the available data shows that there will be an on-going need to provide specialist provision for early years, primary and secondary phase children and young people with a range of special educational needs and disabilities throughout the Bradford District.

The Bradford District has experienced a significant increase in demand for SEND provision in the last 10 years. It is projected that the demand for SEND provision will continue to grow and that in the next 3 years a minimum of 360 additional specialist places for primary and secondary aged children and young people in the Bradford District will be required.

In the last 10 years Bradford has invested significant resources to develop specialist provision within the District to avoid the need to place young people out of District enabling them remain part of their local school community. It is acknowledged that there are exceptional cases where this is not possible.

The Bradford District Education Organisation Plan takes into account different factors when predicting school demand including fertility and birth rates, housing growth and inward/outward migration. Analysis of the Index of Deprivation and population estimates from the Office for National Statistics are also taken into account.

Projections for changes between 2014 and 2018 anticipated that the Districts primary school population will increase by 4.9% and the Districts secondary school population will increase by 10.4%. This makes an overall increase of 7.1%

In January 2005 the population in the Districts Schools and Nurseries was 79,589. In January 2015 the population was 90,292 an increase of 13.4%. In January 2016 the population was 103,773.

Current hypotheses show that an increase in SEN will be 1.5 times the increase in population e.g. a 20% increase in the population represents a 30% increase in demand for specialist provision. The overall needs of the population were predicted to be 33% severe learning difficulties (SLD) 33% profound and multiple learning difficulties (PMLD) 33% on the autism spectrum (ASD).

By 2017 the population of the special schools has changed. The number of children with moderate learning difficulties has dropped significantly. The nature and complexity of the needs of the current children has increased. The number of children on the autism spectrum with other learning difficulties has increased. There have been similar increases for children with profound and multiple learning (PMLD) and physical difficulties (PD) with additional needs.



Pupils with PMLD and PD require additional floor space because of the equipment that is required to support them.

There have been a number of influencing factors in relation to the demand for special school places in the Bradford District:

- Improvements in medical interventions which has significantly increased life expectancy for those children with life limiting conditions
- The overall increase in the pupil population since 2005, particularly within the south Asian community and economically deprived areas.
- An increase in the number of referrals received for statutory assessment
- In 2013/14 the Local Authority received 350 requests for statutory assessment. In 2014/15 the Local Authority received 506 requests for statutory assessment. This represents a 47% increase. In 2015/16 the Local Authority received 666 requests for statutory assessment. Since 2013/14 this represents a 92% increase in the requests for statutory assessment. Approximately 20% of these requests resulted in a change of provision.
- An increase in the number of in-year admissions to special schools
In 2015/16 83 children and young people required a change in provision to special school. For place projection purposes it is anticipated that this number will continue at similar levels for the next three years.
- The capacity of our schools to meet the needs of children and young people with special educational needs

An 11 year analysis of the January PLASC data shows that overall the number of pupils with an education health and care plan and a primary need of severe learning difficulties is about the same overall. However there has been a change to where this group of children go to school. The proportion of children and young people who attend our mainstream schools has decreased significantly. The proportion of children and young people who attend our special schools has increased significantly. This is partly influenced by a growing number of children and young people who attend resourced provision as these provisions have been opened in recent years. This is relatively small in number overall. Another influence could be parental preference for specialist provision but these changes could also be linked to the capacity of our schools to meet a range of learning needs balancing the needs of all children and the pressure to improve standards alongside the level of resources that are delegated directly to schools.

Projections have been applied to the existing population of the District's resourced provisions and special schools. This provides an indication of the future demand for places. By 2018 this shows that additional places will be required to support children and



young people with special educational needs and disabilities.

The identification of autism spectrum conditions continues to increase. More clinics have been established to enable the diagnosis of ASD earlier. Support documents from the Joint Assessment Clinic show there is likely to be an increase in demand for autism provision. Health professionals inform the Local Authority of young children with additional needs. An analysis of these notifications shows that children and young people identified with speech language and communication needs are the largest cohort of notifications received. A significant number of these are likely to receive a diagnosis of autism.

The distribution of special educational needs and disabilities is widespread across the District.

The projected population increases are applied to the current known special educational needs and disabilities population. In addition, other local data such as the Joint Strategic Needs Assessment (JSNA) is considered such as the prevalence of complex health and disability in the local district. The early identification of young children and the outcome of statutory assessments have identified an increase in numbers for some areas of need.

This provides an indication of the future demand for places. By 2018 this shows that additional places will be required to support children and young people with special educational needs.

Long term, Bradford could be successful in the opening of two new specialist free schools to meet current and future need. If successful the earliest opening date for a new free school would be September 2020. As the existing special schools are currently full the Local Authority needs to provide additional places in the meantime.

360 Generic specialist places and 40 specialist behaviour places are required over the next 3 years. Schools Forum has agreed to fund the 400 additional places from the High Needs Block.

Future Specialist Provision

The Bradford District has experienced a significant increase in demand for Special Educational Needs and Disabilities (SEND) provision in the last 10 years.

It is projected that the demand for SEND provision will continue to grow and that in the next 3 years a minimum of 400 additional specialist places across all sectors (EYESP's, DSP's, Special Schools and Pupil Referral Units) in the Bradford District will be required. The School Forum has commissioned the additional places.

- There is an urgent need for more specialist places in Bradford due to the increase in population



- Currently only 1% of Bradford's Special Educational Needs and Disabilities pupils are in special schools and there is a growing need for more specialist places to meet need and demand
- All children are to be valued equally, regardless of their ability, behaviour, family circumstances, ethnic origin, gender and sexual orientation
- All children are to be provided with the best learning opportunities, environment and experience which maximises their learning
- All children are entitled to a broad, balanced and relevant curriculum which is differentiated to meet individual needs
- Children's diverse special educational needs and disabilities require a range of flexible and varied provision

These proposals will expand and develop further specialist provision to enhance the network of Special Schools, EYESP's, DSP's and PRU's which form part of:

- A coherent geographical spread of provision across the District, minimising travel times
- A dynamic network for sharing best practice and experience
- Flexible and responsive provision to best meet the needs of Children and Young People with SEND

Children and Young People with a range of Special Educational Needs and Disabilities will continue to be well served in Bradford. The council is looking at the best way to offer a full range of provision locally for all children. We believe that a flexible district wide model will be able to respond effectively to local changes in demand.

The proposed changes will ensure the continued delivery of high quality and cost effective provision for the Children and Young People of Bradford.

The Council intend to have a District wide structure of EYESP's, DSP's and PRU's that will:

- Provide local EYESP's, DSP's and PRU's, reducing the need for pupils to travel long distances across the District
- Provide an equitable distribution of EYESP's, DSP's and PRU's for children and young people with special educational needs and disabilities
- Provide increased access to the curriculum; both social and academic will be increased due to the staffing experience and capacity of the new EYESP's, DSP's and PRU's. It will be possible to individually differentiate and support the work and potential of each individual pupil
- Provide an increased level of available support to all pupils and will give the greatest opportunity to increase inclusion for EYESP, DSP and PRU pupils who are otherwise very vulnerable
- Provide an improved support network, especially related to training that will support and develop the proposals



- Extend and target multi-agency support into the new EYESP's, DSP's and PRU's especially from the health authority and more specifically speech and language therapy.
- Provide a progression pathway from Primary phase to Secondary phase.
- Create additional Early Years Enhanced Specialist places and develop further specialist provision to enhance the network of high quality Nursery Schools

Central to these proposals is that continuity of provision between early years, primary and secondary phases of education are developed.

Objections and comments:

Within four weeks of the date of publication of this proposal, i.e. by 5pm on 22nd February 2018, any person may submit comments on the proposal (in support or objections) by sending them to the SEN Planning & Project Manager, SEND Services, 5th Floor, Margaret McMillan Tower, Bradford, BD1 1NN or email SENDPlacesConsultation@bradford.gov.uk



Appendix P**Statutory Proposal for a Prescribed Alteration****Proposal to Establish a Designated Specialist Provision (DSP) at Cottingley Village Primary School****School and Local Authority details:**

School: Cottingley Village Primary School, Cottingley Moor Road, Bingley, Bradford, BD16 1SY

This is a maintained primary school.

Local Authority: City of Bradford Metropolitan District Council, City Hall, Bradford BD1 1HY

Description of alteration:

The proposal is to establish Designated Specialist Provision (DSP) at Cottingley Village Primary School with up to 10 places for primary aged boys and girls with social, emotional and mental health needs. The proposed implementation date is 16 April 2018. The proposed provision is recognised by the Local Authority as reserved for children with special educational needs.

The admission of pupils will be managed by the special educational needs statutory assessment process. It is anticipated that the provision will grow over time.

No new or additional site is required but some remodelling of the existing building would be required to enable the proposed establishment of a DSP. The Local Authority has secured the amount of capital costs for the required improvements and refurbishments associated with the proposed establishment of a 10 place DSP at the school.

Consultation:

The Local Authority consulted with all interested parties. The 4 week consultation period commenced on 16th November 2017 and closed on 14th December 2017. A summary of the responses and the outcome of the consultation is attached. (Responses to the Consultation and Outcome of the Consultation report).

Objectives:

The objective of the proposal is to establish a DSP at Cottingley Village Primary School with up to 10 places for primary aged boys and girls with social, emotional and mental health needs to accommodate the increasing demand for specialist provision places



across the District.

When proposing changes to existing SEND Provision the Proposers have to meet the SEN Improvement Test and be able to demonstrate that the proposed arrangements are likely to lead to improvement in the standard, quality/and or range of educational provision for Children with special educational needs and disabilities. The rationale and expected benefits of the proposal are set out in the attached SEN Improvement Test.

The proposals will build on the good standards for teaching and learning already in place at the school and provide additional local places for local children with special educational needs without having any negative impact on other schools, academies and educational institutions in the area. This would also increase parental choice in the area.

Implementation and any proposed stages for implementation:

The proposed implementation date is 16 April 2018. The admission of pupils will be managed by the special educational needs statutory assessment process. It is anticipated that the provision will grow over time. The proposal would ensure a successful outcome for the school and children and young people.

Project Costs:

No new or additional site is required but some remodelling of the existing building would be required to enable the proposed establishment of a DSP. The Local Authority has secured the amount of capital costs for the required improvements and refurbishments associated with the proposed establishment of a 10 place DSP at the school. This would be phased in agreement with the school and Local Authority.

The proposed Designated Specialist Provision places at Cottingley Village Primary School will be funded from the High Needs Block part of the Dedicated Schools Grant (DSG). In accordance with the Place Plus Model (the local determined funding formula for special educational needs pupils). Place funding will be delegated to the school for an agreed number of places. Additional funding will be paid in accordance with individual pupil needs (within the established 7 range model). The revenue funding for all DSPs is included in the High Needs Block allocation and the additional commissioned places have been agreed by the Schools Forum.

The Local Authority maintains a Service Level Agreement with each of the schools/academies who host a DSP.

Evidence of demand:



All Local Authorities have a statutory duty to keep under review the provision they make for pupils with special educational needs and disabilities (SEND). This must be based on the regular review of current and future trends (pupil profiles). In monitoring these trends, data and information it has confirmed that further specialist provision is required to meet the needs of its current and future population.

The Local Authority has undertaken a SEND Strategic Review 2016- 2020 to ensure the sufficiency of specialist places for children and young people with special educational needs and disabilities (SEND) and Behaviour.

All the available data shows that there will be an on-going need to provide specialist provision for early years, primary and secondary phase children and young people with a range of special educational needs and disabilities throughout the Bradford District.

The Bradford District has experienced a significant increase in demand for SEND provision in the last 10 years. It is projected that the demand for SEND provision will continue to grow and that in the next 3 years a minimum of 360 additional specialist places for primary and secondary aged children and young people in the Bradford District will be required.

In the last 10 years Bradford has invested significant resources to develop specialist provision within the District to avoid the need to place young people out of District enabling them remain part of their local school community. It is acknowledged that there are exceptional cases where this is not possible.

The Bradford District Education Organisation Plan takes into account different factors when predicting school demand including fertility and birth rates, housing growth and inward/outward migration. Analysis of the Index of Deprivation and population estimates from the Office for National Statistics are also taken into account.

Projections for changes between 2014 and 2018 anticipated that the Districts primary school population will increase by 4.9% and the Districts secondary school population will increase by 10.4%. This makes an overall increase of 7.1%

In January 2005 the population in the Districts Schools and Nurseries was 79,589. In January 2015 the population was 90,292 an increase of 13.4%. In January 2016 the population was 103,773.

Current hypotheses show that an increase in SEN will be 1.5 times the increase in population e.g. a 20% increase in the population represents a 30% increase in demand for specialist provision. The overall needs of the population were predicted to be 33% severe learning difficulties (SLD) 33% profound and multiple learning difficulties (PMLD) 33% on the autism spectrum (ASD).

By 2017 the population of the special schools has changed. The number of children with moderate learning difficulties has dropped significantly. The nature and complexity of the needs of the current children has increased. The number of children on the autism spectrum with other



learning difficulties has increased. There have been similar increases for children with profound and multiple learning (PMLD) and physical difficulties (PD) with additional needs.

Pupils with PMLD and PD require additional floor space because of the equipment that is required to support them.

There have been a number of influencing factors in relation to the demand for special school places in the Bradford District:

- Improvements in medical interventions which has significantly increased life expectancy for those children with life limiting conditions
- The overall increase in the pupil population since 2005, particularly within the south Asian community and economically deprived areas.
- An increase in the number of referrals received for statutory assessment
- In 2013/14 the Local Authority received 350 requests for statutory assessment. In 2014/15 the Local Authority received 506 requests for statutory assessment. This represents a 47% increase. In 2015/16 the Local Authority received 666 requests for statutory assessment. Since 2013/14 this represents a 92% increase in the requests for statutory assessment. Approximately 20% of these requests resulted in a change of provision.
- An increase in the number of in-year admissions to special schools
In 2015/16 83 children and young people required a change in provision to special school. For place projection purposes it is anticipated that this number will continue at similar levels for the next three years.
- The capacity of our schools to meet the needs of children and young people with special educational needs

An 11 year analysis of the January PLASC data shows that overall the number of pupils with an education health and care plan and a primary need of severe learning difficulties is about the same overall. However there has been a change to where this group of children go to school. The proportion of children and young people who attend our mainstream schools has decreased significantly. The proportion of children and young people who attend our special schools has increased significantly. This is partly influenced by a growing number of children and young people who attend resourced provision as these provisions have been opened in recent years. This is relatively small in number overall. Another influence could be parental preference for specialist provision but these changes could also be linked to the capacity of our schools to meet a range of learning needs balancing the needs of all children and the pressure to improve standards alongside the level of resources that are delegated directly to schools.



Projections have been applied to the existing population of the District's resourced provisions and special schools. This provides an indication of the future demand for places. By 2018 this shows that additional places will be required to support children and young people with special educational needs and disabilities.

The identification of autism spectrum conditions continues to increase. More clinics have been established to enable the diagnosis of ASD earlier. Support documents from the Joint Assessment Clinic show there is likely to be an increase in demand for autism provision. Health professionals inform the Local Authority of young children with additional needs. An analysis of these notifications shows that children and young people identified with speech language and communication needs are the largest cohort of notifications received. A significant number of these are likely to receive a diagnosis of autism.

The distribution of special educational needs and disabilities is widespread across the District.

The projected population increases are applied to the current known special educational needs and disabilities population. In addition, other local data such as the Joint Strategic Needs Assessment (JSNA) is considered such as the prevalence of complex health and disability in the local district. The early identification of young children and the outcome of statutory assessments have identified an increase in numbers for some areas of need.

This provides an indication of the future demand for places. By 2018 this shows that additional places will be required to support children and young people with special educational needs.

Long term, Bradford could be successful in the opening of two new specialist free schools to meet current and future need. If successful the earliest opening date for a new free school would be September 2020. As the existing special schools are currently full the Local Authority needs to provide additional places in the meantime.

360 Generic specialist places and 40 specialist behaviour places are required over the next 3 years. Schools Forum has agreed to fund the 400 additional places from the High Needs Block.

Future Specialist Provision

The Bradford District has experienced a significant increase in demand for Special Educational Needs and Disabilities (SEND) provision in the last 10 years.

It is projected that the demand for SEND provision will continue to grow and that in the next 3 years a minimum of 400 additional specialist places across all sectors (EYESP's, DSP's, Special Schools and Pupil Referral Units) in the Bradford District will be required. The School Forum has commissioned the additional places.



- There is an urgent need for more specialist places in Bradford due to the increase in population
- Currently only 1% of Bradford's Special Educational Needs and Disabilities pupils are in special schools and there is a growing need for more specialist places to meet need and demand
- All children are to be valued equally, regardless of their ability, behaviour, family circumstances, ethnic origin, gender and sexual orientation
- All children are to be provided with the best learning opportunities, environment and experience which maximises their learning
- All children are entitled to a broad, balanced and relevant curriculum which is differentiated to meet individual needs
- Children's diverse special educational needs and disabilities require a range of flexible and varied provision

These proposals will expand and develop further specialist provision to enhance the network of Special Schools, EYESP's, DSP's and PRU's which form part of:

- A coherent geographical spread of provision across the District, minimising travel times
- A dynamic network for sharing best practice and experience
- Flexible and responsive provision to best meet the needs of Children and Young People with SEND

Children and Young People with a range of Special Educational Needs and Disabilities will continue to be well served in Bradford. The council is looking at the best way to offer a full range of provision locally for all children. We believe that a flexible district wide model will be able to respond effectively to local changes in demand.

The proposed changes will ensure the continued delivery of high quality and cost effective provision for the Children and Young People of Bradford.

The Council intend to have a District wide structure of EYESP's, DSP's and PRU's that will:

- Provide local EYESP's, DSP's and PRU's, reducing the need for pupils to travel long distances across the District
- Provide an equitable distribution of EYESP's, DSP's and PRU's for children and young people with special educational needs and disabilities
- Provide increased access to the curriculum; both social and academic will be increased due to the staffing experience and capacity of the new EYESP's, DSP's and PRU's. It will be possible to individually differentiate and support the work and potential of each individual pupil
- Provide an increased level of available support to all pupils and will give the greatest opportunity to increase inclusion for EYESP, DSP and PRU pupils who are otherwise very vulnerable



- Provide an improved support network, especially related to training that will support and develop the proposals
- Extend and target multi-agency support into the new EYESP's, DSP's and PRU's especially from the health authority and more specifically speech and language therapy.
- Provide a progression pathway from Primary phase to Secondary phase.
- Create additional Early Years Enhanced Specialist places and develop further specialist provision to enhance the network of high quality Nursery Schools

Central to these proposals is that continuity of provision between early years, primary and secondary phases of education are developed.

Objections and comments:

Within four weeks of the date of publication of this proposal, i.e. by 5pm on 22nd February 2018, any person may submit comments on the proposal (in support or objections) by sending them to the SEN Planning & Project Manager, SEND Services, 5th Floor, Margaret McMillan Tower, Bradford, BD1 1NN or email SENDPlacesConsultation@bradford.gov.uk



Appendix Q**Statutory Proposal for a Prescribed Alteration****Proposal to Increase Early Years Enhanced Specialist Provision (EYESP) places at Strong Close Nursery School****School and Local Authority details:**

School: Strong Close Nursery School, Airedale Road, Keighley, Bradford, BD21 4LW
This is a maintained nursery school.

Local Authority: City of Bradford Metropolitan District Council, City Hall, Bradford BD1 1HY

Description of alteration:

The proposal is to increase the Early Years Enhanced Specialist Provision (EYESP) places at Strong Close Nursery School from 23 x 0.6 (part time) places to 30 x 0.6 (part time) places, for children aged 2 to 5 years but with capacity for some children aged 5+ where appropriate with a range of special educational needs and disabilities. The proposed implementation date is 16 April 2018. The proposed provision is recognised by the Local Authority as reserved for children with special educational needs.

The admission of pupils will be managed by the special educational needs statutory assessment process

The Early Years Enhanced Specialist places in other maintained and academy Special schools will not be affected by this proposal as these proposed places will be in addition to the Nursery School's places.

No new or additional site is required for this change. No remodelling of the existing buildings will be required.

Consultation:

The Local Authority consulted with all interested parties. The 4 week consultation period commenced on 16th November 2017 and closed on 14th December 2017. A summary of the responses and the outcome of the consultation is attached. (Responses to the Consultation and Outcome of the Consultation report).

Objectives:

The objective of the proposal is to increase the number of Early Years Enhanced Specialist Provision (EYESP) places at Strong Close Nursery School from 23 x 0.6 (part



time) places to 30 x 0.6 part time) places for children aged 2 to 5 years but with capacity for some children aged 5+ where appropriate with a range of special educational needs and disabilities. The proposed provision is recognised by the Local Authority as reserved for children with special educational needs to accommodate the increasing demand for specialist provision places across the District.

When proposing changes to existing SEND Provision the Proposers have to meet the SEN Improvement Test and be able to demonstrate that the proposed arrangements are likely to lead to improvement in the standard, quality/and or range of educational provision for Children with special educational needs and disabilities. The rationale and expected benefits of the proposal are set out in the attached SEN Improvement Test.

The proposals will build on the good standards for teaching and learning already in place at the school and provide additional local places for local children with special educational needs without having any negative impact on other schools, academies and educational institutions in the area. This would also increase parental choice in the area.

Implementation and any proposed stages for implementation:

The proposed implementation date is 16 April 2018. The admission of pupils will be managed by the special educational needs statutory assessment process. This ensures a successful outcome for the school and children and young people.

Project Costs:

There are no capital costs associated with the proposed increase in EYESP places at Strong Close Nursery School as no new or additional site is required for this change. No remodelling of the existing buildings will be required.

The proposed increase in Early Years Enhanced Specialist Provision places at Strong Close Nursery School will be part funded from the Early Years Block and part funded from the High Needs Block.

In accordance with the Place Plus Model (the local determined funding formula for special educational needs pupils) the place funding will be delegated to the school for an agreed number of places from the Early Years Block and the additional place plus element funding will be paid in accordance with individual pupil needs (within the established 7 range model) from the High Needs Block.

The Local Authority maintains a Service Level Agreement with each of the schools who host an EYESP.

Evidence of demand:

All Local Authorities have a statutory duty to keep under review the provision they make for pupils



with special educational needs and disabilities (SEND). This must be based on the regular review of current and future trends (pupil profiles). In monitoring these trends, data and information it has confirmed that further specialist provision is required to meet the needs of its current and future population.

The Local Authority has undertaken a SEND Strategic Review 2016- 2020 to ensure the sufficiency of specialist places for children and young people with special educational needs and disabilities (SEND) and Behaviour.

All the available data shows that there will be an on-going need to provide specialist provision for early years, primary and secondary phase children and young people with a range of special educational needs and disabilities throughout the Bradford District.

The Bradford District has experienced a significant increase in demand for SEND provision in the last 10 years. It is projected that the demand for SEND provision will continue to grow and that in the next 3 years a minimum of 360 additional specialist places for primary and secondary aged children and young people in the Bradford District will be required.

In the last 10 years Bradford has invested significant resources to develop specialist provision within the District to avoid the need to place young people out of District enabling them remain part of their local school community. It is acknowledged that there are exceptional cases where this is not possible.

The Bradford District Education Organisation Plan takes into account different factors when predicting school demand including fertility and birth rates, housing growth and inward/outward migration. Analysis of the Index of Deprivation and population estimates from the Office for National Statistics are also taken into account.

Projections for changes between 2014 and 2018 anticipated that the Districts primary school population will increase by 4.9% and the Districts secondary school population will increase by 10.4%. This makes an overall increase of 7.1%

In January 2005 the population in the Districts Schools and Nurseries was 79,589. In January 2015 the population was 90,292 an increase of 13.4%. In January 2016 the population was 103,773.

Current hypotheses show that an increase in SEN will be 1.5 times the increase in population e.g. a 20% increase in the population represents a 30% increase in demand for specialist provision. The overall needs of the population were predicted to be 33% severe learning difficulties (SLD) 33% profound and multiple learning difficulties (PMLD) 33% on the autism spectrum (ASD).

By 2017 the population of the special schools has changed. The number of children with moderate learning difficulties has dropped significantly. The nature and complexity of the needs of the current children has increased. The number of children on the autism spectrum with other learning difficulties has increased. There have been similar increases for children with profound



and multiple learning (PMLD) and physical difficulties (PD) with additional needs.

Pupils with PMLD and PD require additional floor space because of the equipment that is required to support them.

There have been a number of influencing factors in relation to the demand for special school places in the Bradford District:

- Improvements in medical interventions which has significantly increased life expectancy for those children with life limiting conditions
- The overall increase in the pupil population since 2005, particularly within the south Asian community and economically deprived areas.
- An increase in the number of referrals received for statutory assessment
- In 2013/14 the Local Authority received 350 requests for statutory assessment. In 2014/15 the Local Authority received 506 requests for statutory assessment. This represents a 47% increase. In 2015/16 the Local Authority received 666 requests for statutory assessment. Since 2013/14 this represents a 92% increase in the requests for statutory assessment. Approximately 20% of these requests resulted in a change of provision.
- An increase in the number of in-year admissions to special schools
In 2015/16 83 children and young people required a change in provision to special school. For place projection purposes it is anticipated that this number will continue at similar levels for the next three years.
- The capacity of our schools to meet the needs of children and young people with special educational needs

An 11 year analysis of the January PLASC data shows that overall the number of pupils with an education health and care plan and a primary need of severe learning difficulties is about the same overall. However there has been a change to where this group of children go to school. The proportion of children and young people who attend our mainstream schools has decreased significantly. The proportion of children and young people who attend our special schools has increased significantly. This is partly influenced by a growing number of children and young people who attend resourced provision as these provisions have been opened in recent years. This is relatively small in number overall. Another influence could be parental preference for specialist provision but these changes could also be linked to the capacity of our schools to meet a range of learning needs balancing the needs of all children and the pressure to improve standards alongside the level of resources that are delegated directly to schools.

Projections have been applied to the existing population of the District's resourced



provisions and special schools. This provides an indication of the future demand for places. By 2018 this shows that additional places will be required to support children and young people with special educational needs and disabilities.

The identification of autism spectrum conditions continues to increase. More clinics have been established to enable the diagnosis of ASD earlier. Support documents from the Joint Assessment Clinic show there is likely to be an increase in demand for autism provision. Health professionals inform the Local Authority of young children with additional needs. An analysis of these notifications shows that children and young people identified with speech language and communication needs are the largest cohort of notifications received. A significant number of these are likely to receive a diagnosis of autism.

The distribution of special educational needs and disabilities is widespread across the District.

The projected population increases are applied to the current known special educational needs and disabilities population. In addition, other local data such as the Joint Strategic Needs Assessment (JSNA) is considered such as the prevalence of complex health and disability in the local district. The early identification of young children and the outcome of statutory assessments have identified an increase in numbers for some areas of need.

This provides an indication of the future demand for places. By 2018 this shows that additional places will be required to support children and young people with special educational needs.

Long term, Bradford could be successful in the opening of two new specialist free schools to meet current and future need. If successful the earliest opening date for a new free school would be September 2020. As the existing special schools are currently full the Local Authority needs to provide additional places in the meantime.

360 Generic specialist places and 40 specialist behaviour places are required over the next 3 years. Schools Forum has agreed to fund the 400 additional places from the High Needs Block.

Future Specialist Provision

The Bradford District has experienced a significant increase in demand for Special Educational Needs and Disabilities (SEND) provision in the last 10 years.

It is projected that the demand for SEND provision will continue to grow and that in the next 3 years a minimum of 400 additional specialist places across all sectors (EYESP's, DSP's, Special Schools and Pupil Referral Units) in the Bradford District will be required. The School Forum has commissioned the additional places.



- There is an urgent need for more specialist places in Bradford due to the increase in population
- Currently only 1% of Bradford's Special Educational Needs and Disabilities pupils are in special schools and there is a growing need for more specialist places to meet need and demand
- All children are to be valued equally, regardless of their ability, behaviour, family circumstances, ethnic origin, gender and sexual orientation
- All children are to be provided with the best learning opportunities, environment and experience which maximises their learning
- All children are entitled to a broad, balanced and relevant curriculum which is differentiated to meet individual needs
- Children's diverse special educational needs and disabilities require a range of flexible and varied provision

These proposals will expand and develop further specialist provision to enhance the network of Special Schools, EYESP's, DSP's and PRU's which form part of:

- A coherent geographical spread of provision across the District, minimising travel times
- A dynamic network for sharing best practice and experience
- Flexible and responsive provision to best meet the needs of Children and Young People with SEND

Children and Young People with a range of Special Educational Needs and Disabilities will continue to be well served in Bradford. The council is looking at the best way to offer a full range of provision locally for all children. We believe that a flexible district wide model will be able to respond effectively to local changes in demand.

The proposed changes will ensure the continued delivery of high quality and cost effective provision for the Children and Young People of Bradford.

The Council intend to have a District wide structure of EYESP's, DSP's and PRU's that will:

- Provide local EYESP's, DSP's and PRU's, reducing the need for pupils to travel long distances across the District
- Provide an equitable distribution of EYESP's, DSP's and PRU's for children and young people with special educational needs and disabilities
- Provide increased access to the curriculum; both social and academic will be increased due to the staffing experience and capacity of the new EYESP's, DSP's and PRU's. It will be possible to individually differentiate and support the work and potential of each individual pupil
- Provide an increased level of available support to all pupils and will give the greatest opportunity to increase inclusion for EYESP, DSP and PRU pupils who are otherwise very vulnerable



- Provide an improved support network, especially related to training that will support and develop the proposals
- Extend and target multi-agency support into the new EYESP's, DSP's and PRU's especially from the health authority and more specifically speech and language therapy.
- Provide a progression pathway from Primary phase to Secondary phase.
- Create additional Early Years Enhanced Specialist places and develop further specialist provision to enhance the network of high quality Nursery Schools

Central to these proposals is that continuity of provision between early years, primary and secondary phases of education are developed.

Objections and comments:

Within four weeks of the date of publication of this proposal, i.e. by 5pm on 22nd February 2018, any person may submit comments on the proposal (in support or objections) by sending them to the SEN Planning & Project Manager, SEND Services, 5th Floor, Margaret McMillan Tower, Bradford, BD1 1NN or email SENDPlacesConsultation@bradford.gov.uk



Appendix R**Statutory Proposal for a Prescribed Alteration****Proposal to Increase Early Years Enhanced Specialist Provision (EYESP) places at St Edmunds Nursery School****School and Local Authority details:**

School: St Edmunds Nursery School, Washington Street, Bradford, BD8 9QW

This is a maintained nursery school.

Local Authority: City of Bradford Metropolitan District Council, City Hall, Bradford BD1 1HY

Description of alteration:

The proposal is to increase the Early Years Enhanced Specialist Provision (EYESP) places at St Edmunds Nursery School from 26 x 0.6 (part time) places to 33 x 0.6 (part time) places, for children aged 2 to 5 years but with capacity for some children aged 5+ where appropriate with a range of special educational needs and disabilities. The proposed implementation date is 16 April 2018. The proposed provision is recognised by the Local Authority as reserved for children with special educational needs.

The admission of pupils will be managed by the special educational needs statutory assessment process

The Early Years Enhanced Specialist places in other maintained and academy Special schools will not be affected by this proposal as these proposed places will be in addition to the Nursery School's places.

No new or additional site is required for this change. No remodelling of the existing buildings will be required.

Consultation:

The Local Authority consulted with all interested parties. The 4 week consultation period commenced on 16th November 2017 and closed on 14th December 2017. A summary of the responses and the outcome of the consultation is attached. (Responses to the Consultation and Outcome of the Consultation report).

Objectives:

The objective of the proposal is to increase the number of Early Years Enhanced Specialist Provision (EYESP) places at St Edmunds Nursery School from 26 x 0.6 (part



time) places to 33 x 0.6 (part time) places for children aged 2 to 5 years but with capacity for some children aged 5+ where appropriate with a range of special educational needs and disabilities. The proposed provision is recognised by the Local Authority as reserved for children with special educational needs to accommodate the increasing demand for specialist provision places across the District.

When proposing changes to existing SEND Provision the Proposers have to meet the SEN Improvement Test and be able to demonstrate that the proposed arrangements are likely to lead to improvement in the standard, quality/and or range of educational provision for Children with special educational needs and disabilities. The rationale and expected benefits of the proposal are set out in the attached SEN Improvement Test.

The proposals will build on the good standards for teaching and learning already in place at the school and provide additional local places for local children with special educational needs without having any negative impact on other schools, academies and educational institutions in the area. This would also increase parental choice in the area.

Implementation and any proposed stages for implementation:

The proposed implementation date is 16 April 2018. The admission of pupils will be managed by the special educational needs statutory assessment process. This ensures a successful outcome for the school and children and young people.

Project Costs:

There are no capital costs associated with the proposed increase in EYESP places at St Edmunds Nursery School as no new or additional site is required for this change. No remodelling of the existing buildings will be required.

The proposed increase in Early Years Enhanced Specialist Provision places at St Edmunds Nursery School will be part funded from the Early Years Block and part funded from the High Needs Block.

In accordance with the Place Plus Model (the local determined funding formula for special educational needs pupils) the place funding will be delegated to the school for an agreed number of places from the Early Years Block and the additional place plus element funding will be paid in accordance with individual pupil needs (within the established 7 range model) from the High Needs Block.

The Local Authority maintains a Service Level Agreement with each of the schools who host an EYESP.

Evidence of demand:

All Local Authorities have a statutory duty to keep under review the provision they make for pupils



with special educational needs and disabilities (SEND). This must be based on the regular review of current and future trends (pupil profiles). In monitoring these trends, data and information it has confirmed that further specialist provision is required to meet the needs of its current and future population.

The Local Authority has undertaken a SEND Strategic Review 2016- 2020 to ensure the sufficiency of specialist places for children and young people with special educational needs and disabilities (SEND) and Behaviour.

All the available data shows that there will be an on-going need to provide specialist provision for early years, primary and secondary phase children and young people with a range of special educational needs and disabilities throughout the Bradford District.

The Bradford District has experienced a significant increase in demand for SEND provision in the last 10 years. It is projected that the demand for SEND provision will continue to grow and that in the next 3 years a minimum of 360 additional specialist places for primary and secondary aged children and young people in the Bradford District will be required.

In the last 10 years Bradford has invested significant resources to develop specialist provision within the District to avoid the need to place young people out of District enabling them remain part of their local school community. It is acknowledged that there are exceptional cases where this is not possible.

The Bradford District Education Organisation Plan takes into account different factors when predicting school demand including fertility and birth rates, housing growth and inward/outward migration. Analysis of the Index of Deprivation and population estimates from the Office for National Statistics are also taken into account.

Projections for changes between 2014 and 2018 anticipated that the Districts primary school population will increase by 4.9% and the Districts secondary school population will increase by 10.4%. This makes an overall increase of 7.1%

In January 2005 the population in the Districts Schools and Nurseries was 79,589. In January 2015 the population was 90,292 an increase of 13.4%. In January 2016 the population was 103,773.

Current hypotheses show that an increase in SEN will be 1.5 times the increase in population e.g. a 20% increase in the population represents a 30% increase in demand for specialist provision. The overall needs of the population were predicted to be 33% severe learning difficulties (SLD) 33% profound and multiple learning difficulties (PMLD) 33% on the autism spectrum (ASD).

By 2017 the population of the special schools has changed. The number of children with moderate learning difficulties has dropped significantly. The nature and complexity of the needs of the current children has increased. The number of children on the autism spectrum with other learning difficulties has increased. There have been similar increases for children with profound



and multiple learning (PMLD) and physical difficulties (PD) with additional needs.

Pupils with PMLD and PD require additional floor space because of the equipment that is required to support them.

There have been a number of influencing factors in relation to the demand for special school places in the Bradford District:

- Improvements in medical interventions which has significantly increased life expectancy for those children with life limiting conditions
- The overall increase in the pupil population since 2005, particularly within the south Asian community and economically deprived areas.
- An increase in the number of referrals received for statutory assessment
- In 2013/14 the Local Authority received 350 requests for statutory assessment. In 2014/15 the Local Authority received 506 requests for statutory assessment. This represents a 47% increase. In 2015/16 the Local Authority received 666 requests for statutory assessment. Since 2013/14 this represents a 92% increase in the requests for statutory assessment. Approximately 20% of these requests resulted in a change of provision.
- An increase in the number of in-year admissions to special schools
In 2015/16 83 children and young people required a change in provision to special school. For place projection purposes it is anticipated that this number will continue at similar levels for the next three years.
- The capacity of our schools to meet the needs of children and young people with special educational needs

An 11 year analysis of the January PLASC data shows that overall the number of pupils with an education health and care plan and a primary need of severe learning difficulties is about the same overall. However there has been a change to where this group of children go to school. The proportion of children and young people who attend our mainstream schools has decreased significantly. The proportion of children and young people who attend our special schools has increased significantly. This is partly influenced by a growing number of children and young people who attend resourced provision as these provisions have been opened in recent years. This is relatively small in number overall. Another influence could be parental preference for specialist provision but these changes could also be linked to the capacity of our schools to meet a range of learning needs balancing the needs of all children and the pressure to improve standards alongside the level of resources that are delegated directly to schools.

Projections have been applied to the existing population of the District's resourced



provisions and special schools. This provides an indication of the future demand for places. By 2018 this shows that additional places will be required to support children and young people with special educational needs and disabilities.

The identification of autism spectrum conditions continues to increase. More clinics have been established to enable the diagnosis of ASD earlier. Support documents from the Joint Assessment Clinic show there is likely to be an increase in demand for autism provision. Health professionals inform the Local Authority of young children with additional needs. An analysis of these notifications shows that children and young people identified with speech language and communication needs are the largest cohort of notifications received. A significant number of these are likely to receive a diagnosis of autism.

The distribution of special educational needs and disabilities is widespread across the District.

The projected population increases are applied to the current known special educational needs and disabilities population. In addition, other local data such as the Joint Strategic Needs Assessment (JSNA) is considered such as the prevalence of complex health and disability in the local district. The early identification of young children and the outcome of statutory assessments have identified an increase in numbers for some areas of need.

This provides an indication of the future demand for places. By 2018 this shows that additional places will be required to support children and young people with special educational needs.

Long term, Bradford could be successful in the opening of two new specialist free schools to meet current and future need. If successful the earliest opening date for a new free school would be September 2020. As the existing special schools are currently full the Local Authority needs to provide additional places in the meantime.

360 Generic specialist places and 40 specialist behaviour places are required over the next 3 years. Schools Forum has agreed to fund the 400 additional places from the High Needs Block.

Future Specialist Provision

The Bradford District has experienced a significant increase in demand for Special Educational Needs and Disabilities (SEND) provision in the last 10 years.

It is projected that the demand for SEND provision will continue to grow and that in the next 3 years a minimum of 400 additional specialist places across all sectors (EYESP's, DSP's, Special Schools and Pupil Referral Units) in the Bradford District will be required. The School Forum has commissioned the additional places.



- There is an urgent need for more specialist places in Bradford due to the increase in population
- Currently only 1% of Bradford's Special Educational Needs and Disabilities pupils are in special schools and there is a growing need for more specialist places to meet need and demand
- All children are to be valued equally, regardless of their ability, behaviour, family circumstances, ethnic origin, gender and sexual orientation
- All children are to be provided with the best learning opportunities, environment and experience which maximises their learning
- All children are entitled to a broad, balanced and relevant curriculum which is differentiated to meet individual needs
- Children's diverse special educational needs and disabilities require a range of flexible and varied provision

These proposals will expand and develop further specialist provision to enhance the network of Special Schools, EYESP's, DSP's and PRU's which form part of:

- A coherent geographical spread of provision across the District, minimising travel times
- A dynamic network for sharing best practice and experience
- Flexible and responsive provision to best meet the needs of Children and Young People with SEND

Children and Young People with a range of Special Educational Needs and Disabilities will continue to be well served in Bradford. The council is looking at the best way to offer a full range of provision locally for all children. We believe that a flexible district wide model will be able to respond effectively to local changes in demand.

The proposed changes will ensure the continued delivery of high quality and cost effective provision for the Children and Young People of Bradford.

The Council intend to have a District wide structure of EYESP's, DSP's and PRU's that will:

- Provide local EYESP's, DSP's and PRU's, reducing the need for pupils to travel long distances across the District
- Provide an equitable distribution of EYESP's, DSP's and PRU's for children and young people with special educational needs and disabilities
- Provide increased access to the curriculum; both social and academic will be increased due to the staffing experience and capacity of the new EYESP's, DSP's and PRU's. It will be possible to individually differentiate and support the work and potential of each individual pupil
- Provide an increased level of available support to all pupils and will give the greatest opportunity to increase inclusion for EYESP, DSP and PRU pupils who are otherwise very vulnerable



- Provide an improved support network, especially related to training that will support and develop the proposals
- Extend and target multi-agency support into the new EYESP's, DSP's and PRU's especially from the health authority and more specifically speech and language therapy.
- Provide a progression pathway from Primary phase to Secondary phase.
- Create additional Early Years Enhanced Specialist places and develop further specialist provision to enhance the network of high quality Nursery Schools

Central to these proposals is that continuity of provision between early years, primary and secondary phases of education are developed.

Objections and comments:

Within four weeks of the date of publication of this proposal, i.e. by 5pm on 22nd February 2018, any person may submit comments on the proposal (in support or objections) by sending them to the SEN Planning & Project Manager, SEND Services, 5th Floor, Margaret McMillan Tower, Bradford, BD1 1NN or email SENDPlacesConsultation@bradford.gov.uk



Appendix S**Statutory Proposal for a Prescribed Alteration****Proposal to Increase Early Years Enhanced Specialist Provision (EYESP) places at Canterbury Nursery School****School and Local Authority details:**

School: Canterbury Nursery School, Basil Street, Bradford, BD5 9HL

This is a maintained nursery school.

Local Authority: City of Bradford Metropolitan District Council, City Hall, Bradford BD1 1HY

Description of alteration:

The proposal is to increase the Early Years Enhanced Specialist Provision (EYESP) places at Canterbury Nursery School from 21 x 0.6 (part time) places to 28 x 0.6 (part time) places, for children aged 2 to 5 years but with capacity for some children aged 5+ where appropriate with a range of special educational needs and disabilities. The proposed implementation date is 16 April 2018. The proposed provision is recognised by the Local Authority as reserved for children with special educational needs.

The admission of pupils will be managed by the special educational needs statutory assessment process

The Early Years Enhanced Specialist places in other maintained and academy Special schools will not be affected by this proposal as these proposed places will be in addition to the Nursery School's places.

Remodelling of the existing building will be required to enable the proposed increase in capacity. The Local Authority has secured the amount of capital costs for the required improvements and refurbishments associated with the proposed increase in the number of EYESP pupils.

Consultation:

The Local Authority consulted with all interested parties. The 4 week consultation period commenced on 16th November 2017 and closed on 14th December 2017. A summary of the responses and the outcome of the consultation is attached. (Responses to the Consultation and Outcome of the Consultation report).

Objectives:

The objective of the proposal is to increase the number of Early Years Enhanced Specialist Provision (EYESP) places at Canterbury Nursery School from 21 x 0.6 (part time) places to 28 x 0.6 (part time) places for children aged 2 to 5 years but with capacity for some children aged 5+ where appropriate with a range of special educational needs and disabilities. The proposed provision is recognised by the Local Authority as reserved for children with special educational needs to accommodate the increasing demand for specialist provision places across the District.

When proposing changes to existing SEND Provision the Proposers have to meet the SEN Improvement Test and be able to demonstrate that the proposed arrangements are likely to lead to improvement in the standard, quality/and or range of educational provision for Children with special educational needs and disabilities. The rationale and expected benefits of the proposal are set out in the attached SEN Improvement Test.

The proposals will build on the good standards for teaching and learning already in place at the school and provide additional local places for local children with special educational needs without having any negative impact on other schools, academies and educational institutions in the area. This would also increase parental choice in the area.

Implementation and any proposed stages for implementation:

The proposed implementation date is 16 April 2018. The admission of pupils will be managed by the special educational needs statutory assessment process. This ensures a successful outcome for the school and children and young people.

Project Costs:

The Local Authority has secured the amount of capital costs for the required improvements and refurbishments associated with the proposed increase in the number of EYESP pupils.

The proposed increase in Early Years Enhanced Specialist Provision places at Canterbury Nursery School will be part funded from the Early Years Block and part funded from the High Needs Block.

In accordance with the Place Plus Model (the local determined funding formula for special educational needs pupils) the place funding will be delegated to the school for an agreed number of places from the Early Years Block and the additional place plus element funding will be paid in accordance with individual pupil needs (within the established 7 range model) from the High Needs Block.

The Local Authority maintains a Service Level Agreement with each of the schools who host an EYESP.

Evidence of demand:



All Local Authorities have a statutory duty to keep under review the provision they make for pupils with special educational needs and disabilities (SEND). This must be based on the regular review of current and future trends (pupil profiles). In monitoring these trends, data and information it has confirmed that further specialist provision is required to meet the needs of its current and future population.

The Local Authority has undertaken a SEND Strategic Review 2016- 2020 to ensure the sufficiency of specialist places for children and young people with special educational needs and disabilities (SEND) and Behaviour.

All the available data shows that there will be an on-going need to provide specialist provision for early years, primary and secondary phase children and young people with a range of special educational needs and disabilities throughout the Bradford District.

The Bradford District has experienced a significant increase in demand for SEND provision in the last 10 years. It is projected that the demand for SEND provision will continue to grow and that in the next 3 years a minimum of 360 additional specialist places for primary and secondary aged children and young people in the Bradford District will be required.

In the last 10 years Bradford has invested significant resources to develop specialist provision within the District to avoid the need to place young people out of District enabling them remain part of their local school community. It is acknowledged that there are exceptional cases where this is not possible.

The Bradford District Education Organisation Plan takes into account different factors when predicting school demand including fertility and birth rates, housing growth and inward/outward migration. Analysis of the Index of Deprivation and population estimates from the Office for National Statistics are also taken into account.

Projections for changes between 2014 and 2018 anticipated that the Districts primary school population will increase by 4.9% and the Districts secondary school population will increase by 10.4%. This makes an overall increase of 7.1%

In January 2005 the population in the Districts Schools and Nurseries was 79,589. In January 2015 the population was 90,292 an increase of 13.4%. In January 2016 the population was 103,773.

Current hypotheses show that an increase in SEN will be 1.5 times the increase in population e.g. a 20% increase in the population represents a 30% increase in demand for specialist provision. The overall needs of the population were predicted to be 33% severe learning difficulties (SLD) 33% profound and multiple learning difficulties (PMLD) 33% on the autism spectrum (ASD).

By 2017 the population of the special schools has changed. The number of children with moderate learning difficulties has dropped significantly. The nature and complexity of the needs



of the current children has increased. The number of children on the autism spectrum with other learning difficulties has increased. There have been similar increases for children with profound and multiple learning (PMLD) and physical difficulties (PD) with additional needs.

Pupils with PMLD and PD require additional floor space because of the equipment that is required to support them.

There have been a number of influencing factors in relation to the demand for special school places in the Bradford District:

- Improvements in medical interventions which has significantly increased life expectancy for those children with life limiting conditions
- The overall increase in the pupil population since 2005, particularly within the south Asian community and economically deprived areas.
- An increase in the number of referrals received for statutory assessment
- In 2013/14 the Local Authority received 350 requests for statutory assessment. In 2014/15 the Local Authority received 506 requests for statutory assessment. This represents a 47% increase. In 2015/16 the Local Authority received 666 requests for statutory assessment. Since 2013/14 this represents a 92% increase in the requests for statutory assessment. Approximately 20% of these requests resulted in a change of provision.
- An increase in the number of in-year admissions to special schools
In 2015/16 83 children and young people required a change in provision to special school. For place projection purposes it is anticipated that this number will continue at similar levels for the next three years.
- The capacity of our schools to meet the needs of children and young people with special educational needs

An 11 year analysis of the January PLASC data shows that overall the number of pupils with an education health and care plan and a primary need of severe learning difficulties is about the same overall. However there has been a change to where this group of children go to school. The proportion of children and young people who attend our mainstream schools has decreased significantly. The proportion of children and young people who attend our special schools has increased significantly. This is partly influenced by a growing number of children and young people who attend resourced provision as these provisions have been opened in recent years. This is relatively small in number overall. Another influence could be parental preference for specialist provision but these changes could also be linked to the capacity of our schools to meet a range of learning needs balancing the needs of all children and the pressure to improve standards alongside the level of resources that are delegated directly to schools.



Projections have been applied to the existing population of the District's resourced provisions and special schools. This provides an indication of the future demand for places. By 2018 this shows that additional places will be required to support children and young people with special educational needs and disabilities.

The identification of autism spectrum conditions continues to increase. More clinics have been established to enable the diagnosis of ASD earlier. Support documents from the Joint Assessment Clinic show there is likely to be an increase in demand for autism provision. Health professionals inform the Local Authority of young children with additional needs. An analysis of these notifications shows that children and young people identified with speech language and communication needs are the largest cohort of notifications received. A significant number of these are likely to receive a diagnosis of autism.

The distribution of special educational needs and disabilities is widespread across the District.

The projected population increases are applied to the current known special educational needs and disabilities population. In addition, other local data such as the Joint Strategic Needs Assessment (JSNA) is considered such as the prevalence of complex health and disability in the local district. The early identification of young children and the outcome of statutory assessments have identified an increase in numbers for some areas of need.

This provides an indication of the future demand for places. By 2018 this shows that additional places will be required to support children and young people with special educational needs.

Long term, Bradford could be successful in the opening of two new specialist free schools to meet current and future need. If successful the earliest opening date for a new free school would be September 2020. As the existing special schools are currently full the Local Authority needs to provide additional places in the meantime.

360 Generic specialist places and 40 specialist behaviour places are required over the next 3 years. Schools Forum has agreed to fund the 400 additional places from the High Needs Block.

Future Specialist Provision

The Bradford District has experienced a significant increase in demand for Special Educational Needs and Disabilities (SEND) provision in the last 10 years.

It is projected that the demand for SEND provision will continue to grow and that in the next 3 years a minimum of 400 additional specialist places across all sectors (EYESP's, DSP's, Special Schools and Pupil Referral Units) in the Bradford District will be required. The School Forum has commissioned the additional places.



- There is an urgent need for more specialist places in Bradford due to the increase in population
- Currently only 1% of Bradford's Special Educational Needs and Disabilities pupils are in special schools and there is a growing need for more specialist places to meet need and demand
- All children are to be valued equally, regardless of their ability, behaviour, family circumstances, ethnic origin, gender and sexual orientation
- All children are to be provided with the best learning opportunities, environment and experience which maximises their learning
- All children are entitled to a broad, balanced and relevant curriculum which is differentiated to meet individual needs
- Children's diverse special educational needs and disabilities require a range of flexible and varied provision

These proposals will expand and develop further specialist provision to enhance the network of Special Schools, EYESP's, DSP's and PRU's which form part of:

- A coherent geographical spread of provision across the District, minimising travel times
- A dynamic network for sharing best practice and experience
- Flexible and responsive provision to best meet the needs of Children and Young People with SEND

Children and Young People with a range of Special Educational Needs and Disabilities will continue to be well served in Bradford. The council is looking at the best way to offer a full range of provision locally for all children. We believe that a flexible district wide model will be able to respond effectively to local changes in demand.

The proposed changes will ensure the continued delivery of high quality and cost effective provision for the Children and Young People of Bradford.

The Council intend to have a District wide structure of EYESP's, DSP's and PRU's that will:

- Provide local EYESP's, DSP's and PRU's, reducing the need for pupils to travel long distances across the District
- Provide an equitable distribution of EYESP's, DSP's and PRU's for children and young people with special educational needs and disabilities
- Provide increased access to the curriculum; both social and academic will be increased due to the staffing experience and capacity of the new EYESP's, DSP's and PRU's. It will be possible to individually differentiate and support the work and potential of each individual pupil



- Provide an increased level of available support to all pupils and will give the greatest opportunity to increase inclusion for EYESP, DSP and PRU pupils who are otherwise very vulnerable
- Provide an improved support network, especially related to training that will support and develop the proposals
- Extend and target multi-agency support into the new EYESP's, DSP's and PRU's especially from the health authority and more specifically speech and language therapy.
- Provide a progression pathway from Primary phase to Secondary phase.
- Create additional Early Years Enhanced Specialist places and develop further specialist provision to enhance the network of high quality Nursery Schools

Central to these proposals is that continuity of provision between early years, primary and secondary phases of education are developed.

Objections and comments:

Within four weeks of the date of publication of this proposal, i.e. by 5pm on 22nd February 2018, any person may submit comments on the proposal (in support or objections) by sending them to the SEN Planning & Project Manager, SEND Services, 5th Floor, Margaret McMillan Tower, Bradford, BD1 1NN or email SENDPlacesConsultation@bradford.gov.uk



Appendix T**Statutory Proposal for a Prescribed Alteration****Proposal to Establish Early Years Enhanced Specialist Provision (EYESP) at Abbey Green Nursery School****School and Local Authority details:**

School: Abbey Green Nursery School, Green Lane, Bradford, BD8 8HT_____This is a maintained nursery school.

Local Authority: City of Bradford Metropolitan District Council, City Hall, Bradford BD1 1HY

Description of alteration:

The proposal is to formally establish Early Years Enhanced Specialist Provision (EYESP) at Abbey Green Nursery School with up to 20 x 0.6 (part time) places for children aged 2 to 5 years but with capacity for some children aged 5+ where appropriate with a range of special educational needs and disabilities. The proposed implementation date is 16 April 2018. The proposed provision is recognised by the Local Authority as reserved for children with special educational needs.

This is a proposal to formally establish the EYESP at Abbey Green Nursery School. The Nursery School does not currently provide enhanced SEND provision. Under the proposal the nursery will establish EYESP provision for 20 children; 13 x 0.6 EYESP places, funded from the under occupancy of other Childrens Centre Plus settings and a further 7 x 0.6 (part time) places making the EYESP at the school a 20 x 0.6 (part time) places provision.

The Early Years Enhanced Specialist places in other maintained and academy Special schools will not be affected by this proposal as these proposed places will be in addition to the Nursery School places.

The admission of pupils will be managed by the special educational needs statutory assessment process. It is anticipated that the provision will grow over time.

Remodelling of the existing building will be required to enable the proposed increase in capacity. The Local Authority has secured the amount of capital costs for the required improvements and refurbishments associated with the proposed increase in the number of EYESP pupils..

Consultation:

The Local Authority consulted with all interested parties. The 4 week consultation period



commenced on 16th November 2017 and closed on 14th December 2017. A summary of the responses and the outcome of the consultation is attached. (Responses to the Consultation and Outcome of the Consultation report).

Objectives:

The proposal is to formally establish Early Years Enhanced Specialist Provision (EYESP) at Abbey Green Nursery School with up to 20 x 0.6 (part time) places for children aged 2 to 5 years but with capacity for some children aged 5+ where appropriate with a range of special educational needs and disabilities. The proposed provision is recognised by the Local Authority as reserved for children with special educational needs to accommodate the increasing demand for specialist provision places across the District.

When proposing changes to existing SEND Provision the Proposers have to meet the SEN Improvement Test and be able to demonstrate that the proposed arrangements are likely to lead to improvement in the standard, quality/and or range of educational provision for Children with special educational needs and disabilities. The rationale and expected benefits of the proposal are set out in the attached SEN Improvement Test.

The proposals will build on the good standards for teaching and learning already in place at the school and provide additional local places for local children with special educational needs without having any negative impact on other schools, academies and educational institutions in the area. This would also increase parental choice in the area.

Implementation and any proposed stages for implementation:

The proposed implementation date is 16 April 2018. The admission of pupils will be managed by the special educational needs statutory assessment process. It is anticipated that the provision will grow over time. This ensures a successful outcome for the children.

Project Costs:

The Local Authority has secured the amount of capital costs for the required improvements and refurbishments associated with the proposed increase in the number of EYESP pupils.

The proposed increase in Early Years Enhanced Specialist Provision places at Abbey Green Nursery School will be part funded from the Early Years Block and part funded from the High Needs Block.

In accordance with the Place Plus Model (the local determined funding formula for special educational needs pupils) the place funding will be delegated to the school for an agreed number of places from the Early Years Block and the additional place plus element funding will be paid in accordance with individual pupil needs (within the established 7 range model) from the High Needs Block.



The Local Authority maintains a Service Level Agreement with each of the schools who host an EYESP.

Evidence of demand:

All Local Authorities have a statutory duty to keep under review the provision they make for pupils with special educational needs and disabilities (SEND). This must be based on the regular review of current and future trends (pupil profiles). In monitoring these trends, data and information it has confirmed that further specialist provision is required to meet the needs of its current and future population.

The Local Authority has undertaken a SEND Strategic Review 2016- 2020 to ensure the sufficiency of specialist places for children and young people with special educational needs and disabilities (SEND) and Behaviour.

All the available data shows that there will be an on-going need to provide specialist provision for early years, primary and secondary phase children and young people with a range of special educational needs and disabilities throughout the Bradford District.

The Bradford District has experienced a significant increase in demand for SEND provision in the last 10 years. It is projected that the demand for SEND provision will continue to grow and that in the next 3 years a minimum of 360 additional specialist places for primary and secondary aged children and young people in the Bradford District will be required.

In the last 10 years Bradford has invested significant resources to develop specialist provision within the District to avoid the need to place young people out of District enabling them remain part of their local school community. It is acknowledged that there are exceptional cases where this is not possible.

The Bradford District Education Organisation Plan takes into account different factors when predicting school demand including fertility and birth rates, housing growth and inward/outward migration. Analysis of the Index of Deprivation and population estimates from the Office for National Statistics are also taken into account.

Projections for changes between 2014 and 2018 anticipated that the Districts primary school population will increase by 4.9% and the Districts secondary school population will increase by 10.4%. This makes an overall increase of 7.1%

In January 2005 the population in the Districts Schools and Nurseries was 79,589. In January 2015 the population was 90,292 an increase of 13.4%. In January 2016 the population was 103,773.

Current hypotheses show that an increase in SEN will be 1.5 times the increase in population e.g.



a 20% increase in the population represents a 30% increase in demand for specialist provision. The overall needs of the population were predicted to be 33% severe learning difficulties (SLD) 33% profound and multiple learning difficulties (PMLD) 33% on the autism spectrum (ASD).

By 2017 the population of the special schools has changed. The number of children with moderate learning difficulties has dropped significantly. The nature and complexity of the needs of the current children has increased. The number of children on the autism spectrum with other learning difficulties has increased. There have been similar increases for children with profound and multiple learning (PMLD) and physical difficulties (PD) with additional needs.

Pupils with PMLD and PD require additional floor space because of the equipment that is required to support them.

There have been a number of influencing factors in relation to the demand for special school places in the Bradford District:

- Improvements in medical interventions which has significantly increased life expectancy for those children with life limiting conditions
- The overall increase in the pupil population since 2005, particularly within the south Asian community and economically deprived areas.
- An increase in the number of referrals received for statutory assessment
- In 2013/14 the Local Authority received 350 requests for statutory assessment. In 2014/15 the Local Authority received 506 requests for statutory assessment. This represents a 47% increase. In 2015/16 the Local Authority received 666 requests for statutory assessment. Since 2013/14 this represents a 92% increase in the requests for statutory assessment. Approximately 20% of these requests resulted in a change of provision.
- An increase in the number of in-year admissions to special schools
In 2015/16 83 children and young people required a change in provision to special school. For place projection purposes it is anticipated that this number will continue at similar levels for the next three years.
- The capacity of our schools to meet the needs of children and young people with special educational needs

An 11 year analysis of the January PLASC data shows that overall the number of pupils with an education health and care plan and a primary need of severe learning difficulties is about the same overall. However there has been a change to where this group of children go to school. The proportion of children and young people who attend our mainstream schools has decreased significantly. The proportion of children and young people who attend our special schools has increased significantly. This is partly influenced by a



growing number of children and young people who attend resourced provision as these provisions have been opened in recent years. This is relatively small in number overall. Another influence could be parental preference for specialist provision but these changes could also be linked to the capacity of our schools to meet a range of learning needs balancing the needs of all children and the pressure to improve standards alongside the level of resources that are delegated directly to schools.

Projections have been applied to the existing population of the District's resourced provisions and special schools. This provides an indication of the future demand for places. By 2018 this shows that additional places will be required to support children and young people with special educational needs and disabilities.

The identification of autism spectrum conditions continues to increase. More clinics have been established to enable the diagnosis of ASD earlier. Support documents from the Joint Assessment Clinic show there is likely to be an increase in demand for autism provision. Health professionals inform the Local Authority of young children with additional needs. An analysis of these notifications shows that children and young people identified with speech language and communication needs are the largest cohort of notifications received. A significant number of these are likely to receive a diagnosis of autism.

The distribution of special educational needs and disabilities is widespread across the District.

The projected population increases are applied to the current known special educational needs and disabilities population. In addition, other local data such as the Joint Strategic Needs Assessment (JSNA) is considered such as the prevalence of complex health and disability in the local district. The early identification of young children and the outcome of statutory assessments have identified an increase in numbers for some areas of need.

This provides an indication of the future demand for places. By 2018 this shows that additional places will be required to support children and young people with special educational needs.

Long term, Bradford could be successful in the opening of two new specialist free schools to meet current and future need. If successful the earliest opening date for a new free school would be September 2020. As the existing special schools are currently full the Local Authority needs to provide additional places in the meantime.

360 Generic specialist places and 40 specialist behaviour places are required over the next 3 years. Schools Forum has agreed to fund the 400 additional places from the High Needs Block.

Future Specialist Provision



The Bradford District has experienced a significant increase in demand for Special Educational Needs and Disabilities (SEND) provision in the last 10 years.

It is projected that the demand for SEND provision will continue to grow and that in the next 3 years a minimum of 400 additional specialist places across all sectors (EYESP's, DSP's, Special Schools and Pupil Referral Units) in the Bradford District will be required. The School Forum has commissioned the additional places.

- There is an urgent need for more specialist places in Bradford due to the increase in population
- Currently only 1% of Bradford's Special Educational Needs and Disabilities pupils are in special schools and there is a growing need for more specialist places to meet need and demand
- All children are to be valued equally, regardless of their ability, behaviour, family circumstances, ethnic origin, gender and sexual orientation
- All children are to be provided with the best learning opportunities, environment and experience which maximises their learning
- All children are entitled to a broad, balanced and relevant curriculum which is differentiated to meet individual needs
- Children's diverse special educational needs and disabilities require a range of flexible and varied provision

These proposals will expand and develop further specialist provision to enhance the network of Special Schools, EYESP's, DSP's and PRU's which form part of:

- A coherent geographical spread of provision across the District, minimising travel times
- A dynamic network for sharing best practice and experience
- Flexible and responsive provision to best meet the needs of Children and Young People with SEND

Children and Young People with a range of Special Educational Needs and Disabilities will continue to be well served in Bradford. The council is looking at the best way to offer a full range of provision locally for all children. We believe that a flexible district wide model will be able to respond effectively to local changes in demand.

The proposed changes will ensure the continued delivery of high quality and cost effective provision for the Children and Young People of Bradford.

The Council intend to have a District wide structure of EYESP's, DSP's and PRU's that will:

- Provide local EYESP's, DSP's and PRU's, reducing the need for pupils to travel long distances across the District
- Provide an equitable distribution of EYESP's, DSP's and PRU's for children and young people with special educational needs and disabilities



- Provide increased access to the curriculum; both social and academic will be increased due to the staffing experience and capacity of the new EYESP's, DSP's and PRU's. It will be possible to individually differentiate and support the work and potential of each individual pupil
- Provide an increased level of available support to all pupils and will give the greatest opportunity to increase inclusion for EYESP, DSP and PRU pupils who are otherwise very vulnerable
- Provide an improved support network, especially related to training that will support and develop the proposals
- Extend and target multi-agency support into the new EYESP's, DSP's and PRU's especially from the health authority and more specifically speech and language therapy.
- Provide a progression pathway from Primary phase to Secondary phase.
- Create additional Early Years Enhanced Specialist places and develop further specialist provision to enhance the network of high quality Nursery Schools

Central to these proposals is that continuity of provision between early years, primary and secondary phases of education are developed.

Objections and comments:

Within four weeks of the date of publication of this proposal, i.e. by 5pm on 22nd February 2018, any person may submit comments on the proposal (in support or objections) by sending them to the SEN Planning & Project Manager, SEND Services, 5th Floor, Margaret McMillan Tower, Bradford, BD1 1NN or email SENDPlacesConsultation@bradford.gov.uk



Appendix U

Response to the Statutory Notices

- i. I wanted to ask if there is any news on the outcomes of the Local Authority's consultation on DSP places. You will remember that I, and other local families, feel that Bradford is not meeting its responsibility to ensure suitable education for all children in the borough because there is no specialist provision for autism at all in Wharfedale.

- ii. Please find attached a response from our chair of Governors re the SEMH enhanced provision at Long Lee. The Governors have no objections to the enhanced provision but would just like it noted, as stated in the letter, that the original proposed number was a 6 place provision and that if using the current facilities we only have the capacity for 6 children and not the 10 as stated in the proposal.

- iii. I am writing to set out our beliefs, views and concerns regarding the education and inclusion of children with Down syndrome in the Bradford Area.
 Our charity, founded in 2000, to support the development, education and inclusion of children and young people with Down syndrome by offering training, intervention and guidance to both families and professionals, fully believes that the best place to educate a child with Down syndrome is in the mainstream.
 Such beliefs are supported by research (in particular by Prof. S Buckley, Down Syndrome Education International) which has demonstrated, many times, the significant gains made in understanding, speech, language, social skills, appropriate behaviours, reading, number, general knowledge, expectations of, and inclusion in, everyday society.
 Such inclusion promotes positivity and belonging; children are educated in the mainstream with the view that they will be living their adult lives in the mainstream.

All of our efforts over the last 17 years have been focussed on developing training and intervention programmes to help support our beliefs and we have been very successful in our endeavours. We are well known across the UK for our training and best practice.

Our concerns arise from the current situation, the proposed changes to SEN placements in Bradford. Over last term we experienced an increase in the number of schools (sometimes via parents) approaching us because they felt they could no longer support and educate a child with Down syndrome. That they felt they could no longer meet their needs and that the child did not belong in their setting. The tendency seems to be for pupils around year 2.



From many years of experience we know that lack of funding and training can result in schools being ill equipped to make good preparation and provision for a child with Down syndrome. This lack of preparation results in reduced expectation, unmet learning needs, poor progress and unwanted behaviours.

The answer is not special school but improved provision within the mainstream so that a school is fully prepared and the placement a success.

The opening of several new special schools in Bradford may be a good thing for pupils with more complex needs, but not, in the longer term, for children with Down syndrome. However we are concerned that mainstream schools who are struggling to meet needs may view this as an opportunity to remove the child from their setting.

We would like to see increased support for schools with a child(ren) with Down syndrome on role, we do our very best, but as a charity we are continually stretched beyond capacity.

We would also like to suggest that Designated Specialist Provision within a mainstream primary school be established to provide places for children with Down syndrome and other MLD, who are being failed by their current mainstream placements. This would provide them with the option of maintaining a semi-mainstream education but with more specialist provision. Such a setting could also be supported by our charity and could be used as a centre of expertise and best practice for other schools.

I hope to be able to attend the next SEND strategy group meeting but in the meantime please can this letter be acknowledged as our response to the consultation about the new specialist provision.

- iv. Having read the consultation, I think it is important to consider the impact of increasing special school places on input from the Speech and Language Therapy Service. An increase in special school places will naturally lead to an increase in referrals from the Special Schools to the Speech and Language Therapy Service. However, without increased funding to deliver this service, it will be hard to meet the demands that extra referrals will create.
- v. I am writing to comment regarding the consultation on additional DSP places across the Bradford District, on behalf of the Bradford Speech and Language Therapy Services.
The Local Authority currently commission Speech and Language Therapy Services to the existing DSPs.

There is no comment in the document about access to specialist services. New provisions are likely to have higher needs in training and developing specialist skills



in Learning Disability and Autism Spectrum Conditions and as such are likely to have an increased need for access to Speech and Language Therapists to provide this. This could not be provided within the current contract and therefore I am commenting to highlight the need to consider additional funding for Speech and Language Therapy in line with the increased provisions.

One requirement of the SEN Improvement test is:

“The required improvements of the test are as follows:

Improved access to specialist staff, both education and other professionals, including external support and outreach services”

Increasing the DSP places without increasing Speech and Language Therapy input will not improve access to external services and additionally, any attempt to provide services on the current contract will result in less access to external support being provided to existing DSPs.

In regards to other specialist provisions , there is extensive research to indicate that a large percentage of students with behavioural difficulties or social, emotional and mental health issues have undiagnosed, significant speech, language and communication needs. In light of this, I would urge the Local Authority to consider commissioning a suitable level of Speech and Language Therapy in order to provide appropriate recognition of communication difficulties, to increase staff awareness and knowledge of how to support young people with speech, language and communication needs, as well as communication assessments to avoid further difficulties caused by a lack of an appropriate diagnosis.

Further information regarding the links between SLCN and behavioural, social, emotional and mental health needs can be found here;

https://www.thecommunicationtrust.org.uk/media/2612/communication_difficulties_-_facts_and_stats.pdf

Key points;

- Two thirds of 7 -14 year olds with serious behaviour problems have language impairment.
- At least 60% of young people in young offender institutions have communication difficulties.
- Those with a history of early language impairment are at higher risk of mental health problems e.g. 2.7 times more likely of having a social phobia by age 19.

<https://www.gov.uk/government/publications/the-relationship-between-speech-language-and-communication-needs-slcn-and-behavioural-emotional-and-social-difficulties-besd>

vii.



- 1) Southfield School has expanded up to have 265 students on roll as part of the collective response to growth in demand for additional special school places and is now full. The accommodation, which was built for 220, is above capacity, and despite discussions with LA colleagues there is no current plan to increase accommodation. On conversion in 2011 the LA advised the DfE to award a PAN of 260, and so the academy does not need to apply for a 'Making significant changes to an academy' approval to regularise the current position.
- 2) The Trust notes the LA's wish to see the numbers at Southfield rise further in order to support the pressing need for additional places, and will be willing to write a business case for consideration by the Headteacher Board, but only once a capital scheme has been identified and planning permission granted, to provide the accommodation for the additional 24 children already admitted since April 2017, and additional numbers identified in the consultation paper.
- 3) In September 2016, in the context of Grange Technology College being placed in special measures, Southfield School accepted responsibility for the EDSP provision, which was also failing. In a series of discussions with LA officers including Simon Ramsden and Angela Spencer-Brook during early 2017 agreement was reached to close the provision to new admissions and subsume the pupil population – who had no meaningful mainstream engagement due to their extreme challenging behaviour – within the special school population. This has been recognised by the LA for planning and funding purposes, an example being your own report to the DCS which on page 4 in a table showing current special school provision allocates 265 registered places to Southfield, including an asterisked note "includes 12 EDSP places". We now consider that the EDSP provision is closed and will not operate as a discrete provision for admission into, under either Southfield or Grange's management.
- 4) The current consultation documents make reference in the section on DSP provision to 12 places for ASD in Grange – which we agree is accurate – and an additional 12 places for ASD listed at 'Southfield Grange', which suggests we will be expected to provide 265 special school places plus an additional 12 DSP at Southfield. We wish to state clearly that this cannot be supported for the reasons given in points 1 and 2 above.
- 5) The Southfield Grange Trust, working in partnership with Delius Special School and Titus Salt School, has led work within the LA to develop applications for new Special Free Schools that will provide 300 places of SEND specialist provision, and is part of the New Schools Network Development Programme awaiting the announcement of Wave 13 Free School programme. We will work tirelessly to secure a new school building programme for Bradford so that new high quality accommodation can be provided in response to the growth in demand for specialist inclusive education services.
- 6) However, in 2016 the LA made an assessment to restrict the 'Expression of Interest' DfE pilot of 'LA Presumption' Free School procurement to a newly developed plan (ie in a closed internal LA discussion) for a 72 place SEMH Free School, and did not agree to the SG Trust's proposal to include the 300 places of SEND new provision within the application. In the absence of an announced Wave



13 route for new special school places, or any noticeable lobbying of the DfE to secure a route to a sufficient capital programme, the Local Authority appears to be 'settling for less', by distributing the burden of over-numbers across the High Needs Block sector on a permanent and legally enforceable basis, through the proposals contained in this consultation. This is very regrettable and leads us to take the stance that we have in point 2 above.

- viii. I have had a number of representations from constituents concerning the lack of provision of specialist schools in Wharfedale for autistic children. I understand that the provision of such schools is currently under review. If this is the case, I should hope that Wharfedale is being considered as an area in need of further provision.



Appendix V

SEN Improvement Test

Ensuring the sufficiency of specialist places in Bradford maintained Special Schools and Academy Special Schools for children and young people with Special Educational Needs and Disabilities (SEND)

This document demonstrates how the proposals to improve our offer of Specialist Provision meet the requirements of the 'SEN Improvement Test.

Background Information

The Local Authority and Academies offer a range of educational provision across the Bradford District including Special schools, Pupil Referral Units (PRU's), Designated Specialist Provision (DSP's), Additionally Resourced Centres (ARC's), Mainstream schools and Academies.

These proposals will create additional specialist places across the maintained special and nursery schools and Academies which form part of:

- A coherent geographical spread of provision across the District
- A network of special schools
- Flexible and responsive provision

The expansion of special school and nursery school (EYESP) provision is based on the following principles:

- There is an urgent need for more specialist places in Bradford due to the increase in population
- Currently only 1% of Bradford's Special Educational Needs and Disabilities pupils are in special schools and there is a growing need for more specialist places to meet need and demand
- All children are to be valued equally, regardless of their ability, behaviour, family circumstances, ethnic origin, gender and sexual orientation
- All children are to be provided with the best learning opportunities, environment and experience which maximises their learning
- All children are entitled to a broad, balanced and relevant curriculum which is differentiated to meet individual needs
- Children's diverse special educational needs and disabilities require a range of flexible and varied provision



Currently the local authority maintains four special schools. Two for primary aged pupils and two for secondary aged pupils. In addition there is one primary academy, one all age (0-19) academy and two secondary academy special schools.

Currently the Local Authority maintains three Nursery Schools across the District which deliver integrated early years enhanced specialist provision for Children primarily aged 2 - 5 years alongside mainstream Nursery Schools places as part of the Children's Centre plus provision.

The SEN Improvement Test

When proposing to make changes to existing SEND Provision, Proposers have to meet the SEN Improvement Test and be able to demonstrate that the proposed arrangements are likely to lead to improvement in the standard, quality and/or range of educational provision for children with special educational needs and disabilities.

The required improvements of the test are as follows:

- Improved access to education and associated services including the curriculum, wider school activities, facilities and equipment with reference to the local authority's Accessibility Strategy
- Improved access to specialist staff, both education and other professionals, including external support and outreach services
- Improved access to suitable accommodation
- Improved supply of suitable places
- Confirmation from the school/s that they are willing to receive additional pupils with a range of special educational needs
- Confirmation of specific transport arrangements
- Confirmation of how the proposals will be funded and the planning for staffing arrangements that will be put in place

Confirmation of the requirements:

- **Improved access to education and associated services including the curriculum, wider school activities, facilities and equipment with reference to the local authority's Accessibility Strategy**



SEND and Behaviour Services will continue to meet the requirements of the Government's inclusion agenda. It will ensure a flexible continuum of provision for pupils with a range of special educational needs and disabilities, according to the needs of individual children and will take into account the provision specified in the child's Education Health and Care Plan (EHCP)/Statement of special educational needs and the wishes of the parent/carer.

Leadership and management will be provided by the school's/academies who will ensure that all resources are used efficiently and effectively in supporting children and young people with a range of special educational needs and disabilities. Partnership working with the District Achievement Partnership (DAP) will ensure the development of a cohesive, district wide approach to training needs across the district and improve capacity.

The specialist provision/s will be delivered across a number of school/academy sites. Pupils will be on the roll of the special and nursery school/s. There will be a focus on maximising inclusion with other pupils in the school, but the development of a cohort of pupils with a range of special educational needs and disabilities will ensure that pupils have access to a specific curriculum with their peers, appropriate to meet their needs.

The school will offer individual timetables for pupils to learn specific skills and there will be regular opportunities to take part in learning outside classroom activities, specifically adapted for the pupils. The accommodation will be staffed by fully trained and qualified teaching staff and teaching assistants with access to specialist support such as speech and language therapy.

The proposals will, therefore, lead to improved access to education and associated services including the curriculum and wider school activities while providing improved facilities and equipment.

The overall aims of Bradford's Accessibility Strategy and the way they will be met are as follows:

- Curriculum: Increasing the extent to which disabled pupils or prospective pupils can participate in the curriculum
 - These proposals will deliver advantages and improvements for the children and young people attending specialist provision as their access to the specialist facilities and support will be more easily facilitated within their local community
- Physicality: Improving the physical environment of schools/academies to increase the extent to which disabled pupils can take advantage of education and associated services
 - The schools/academies will undergo a refurbishment programme, which may include the addition of temporary buildings which is focussed on improving access and inclusion for all pupils at the schools/academies
 - There will be access to specialist health and therapy services



- Information: Improving the provision of information in a wide range of formats for disabled pupils
 - The new accommodation will develop as a hub providing information for children, parents/carers and professionals.

- **Improved access to specialist staff, both education and other professionals, including external support and outreach services**

Within the setting/s, the children and young people will enjoy the continued support of the full range of training and qualified specialist staff. They will also have access to trained teaching assistants and health and therapy service providers. Improved information routes and advice and support will be provided by the District Achievement Partnership (DAP) and will enable improved partnership working with professionals from other provisions.

The children will be able to access the curriculum according to their needs and abilities where they will be taught by qualified teachers and trained support staff. The staff will work in close co-operation and collaboration. Through economies of scale, the setting will also enable the pupils' easier access to a wide range of professionals within one setting.

The proposals will, therefore, ensure that children and young people with a range of special educational needs will continue to have high quality support from the full range of trained specialist staff. Their access to fully qualified and experienced teachers, teaching assistants and other professionals will be improved. Their opportunities will be further enhanced as the specialist staff will work more closely together, supporting each other and having access to targeted services.

- **Improved access to suitable accommodation**

The specialist accommodation for pupils with a range of special educational needs and disabilities, located at the various school and academy sites, will improve access to specialist accommodation and be fully fit for purpose.

- **Improved supply of suitable places**

Bradford has a strategic commitment to the development of a range of specialist provision. The purpose of this proposal is to move forward on delivering that commitment. Children and young people with a range of special educational needs and disabilities, with Education Health and Care Plans (EHCP's)/Statement of special educational need's, will have access to a range of specialist educational offers, including, local mainstream schools, mainstream school/s with access to specialist support and specialist designated provision with access to mainstream as appropriate and special schools, including academies.

This proposal increases current provision by providing additional Special School places



and additional Early Years Enhanced Specialist Provision (EYESP) places across the district's maintained and academy schools.

These proposals will create a district wide structure of special/nursery schools that reduces the need for pupils to travel long distances across the city, will provide a distribution of specialist provision for additional learning needs, will enable pupils to access a differentiated curriculum maximising the opportunities for inclusion, maintain a support network and target multi agency support.

- **Confirmation from the school that they are willing to receive additional pupils with a range of special educational needs**

The development of these proposals has been undertaken in consultation and partnership with all interested parties including Headteachers, staff, and parents/carers, Governing Bodies of the school/s and other relevant charities and voluntary organisations.

Preparations are now in place to consult widely on this proposal.

The schools and academies affected are all fully committed to ensuring they provide the best specialist provision and support for children and young people with a range of special educational needs and disabilities.

- **Confirmation of specific transport arrangements**

The current local authority Transport Policy for Special Educational Needs and disabilities will apply to all children and young people as it does currently.

- **Confirmation of how the proposals will be funded and the planning staffing arrangements put in place**

- All of the special/nursery schools and academy special schools will continue to be funded via the Place Plus Model, in accordance with the local determined funding formula for special educational needs pupils from the Dedicated Schools Grant (DSG).
- Place funding will be delegated to the special schools including academies for an agreed number of additional places.
- Additional plus funding from the High Needs Block will be paid in accordance with individual pupil needs (within the established 7 range funding model).

The school/s and Academies will be responsible for the appointment of suitably qualified staff to meet the individual needs of children and young people placed on roll of the special schools.



Appendix W

SEN Improvement Test

Proposals to Increase the number of Designated Specialist Provision places at maintained schools and academies, also increasing Pupil Referral Unit places for children and young people with Special Educational Needs and Disabilities (SEND)

This document demonstrates how the proposals to improve our offer of Specialist Provision meet the requirements of the 'SEN Improvement Test.

Background Information

The Local Authority and Academies offer a range of educational provision across the Bradford District including Special schools, Pupil Referral Units (PRU's), Designated Specialist Provision (DSP's), Additionally Resourced Centres (ARC's), Mainstream schools and Academies.

These proposals will expand and develop further specialist provision across maintained schools and academies to enhance the network of DSP's and PRU's which form part of:

- A coherent geographical spread of provision across the District
- A dynamic network
- Flexible and responsive provision

The development of Designated Specialist Provision and Pupil Referral Units is based on the following principles:

- All children are to be valued equally, regardless of their ability, behaviour, family circumstances, ethnic origin, gender and sexual orientation
- All children are to be provided with the best learning opportunities, environment and experience which maximises inclusion into mainstream classes
- All children are entitled to a broad, balanced and relevant curriculum which is differentiated to meet individual needs
- Children's diverse special educational needs and disabilities require a range of flexible and varied provision

There are a number of factors in determining the location of a new DSP/PRU:

- Geographical location to minimise travelling
- Current knowledge on existing pupil populations with additional learning needs
- The school/s and PRU's must have a demonstrable commitment to inclusion and support the principles of the DSP model from all of their communities including; staff, governors, pupils and parents
- The school/s and PRU's must be prepared to take part in whole school training as well as support specific training for individuals and groups



- The school/s and PRU's must be delivering high quality teaching and learning
- The leadership and management of the school/PRU must be good or better
- School/PRU buildings/accommodation must be suitable

Currently the local authority maintains six designated specialist provisions, three for primary aged pupils and three for secondary aged pupils. In addition there are four primary and eight secondary academies who also host designated specialist provisions.

Currently the local authority maintains 4 Pupil referral Units for children and young people with SEMH, one for primary aged pupils and three for secondary aged pupils

The SEN Improvement Test

When proposing to make changes to existing SEND Provision, Proposers have to meet the SEN Improvement Test and be able to demonstrate that the proposed arrangements are likely to lead to improvement in the standard, quality and/or range of educational provision for children with special educational needs and disabilities including social emotional and mental health needs (SEMH).

The required improvements of the test are as follows:

- Improved access to education and associated services including the curriculum, wider school activities, facilities and equipment with reference to the local authority's Accessibility Strategy
- Improved access to specialist staff, both education and other professionals, including external support and outreach services
- Improved access to suitable accommodation
- Improved supply of suitable places
- Confirmation from the school/s that they are willing to receive additional pupils with a range of special educational needs
- Confirmation of specific transport arrangements
- Confirmation of how the proposals will be funded and the planning for staffing arrangements that will be put in place

Confirmation of the requirements:



- **Improved access to education and associated services including the curriculum, wider school activities, facilities and equipment with reference to the local authority's Accessibility Strategy**

SEND and Behaviour Services will continue to meet the requirements of the Government's inclusion agenda. It will ensure a flexible continuum of provision for pupils with a range of special educational needs and disabilities, according to the needs of individual children and will take into account the provision specified in the child's Education Health and Care Plan (EHCP)/Statement of special educational needs and the wishes of the parent/carer.

Leadership and management will be provided by the school's/academies/PRU's who will ensure that all resources are used efficiently and effectively in supporting children and young people with a range of special educational needs and disabilities. Partnership working with the DSP and PRU Network will ensure the development of a cohesive, district wide approach to training needs across the district and improve capacity.

The specialist provision/s will be delivered across a number of school/academy/PRU sites. Pupils will be on the roll of the mainstream school/academy or PRU. There will be a focus on maximising inclusion with other pupils in the school, but the development of a cohort of pupils with a range of special educational needs and disabilities will ensure that pupils have access to a specific curriculum with their peers, appropriate to meet their needs. The school/academy/PRU will offer individual timetables for pupils to learn specific skills and there will be regular opportunities to take part in learning outside classroom activities, specifically adapted for the pupils. The accommodation will be staffed by fully trained and qualified teaching staff and teaching assistants with access to specialist support such as speech and language therapy.

The proposals will, therefore, lead to improved access to education and associated services including the curriculum and wider school activities while providing improved facilities and equipment.

The overall aims of Bradford's Accessibility Strategy and the way they will be met are as follows:

- Curriculum: Increasing the extent to which disabled pupils or prospective pupils can participate in the curriculum
 - These proposals will deliver advantages and improvements for the children and young people attending specialist provision as their access to the specialist facilities and support will be more easily facilitated within their local community
- Physicality: Improving the physical environment of schools/academies/PRU's to increase the extent to which disabled pupils can take advantage of education and associated services



- The schools/academies/PRU's will undergo a refurbishment programme, which may include the addition of temporary buildings which is focussed on improving access and inclusion for all pupils at the schools/academies/PRU's
- There will be access to specialist health and therapy services
- Information: Improving the provision of information in a wide range of formats for disabled pupils
 - The new accommodation will develop as a hub providing information for children, parents/carers and professionals.
- **Improved access to specialist staff, both education and other professionals, including external support and outreach services**

Within the setting/s, the children and young people will enjoy the continued support of the full range of training and qualified specialist staff. They will also have access to trained teaching assistants and health and therapy service providers. Improved information routes and advice and support will be provided by the DSP/PRU Network and will enable improved partnership working with professionals from other provisions across the district.

The children will be able to access the curriculum according to their needs and abilities, where they will be taught by qualified teachers and trained support staff. The staff will work in close co-operation and collaboration. Through economies of scale, the setting will also enable the pupils' easier access to a wide range of professionals within one setting.

The proposals will, therefore, ensure that children and young people with a range of special educational needs and disabilities will continue to have high quality support from the full range of trained specialist staff. Their access to fully qualified and experienced teachers, teaching assistants and other professionals will be improved. Their opportunities will be further enhanced as the specialist staff will work more closely together, supporting each other and having access to targeted services.

- **Improved access to suitable accommodation**

The specialist accommodation for pupils with a range of special educational needs and disabilities, located at the various school/academy/PRU sites, will improve access to specialist accommodation and be fully fit for purpose.

- **Improved supply of suitable places**

Bradford has a strategic commitment to the development of a range of specialist provision. The purpose of this proposal is to move forward on delivering that commitment. Children and young people with a range of special educational needs and disabilities, with



Education Health and Care Plans (EHCP's)/Statement of special educational need's, will have access to a range of specialist educational offers, including, local mainstream schools, mainstream school/s with access to specialist support and specialist designated provision with access to mainstream as appropriate and special schools, including academies and PRU's.

This proposal increases current provision by providing additional designated specialist provision in maintained and academy schools and increasing Pupil Referral Unit places across the district.

These proposals will create a district wide structure of designated specialist provision and Pupil Referral Units that reduces the need for pupils to travel long distances across the city. It will also provide a distribution of specialist provision for additional learning needs including social emotional and mental health needs, which will enable pupils to access a differentiated curriculum maximising the opportunities for inclusion, maintain a support network and target multi agency support.

- **Confirmation from the school/s that they are willing to receive additional pupils with a range of special educational needs**

The development of these proposals has been undertaken in consultation and partnership with all interested parties including Headteachers, staff, and parents/carers, Governing Bodies of the school/s and other relevant charities and voluntary organisations.

Preparations are now in place to consult more widely on these proposals.

The schools/academies and PRU's affected are all fully committed to ensuring they provide the best specialist provision and support for children and young people with a range of special educational needs and disabilities.

- **Confirmation of specific transport arrangements**

The current local authority Transport Policy for Special Educational Needs and disabilities will apply to all children and young people as it does currently.

- **Confirmation of how the proposals will be funded and the planning staffing arrangements put in place**

- All of the schools/academies and PRU's will continue to be funded via the Place Plus Model, in accordance with the local determined funding formula for special educational needs pupils from the Dedicated Schools Grant (DSG).



- Place funding will be delegated to the schools/academies/PRU's for an agreed number of additional places.
- Additional plus funding from the High Needs Block will be paid in accordance with individual pupil needs (within the established 7 range funding model).

The school/s, academies and PRU's will be responsible for the appointment of suitably qualified staff to meet the individual needs of children and young people placed in the designated specialist provision.



Appendix X

Equality Impact Assessment Form

Reference –

Department	Children' s Services Education Employment & Skills	Version no	V1.5
Assessed by	Emma Hamer	Date created	26/10/2017
Approved by	Angela Spencer-Brooke	Date approved	09/11/2017
Updated by	Emma Hamer	Date updated	12/11/2017
Final approval	Judith Kirk	Date signed off	14/11/2017

The Equality Act 2010 requires the Council to have due regard to the need to

- eliminate unlawful discrimination, harassment and victimisation;
- advance equality of opportunity between different groups; and
- foster good relations between different groups

Section 1: What is being assessed?

1.1 Name of proposal to be assessed.

Increasing Specialist Provision for children and young people with special educational needs and disabilities (SEND) by:

- Increasing specialist places for children and young people with SEND at Bradford's Special Schools, including Academies
- Developing and Increasing specialist places in Designated Specialist Provision (DSP) in maintained schools and academies and Pupil Referral Units (PRU) for children and young people with a range of SEND
- Increasing Early Years Enhanced Specialist Provision (EYESP) places for young children across four maintained nursery schools

1.2 Describe the proposal under assessment and what change it would result in if implemented.

The Local Authority is proposing to increase the number of places for pupils in the following maintained Special Schools with effect from April to September 2018:



- Chellow Heights School – 48 additional places proposed by April 2018
- Delius School – 24 additional places - proposed by September 2018
- Beechcliffe School – 30 additional places - proposed by April 2018
- Oastlers School – 14 additional places - proposed by April 2018

The following Academies are proposing to increase the number of places for pupils in the following Academy Special Schools with effect from April to September 2018:

- The Phoenix School – 22 additional places proposed by September 2018
- Hazelbeck School – 8 additional places proposed by April 2018
- Southfield School – 32 additional places (inc. 12 EDSP places) proposed by April 2018
- High Park School – 12 additional places proposed by April 2018

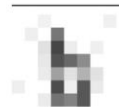
The Local Authority is proposing to increase the number of Designated Specialist Provision places for pupils in maintained schools with effect from April to September 2018 by:

- Developing new provision for primary aged children and young people with communication and interaction needs including autistic spectrum disorders (ASD) at:
 - Crossley Hall Primary School – 12 places proposed by September 2018
- Expanding the existing provision for primary aged children and young people with communication and interactions including autistic spectrum conditions (ASD) at:
 - Crossflatts Primary School from 12 places to 16 places proposed by April 2018
- Expanding the existing provision for secondary aged children and young people with communication and interactions including autistic spectrum conditions (ASD) at:
 - Holy Family Catholic School from 12 places to 16 places proposed by April 2018
- Expanding the existing provision for secondary aged children and young people with cognition and learning needs at:
 - Titus Salt School from 16 places to 30 places proposed by April 2018
- Developing new provision for primary aged children and young people with social emotional and mental health needs (SEMH) at:
 - Long Lee Primary School – 10 places proposed by April 2018
 - Cottingley Village Primary School – 10 places by April 2018

The Local Authority is proposing to increase the number of Pupil Referral Unit places for pupils with effect from April to September 2018 by:

- Expanding the existing provision for secondary aged children and young people with social emotional and mental health needs (SEMH) at:
 - Ellar Carr Pupil Referral Unit (PRU) from 36 places to 70 places proposed by April 2018

The following Academies are proposing to increase the number of Designated Specialist Provision places with effect from April to September 2018 by:



Developing new provision for primary aged children and young people with communication and interaction needs including autistic spectrum disorders (ASD) at:

- Green Lane Primary School – 12 places proposed by September 2018
- Worth Valley Primary Academy – 8 places proposed by April 2018

Expanding the existing provision for primary aged children and young people with speech language and communication needs (SLCN) at:

- Green Lane Primary School from 9 places to 12 places proposed by April 2018

The Local Authority is proposing to increase the number of Early Years Enhanced Specialist Provision places for pupils in Bradford’s maintained Nursery Schools by:

3. Increasing the number of Early Years Enhanced Specialist Provision places at:

- Strong Close Nursery School
- St. Edmunds Nursery School
- Canterbury Nursery School

4. Developing new Early Years Enhanced Specialist Provision at:

- Abbey Green Nursery School

These proposals set out to increase provision across the District, by creating an additional 28 x 0.6 Early Years Enhances Specialist Provision places for children aged 2 – 5 years but with capacity for some children aged 5+ where appropriate with a range of special educational needs and disabilities.

Section 2: What the impact of the proposal is likely to be

2.1 Will this proposal advance equality of opportunity for people who share a protected characteristic and/or foster good relations between people who share a protected characteristic and those that do not? If yes, please explain further.

These proposals will expand and develop further specialist provision to enhance the network of Special Schools, DSP’s, PRU’s and Nursery Schools (EYESP’s) which form part of:

- A coherent geographical spread of provision across the District
- A dynamic network
- Flexible and responsive provision

These proposals are intended to advance the equality of opportunity and a range of improved outcomes for children and young people with a full range of Special Educational Needs and Disabilities (SEND) by creating additional specialist places:

The proposals will lead to an additional:

- 190 Special School places



- 77 Designated Specialist Provision places
- 20 Pupil Referral Unit places
- 28 x 0.6 Early Years Enhanced Specialist Provision places

The Local Authority undertook a SEND Strategic Review 2016-2020 to ensure the sufficiency of specialist places for children and young people with SEND and Behaviour. The review found:

- There is an urgent need for more specialist places in Bradford due to the increase in population
- Currently only 1% of Bradford's SEND pupils are in special schools and there is a growing need for more specialist places to meet need and demand

The development of additional specialist places is based on the following principles:

- All children to be valued equally, regardless of their ability, behaviour, family circumstances, ethnic origin, gender and sexual orientation
- All children are to be provided with the best learning opportunities, environment and experience which maximises inclusion into mainstream classes where appropriate
- All children are entitled to a broad, balanced and relevant curriculum which is differentiated to meet individual needs
- Children's diverse special educational needs require a range of flexible and varied provision
- All children are to be valued equally, regardless of their ability, behaviour, family circumstances, ethnic origin, gender and sexual orientation
- All children are to be provided with the best learning opportunities, environment and experience which maximises their learning
- All children are entitled to a broad, balanced and relevant curriculum which is differentiated to meet individual needs
- Children's diverse special educational needs and disabilities require a range of flexible and varied provision

2.2 Will this proposal have a positive impact and help to eliminate discrimination and harassment against, or the victimisation of people who share a protected characteristic? If yes, please explain further.

Yes – by providing and expanding additional specialist places for children and young people with SEND alongside their mainstream peers where appropriate, this will help to eliminate discrimination and harassment by fostering a greater understanding of each other's needs, and through early identification, assessment and intervention using specialists and high quality practitioners improve outcomes for all children with SEND.

2.3 Will this proposal potentially have a negative or disproportionate impact on people who share a protected characteristic? If yes, please explain further.

No - The equality impact assessment indicates that these proposals are likely to have no impact and that there is no disproportionate impact on any group who share protected characteristics.



Children and Young People with SEND, including social emotional and mental health needs (SEMH) will be predominantly affected by these proposals. However the focus of the proposals will be on providing additional specialist places for children and young people with SEND, therefore any impact on protected characteristics will be minimal.

Other changes within SEND Services not included in this EIA that may impact on children and young people with SEND are; The SEND Transformation and The Prevention and Early Help changes.

2.4 Please indicate the level of negative impact on each of the protected characteristics?

(Please indicate high (H), medium (M), low (L), no effect (N) for each)

Protected Characteristics:	Impact (H, M, L, N)
Age	N
Disability	N
Gender reassignment	N
Race	N
Religion/Belief	N
Pregnancy and maternity	N
Sexual Orientation	N
Sex	N
Marriage and civil partnership	N
Additional Consideration:	
Low income/low wage	N

2.5 How could the disproportionate negative impacts be mitigated or eliminated?

(Note: Legislation and best practice require mitigations to be considered, but need only be put in place if it is possible.)

The Local Authority and strategic partners have made significant efforts to mitigate against any negative impacts and will continue to promote the move to a school-led system; whilst continuing to use High Needs Block funding to intervene early and use it effectively to improve outcomes for Children and Young people with SEND.

Council officers continue to play an important role to support the changes.

In order to manage any negative effects, the proposals will be implemented using a phased approach, so any risks can be identified.



We are carrying out extensive consultation with all interested parties, to ensure we capture all the identifiable risks.

We will further review the potential impact on protected characteristics as part of the development of the delivery programme.

Section 3: Dependencies from other proposals

3.1 Please consider which other services would need to know about your proposal and the impacts you have identified. Identify below which services you have consulted, and any consequent additional equality impacts that have been identified.

There has been considerable analysis undertaken to identify the need for increasing and developing specialist provision places for children and young people across the district. We have assessed the optimal location of the proposed provisions. Part of this work has been considering the need and also the availability of suitable accommodation.

The initial consultation period commences on 16th November and will run for 4 weeks until 14th December. The Local Authority is carrying out the consultation process on behalf on the academies.

We are consulting with all interested parties, please see below:

- Parents/Carers
- School staff and Governors
- Bradford and Airedale Parents Forum
- Bradford and Airedale NHS Trusts/CCG's
- Elected members
- Local MPs
- Trade Unions
- Neighbouring Authorities
- SENDIASS - Barnado's
- Parish & Mosque Councils
- Muslim Association
- CoE and Catholic Diocese for Bradford/Leeds
- Relevant charities and voluntary organisations
- Any other interested parties

The additional SEND places have been commissioned by the School's Forum and will be funded from the High Needs Block.

Section 4: What evidence you have used?

4.1 What evidence do you hold to back up this assessment?

The proposals have all been informed by the extensive evidence and analysis from a range of sources:

- Bradford SEND Strategic Review 2016-2020



- Bradford SEND Needs Assessment 2015 (in depth report) and updated Joint Strategic Needs Assessment (JSNA) SEND chapter (2017) and related documents
- Strategic aims and objectives set out in related strategies and plans and initiatives including the Education and School Improvement plan
- The Children and Families Act 2014 and the SEND 0-25 Code of Practice 2014
- Bradford District Education Organisational Plan
- Analysis of the number of children and young people going out of authority
- The commissioning of 360 additional places by Schools Forum

Extensive evidence and data has been used including identifying the incidence of SEND across the district; by type, the number of referrals received, the type of referrals, the age of the children and young people, the type of special educational needs and disabilities, and the number and geographical spread of Education and Health Care Plan assessments.

To note:

- We have a growing population of children and young people in Bradford and proportionally have a growing population of children and young people with SEND;
- There is an urgent need for more specialist places in Bradford due to the increase in population
- The complexity of special needs in Bradford is increasing - as a result there is a need for more specialist places.
- Bradford is a highly inclusive Local Authority as currently only 1% of Bradford's Special Educational Needs and Disabilities pupils are in special schools and there is a growing need for more specialist places to meet need and demand
- Nearly 50% of all our monthly referrals for an Education, Health and Care Assessment are for children 0-7
- We are working in a challenging and changing landscape both financially and educationally.

These proposals will continue to make a range of specialist provision available across the District to ensure the needs of all children and young people in Bradford can be met.

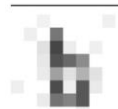
4.2 Do you need further evidence?

Before the Local Authority can increase provision in maintained schools, there is a statutory process that we must follow. Whenever the Local Authority proposes to increase places or make changes to specialist provision, all interested parties who are likely to be affected by the Councils proposals must be consulted in the development of the proposals prior to publication of statutory notices.

In relation to the academies proposals, the academies will consider the responses to the consultation and decide whether to submit a proposal for change and full business case to the Regional Schools Commissioner for permission in relation to their proposals.

A timeline for completing the consultation and statutory processes is set out below:

Activity	Timescales
Consultation period for maintained schools and academies begins	16 th November 2017



Consultation period for maintained schools and academies ends	14 th December 2017
For maintained schools the Director of Children's Services considers consultation responses and decides whether to publish statutory notices	14 th to 21 st December 2017
Academies consider the consultation responses and write Business Cases	14 th to 22 nd December 2017
Statutory notices published in the local newspapers (Consultation period begins)	4 th January 2018
Academies submit their full Business Cases to the DfE and RSC	4 th January 2017
End of 4 week Statutory Consultation period	1 st February 2018
Academies receive confirmation of approval from the DfE and RSC	January to March 2018
Report to Council Executive to consider the outcome of consultation and statutory notices and determine proposals (maintained schools only)	6 th March 2018
Proposed implementation date	April to September 2018

The report that will be presented to Council Executive on the 6th March 2018 will detail all the consultation responses received.

Section 5: Consultation Feedback

5.1 Results from any previous consultations prior to the proposal development.

The SEND Strategic Review 2016-2020 highlighted the need for additional specialist places across the district. The location of the places, was based on the following principles backed by the postcode and electoral ward data referred to in 4.1

Principles:

Children and Young People with a range of Special Educational Needs and Disabilities will continue to be well served in Bradford. The council is looking at the best way to offer a full range of provision locally for all children. We believe that a flexible district wide model will be able to respond effectively to local changes in demand.

The proposed changes will ensure the continued delivery of high quality and cost effective provision for the Children and Young People of Bradford.

The Council intend to have a District wide structure of Specialist Places across a number of settings that will:

- Provide local specialist places, reducing the need for pupils to travel long distances across the District
- Provide an equitable distribution of specialist places for children and young people with special educational needs and disabilities
- Provide increased access to the curriculum; both social and academic will be increased due to the staffing experience and capacity of the provisions. It will be possible to individually differentiate and support the work and potential of each individual pupil



- Provide an increased level of available support to all pupils and will give the greatest opportunity to increase inclusion
- Provide an improved support network, especially related to training that will support and develop the proposals
- Extend and target multi-agency support into the specialist provisions, especially from the health authority and more specifically speech and language therapy
- Provide a progression pathway from Primary phase to Secondary phase

5.2 The departmental feedback you provided on the previous consultation (as at 5.1).

All interested parties, including parents/carers, Headteachers/school staff and council officers recognise the urgent need for more specialist places and the Schools Forum has agreed to fund an additional 360 places from the High Needs block.

5.3 Feedback from current consultation following the proposal development (e.g. following approval by Executive for budget consultation).

Please refer to 4.2 for details of the consultation timeline.

As a result of the initial and statutory consultation processes any changes required to the proposals will result in an updated EIA being produced if necessary.

5.4 Your departmental response to the feedback on the current consultation (as at 5.3) – include any changes made to the proposal as a result of the feedback.

Feedback from all interested parties will be used to refine the proposals. However, in general the feedback received to date has been very supportive of the proposals to increase and develop additional specialist places for children and young people with SEND.

We will share the report following publication of the Statutory Notices and a further statutory consultation period with the Council Executive on 6th March 2018 for their approval. We are committed to on-going dialogue with all interested parties on the delivery of the proposals.



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Report of the Assistant Director of Finance and Procurement to the meeting of the Executive Board to be held on 3rdth April 2018.

Subject:

BL

Quarter 4 Finance Position Statement for 2017-18

Summary statement:

This report provides Members with an overview of the forecast financial position of the Council for 2017-18.

It examines the latest spend against revenue and capital budgets and forecasts the financial position at the year end. It states the Council's current balances and reserves and forecasts school balances for the year.

Andrew Crookham
Assistant Director – Finance &
Procurement

Portfolio:

Leader of the Council and Corporate

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**Overview & Scrutiny Area:
Corporate**

Qtr. 4 FINANCIAL STATEMENT FOR 2017-18

1.0 INTRODUCTION

This report is the fourth monitoring report presented to Members on the Council's 2017-18 financial position. It provides an early indication of the revenue and capital financial position of the Council at the 31st March 2018.

The report covers

- The forecast outturn of the Council's revenue budget including management mitigations where issues have been identified.
- The delivery of 2017-18 approved budget savings plan, and progress on the Transformation Fund allocated to projects that help deliver savings and transform services.
- A statement on the Council's reserves including movements in the 4th quarter.
- An update on the Capital Investment Plan.
- An update on Council Tax and Business Rates Collection.

1.1. MAIN FINANCIAL MESSAGES

- Based on a projection at 28th February 2018, it is forecast that Council wide expenditure will be £0.3m below the approved budget of £375.2m by year end. This is a £0.9m improvement from the position at Qtr. 3 resulting from;
 - A £1.2m increase in the Centrally Held budgets underspend to £9.6m due to lower capital financing costs as result of lower capital expenditure and lower borrowing costs.
 - A £0.6m increase in the Corporate Resources underspend to £2.9m due mainly to further small scale improvements in Revenues and Benefits, and Estates and Property.
 - A £0.2m reduction in the Children's Services overspend to £3.7m.
- The above improvements to the financial position are however partly offset by;
 - A £0.5m increase in the Health and Wellbeing overspend to £6.9m primarily due to increased Direct Payment and Home Care costs.
 - A £0.3m increase in the Department of Place overspend to £1.9m largely due to a further £0.6m increase in in Waste Services overspend to £1.7m, partly offset by a £0.2m improvement in Sports and Culture an £0.1m improvement in Fleet Services.
 - A £0.3m reduction in the Non-Service forecast underspend to £0.3m linked to lower interest and investment income.
- Although the Council is forecast to underspend overall, there are still significant overspends in Health and Wellbeing (£6.9m) and Children's Services (£3.7m) linked

to Social Care demand pressures which is a national issue.

- It should also be noted that the £6.9m forecast overspend in Health and Wellbeing is after using £10.4m of time limited 'Improved Better Care Fund'¹ (IBCF) money and £0.7m of one-off reserves, without which the forecast overspend would have been significantly higher. The IBCF is being used as outlined in the Integration and Better Care Fund delivery plan that has been agreed by the Health and Wellbeing Board and NHS England.
- The Department of Place is also forecast to overspend by £1.9m linked to Waste Services (£1.7m), Planning Transport and Highways (£0.9m); Sports and Culture (£0.8m), partly offset by underspends in Neighbourhood Services (£1.1m) and Economic Development (£0.2m).
- The overspend in Health and Wellbeing, Children's Services and Department of Place outlined above, are partly offset by underspends in Corporate Resources (£2.9m), Non-Service (£0.3m) and Central budgets and net transfers to reserves (£9.6m). The underspend in Centrally held budgets is mostly due to lower capital financing and redundancy costs than budgeted.
- Regarding the £46m² budgeted savings programme, there are risks to the achievement of a number of plans, and it is forecast that £23.5m of savings will not be delivered as intended. The forecast underachievement is significantly higher than prior years reflecting the increased difficulty in delivering savings as the Council reduces in size, and lower priority areas have already been cut.
- One of the aims of this report is to highlight risks of under delivery, as any underachieved savings from 2017-18 and prior years will compound the difficulty of delivering future year savings and this is the main issue highlighted by this report.
- Given the level of forecast underachieved savings highlighted in prior reports, and the potential impact on 2018-19, the Leader of the Council determined that a formal group ("Star Chamber") inclusive of the Leader, Deputy Leader, Chief Executive and Strategic Director of Corporate Services, should meet with the Portfolio Holders and Strategic Directors of Health and Wellbeing, Children's Services and Place to suggest ways in which the budget proposals could be bought back on track or mitigated.
- The 2018-19 budget has sought to address a number of underachieved savings. Of the £23.5m of savings that are forecast not to be delivered in year, £14.4m has been addressed through the 2018-19 budget. Of this, £4.4m has been identified as not deliverable, with the remainder re-profiled to reflect a longer implementation period. Additionally, the £4.8m of Travel Assistance savings, will continue to be mitigated by Corporate contingencies until delivery plans are finalised. The impact of the 2018-19 budget is outlined in Section 4 - Service Commentaries.
- Regarding reserves, at 28th February 2018 reserves stand at £126.1m (Council £100.9m and Schools £25.2m). Net movements from reserves have led to a £26.9m reduction in total reserves from £153.0m at 1 April 2017. Section 6 details reserves.

¹ £10.4m of IBCF has been received in 2017-18. The additional money received will reduce to £6.2m in 2018-19, £3.5m in 2019-20 and £0 by 2020-21.

² £37.5m of 2017-18 budget savings + £8.5m of budget savings not achieved in prior years

- Unallocated reserves required for contingency purposes, now stand at £14.5m. This is equivalent to just 1.7% of the Council's gross budget excluding schools.
- Schools reserves are forecast to reduce from £25.2m at the start of the year to £13.5m by year end. £5.4m of the £11.7m forecast reduction is linked to Schools converting to Academies, with the remaining £6.3m used in support of the 2017-18 Schools Budget, including where schools are forecasting to spend a proportion of the balances they held at March 2017. Section 5.2 outlines School Balances.
- Regarding Capital Expenditure, the profiled resource position for 2017-18 for the Capital Investment Plan (CIP) stands at £71.8m with £61.8m incurred at 28th February.
- Regarding Council Tax and Business Rates, the Council will receive the 2017-18 budgeted shares of Council Tax and Business Rates. Any variance between the budget and the outturn is carried forward into 2018-19, so only impacts on next financial year. It is currently forecast that Council Tax will be approximately £0.4m below budget, and Business Rates £0.7m below budget. These will be carried forward into 2018-19 and have been accounted for in the 2018-19 Council budget.
- By 31st January 2018 the Council had collected £172.4m (83.9%) of the value of Council Tax bills for the year compared with £162.2m (83.5%) at the same stage last year. The collection of Business Rates by 31st January was £124.1m (86.9%) compared to £129.3m (85.6%) at the same time last year.

2. COUNCIL REVENUE FORECAST

2.1 2017-18 Revenue Budget

The Council is forecast to underspend the £375.2m net revenue budget by £0.3m.

- Table 1a shows the financial position of the Council by department to reflect that budgetary responsibility lies with the individual departmental management teams.

Table 1a – Revenue forecast by department

	Budget			Forecast			Variance		
	£m	£m	£m	£m	£m	£m	£m	£m	£m
Health and Wellbeing	220.9	228.9	8.0	-106.2	-107.3	-1.1	114.7	121.6	6.9
Children's Services	484.8	489.7	4.9	-388.7	-390.0	-1.2	96.1	99.7	3.7
Department of Place	141.0	142.3	1.4	-56.8	-56.2	0.6	84.2	86.1	1.9
Corporate Services	270.7	266.0	-4.6	-223.5	-221.7	1.8	47.2	44.3	-2.9
Chief Executive	3.9	3.9	0.1	-0.1	-0.1	-0.0	3.8	3.8	0.0
Non Service Budgets	7.2	6.7	-0.6	-1.3	-1.0	0.3	5.9	5.6	-0.3
Central Budgets & Net Transfers To Reserves	50.0	35.6	-14.4	-26.6	-21.8	4.8	23.4	13.8	-9.6
Total Council Spend	1,178.4	1,173.1	-5.3	-803.3	-798.2	5.1	375.2	374.9	-0.3

- Table 1b shows the income and expenditure of the Council by priority outcome which reflect the alignment of resources with the priorities of the Council and the District as set out in the respective Council and District Plans. In essence the activities the Council undertake contribute to the delivery of the outcomes.

Table 1b – Revenue forecast by Council Plan Outcomes

	Gross expenditure			Income			Net expenditure		
	Budget £m	Forecast £m	Variance £m	Budget £m	Forecast £m	Variance £m	Budget £m	Forecast £m	Variance £m
Council Plan Outcomes									
Better Health Better Lives	449.2	462.7	13.5	-272.4	-273.9	-1.5	176.8	188.8	12.0
Better Skills, More Good Jobs And A Growing Economy	109.4	108.8	-0.7	-49.1	-48.6	0.5	60.4	60.1	-0.2
Safe, Clean And Active Communities	65.7	65.8	0.1	-23.3	-22.4	0.9	42.4	43.4	1.0
A Great Start And Good Schools For All Our Children	426.0	425.3	-0.7	-393.2	-394.0	-0.8	32.8	31.3	-1.4
Decent Homes That People Can Afford To Live In	5.8	5.8	-	-2.5	-2.5	-	3.2	3.2	-
A Well Run Council	90.3	87.2	-3.1	-32.6	-31.4	1.2	57.8	55.8	-1.9
Non Service, Fixed and Unallocated	32.1	17.7	-14.5	-30.2	-25.4	4.8	1.9	-7.8	-9.7
Total Council Spend	1,178.4	1,173.1	-5.3	-803.3	-798.2	5.1	375.2	374.9	-0.3

3.1 Delivery of Budgeted Savings proposals

- The combined budget savings of £36.5m in 2017-18³, and a further £1.1m Government cut to the Public Health Grant brings the total budget savings the Council has had to find in the seven years following the 2010 Comprehensive Spending Review (CSR) to £255.8m.

Table 2 Year on Year savings since 2010 CSR

	£m
2011-12	48.7
2012-13	28.5
2013-14	26.1
2014-15	31.8
2015-16	37.7
2016-17	45.6
2017-18	37.5
Total savings	255.8

- The 2017-18 budget includes £37.5m of new budget reductions, however £8.5m of prior year savings were not delivered as planned in 2016-17, meaning that £46.0m of savings are budgeted to be delivered in 2017-18.
- In tracking progress made against each individual saving proposal, £22.6m (49%) of the £46m is forecast to be delivered, leaving £23.5m that is forecast not to be delivered. This is largely the same as reported at Qtrs. 2 and 3.

Table 3 Saving Tracker

	Prior year underachieved Savings outstanding at 31/3/17 £m	2017-18 New Savings £m	Total Savings 2017-18 £m	Qtr. 4 Variance-Year £m
Health & Wellbeing	1.9	21.6	23.6	14.2
Children's Services	1.4	3.9	5.3	3.1
Place	0.4	5.8	6.1	1.4
Corporate	0.0	5.6	5.6	0.0
Corporate (CEO)	0.0	0.5	0.5	0.0
Non Service Budgets & Cross Cutting	0.0	0.0	0.0	0.0
Travel Assistance	4.8	0.0	4.8	4.8
Total	8.5⁴	37.5	46.0	23.5

- The forecast underachievement is higher than prior years reflecting the increased difficulty of delivering savings.

Table 4	Underachieved Savings £ms
2013-14	4.4
2014-15	2.3
2015-16	4.9
2016-17	7.9
2017-18	23.5 (forecast)

³ £24.3m of 2016-17 budget decisions to be delivered in 2017-18, less £1.1m amendments approved in Feb 2017, plus £13.3m of new budget savings approved in Feb 2017.

⁴ Underachieved savings from prior years include the value of underachieved savings from 2016-17 and 2015-16 that were not achieved by 31/3/2017.

- The planned savings that are at risk of not being delivered in full are outlined in greater detail in Section 4 - Service Commentaries, and are provided in full in Appendix 1.
- One of the aims of this report is to highlight risks of under delivery, as any underachieved savings from 2017-18 and prior years will compound the difficulty of delivering future year savings and this is the main issue highlighted by this report.
- The 2018-19 budget has sought to address a number of underachieved savings. Of the £23.5m of savings that are forecast not to be delivered in year, £14.4m has been factored into the 2018-19 budget. Of this, £4.4m has been identified as not deliverable, with the remainder re-profiled to reflect a longer implementation period. Additionally, the £4.8m of Travel Assistance savings, will continue to be mitigated by Corporate contingencies until delivery plans are finalised.
- The savings that will either be reprofiled or have been assessed to be undeliverable are outlined below. Alternate budget savings have been identified and these are outlined in Council report - The Council's Revenue Estimates for 2018-19, approved on February 22nd, and outlined in Section 4 – Service Commentaries, of this report.

Ref	Description	Prior Year Savings	2018-19	2019-20	2020-21
		£'000	£'000	£'000	£'000
3A2	Changes to Home Care Services	1,500	0	0	0
3A6	Changes to Learning Disability day care and procurement	1,000	0	-1,000	0
3A10	Changes to contracts for Learning Disability residential and nursing	1,000	0	-1,000	0
4A1	Adults Demand management	8,000	0	0	-8,000
3C7	Reducing the cost of high cost placements – Children's Social Care	1,039	250	0	0
3C8	Reducing the number of looked after children by 75	815	0	0	0
4C4	Child Protection Management restructure	60	240	0	0
4C9	Disabled Children – reduce staffing on CAMHS and reduce budget by 1%	0	34	0	0
4C10	Review Team – review budget and reduce by 2% in 2018/19	0	24	0	0
4C14	Reducing agency spend in Children's Social Care	1,025	36	0	0
4C15	Review of front door customer contact	0	46	0	0
4R4	UTC Centralisation	0	246	0	0
4H2	Revised terms and conditions	0	280	210	210
4L1	Legal and Democratic Services –reductions to Civic, Legal and Committee Services, including Overview and Scrutiny are proposed	0	15	15	0
4R2	WYCA Levy	0	968	250	250
Total		14,439	2,139	1,525	7,540

+ = saving added back (budget increase, - = saving reprofiled to future year (budget decrease)

3.2 Transformation Fund Progress

- In setting the 2017-18 and 2018 -19 budget in February 2017, the Council agreed to create a £5m Transformation Fund to support change and help deliver budget savings. The Council Plan Delivery Board has agreed the following allocations from the Transformation Fund.

Outcome	Number of Projects	2017-18 £000	2018-19 £000	2019-20 £000	Total Allocation £000	Total 2017-18 Spend Forecast £000
Better Health Better Lives	6	1,392	50	0	1,442	231
Better Skills, More Jobs	5	374	314	50	738	120
Safe , Clean and Active	2	40	20	0	60	10
A Great Start and Good Schools	3	245	120	20	385	97
Decent Homes	1	100	0	0	100	100
A Well Run Council	4	895	440	440	1,775	255
Total	21	3,046	944	510	4,500	843

- The remaining £0.5m is currently being held as a Challenge Fund for innovation projects.
- Lead in times of setting up projects and recruitment delays has resulted in the 2017-18 forecast spend of £843k being below the £3.046m allocated for the year. The unspent allocations from 2017-18 will be rolled forward into 2018-19.

4. SERVICE COMMENTARIES

4.1 Health and Wellbeing

Health & Wellbeing	Gross expenditure			Income			Net expenditure		
	Budget £m	Forecast £m	Variance £m	Budget £m	Forecast £m	Variance £m	Budget £m	Forecast £m	Variance £m
Operational Services	161.9	171.6	9.7	-59.7	-60.6	-0.9	102.2	111.0	8.8
Integration & Transition	12.5	12.2	-0.3	-1.9	-2.0	-0.1	10.6	10.2	-0.4
Strategic Director	0.9	-0.4	-1.2	-0.4	-0.4	-0.0	0.5	-0.8	-1.2
Public Health	45.6	45.4	-0.2	-44.2	-44.3	-0.0	1.4	1.2	-0.2
Total	220.9	228.9	8.0	-106.2	-107.3	-1.1	114.7	121.6	6.9

- The Department of Health and Wellbeing which comprises Adult Social Care and Public Health is forecast to overspend the £114.7m net expenditure budget by £6.9m (£6.4m at Qtr. 3).
- The forecast comprises £14.2m of underachievement against the £23.6m budgeted savings; further demand and cost pressures of £5.7m within the Adult Social Care Purchased Care budget and other pressures across the department of £0.9m.
- These are partly offset by time limited Improved Better Care Fund (IBCF) money of £10.4m; the utilisation of £0.7m of one off reserves, £1.8m of compensating underspends across the department and re-directed Public Health funding of £1m. The IBCF is being used as outlined in the Integration and Better Care Fund delivery plan this has been agreed by the Health and Wellbeing Board and NHS England.

Adult Social Care

- Adults Social Care⁵ is forecast to overspend by £7.1m, a £0.5m adverse movement from Qtr. 3 primarily due to winter pressures and an increase in Direct Payment activity (£0.3m) and Learning Disability Home Care hours (£0.2m). All other areas are largely as reported in Qtr 3.
- The budget challenge to Adult Social Care in 2017-18 has been to deliver £20.2m of savings, including £1.9m of unachieved savings from prior years. Of this £14.2m has been unmet as outlined in prior reports, and detailed in Appendix 1.
- Funding from the iBCF was announced in two stages, £1.5m in the allocations from central government in December and a further £10.4m announced in the Governments spring budget after the Council budget was set.
- £5m of this funding, agreed in the Winter Plan, has been used to increase homecare capacity; to increase fees paid to providers to stabilise the market, and to pay hospital retainers to providers to ensure people are transferred home quickly with support following discharge from hospital. Additional rapid response home support has also been commissioned from the market to support people in crisis to remain at home. Bradford continues to have one of the lowest Delayed Transfer of Care rates in the country reflecting good performance.
- As previously reported the department continues to reduce both residential and nursing placements in line with the Home First strategy, and place people in community settings where appropriate.

⁵ Operational Services + Intergration and Transition + Strategic Director.

- However, despite the positive direction of travel, overall there are more Older People and people with Physical Disabilities receiving care at the fourth quarter (+37) than in 2016-17.

	2014-15	2015-16	2016-17	* 2017-18
Average OP Residential Population	952	885	871	793
Average OP Nursing Population	383	346	333	327
Average PD Residential Population	87	88	72	68
Average PD Nursing Population	56	55	58	49
Total Residential and Nursing	1,478	1,374	1,334	1,237
Average OP in receipt of Homecare	1,425	1,426	1,541	1,664
Average OP in receipt of Direct Payments	96	104	130	152
Average PD People in receipt of Homecare	237	203	132	122
Average PD people in receipt of Direct Payments	133	133	137	136
Total Community Care	1,891	1,866	1,940	2,074
Total	3,369	3,240	3,274	3,311

*Forecast average population

- In order to help address the overspend, a number of previously approved savings have been deleted, or deferred to future years to reflect longer implementation periods. The table below shows the incremental impact of savings and investment decisions agreed as part of the 2018-19 budget.

Ref	Description	2018-19 £'000	2019-20 £'000
3A2	Total Adults Savings	-8,000	-8,000
	Amended Savings from prior years		
3A2	Changes to Home Care Services	1,500	
3A6	Changes to Learning Disability day care and procurement	1,000	-1,000
3A10	Changes to contracts for Learning Disability residential and nursing	1,000	-1,000
4A1	Adults Demand management – deferred to 2020-21	8,000	
	Total amended savings from prior years	11,500	-2,000
	Demographic Growth	2,993	3,052
	Ring Fenced expenditure in Adult Social Care	1,436	-1,436
	Total Budget Change (excluding inflation)	7,929	-8,384

- = Budget reduction + = Budget increase

- The cumulative impact of the above incremental changes is that Adult Social Care will have £7.5m^[1] more budget over the next 2 years; £22.4m more than was planned when the 2017-18 budget was set.

Public Health

- Public Health is forecast to underspend the £1.4m net expenditure budget (£45.4m gross budget) by £0.2m and deliver the £3.4m savings as planned.
- The forecasted saving of £0.2m is within the Environmental Health service and is attributable to renegotiated contracts and reduced activity.

^[1] £7.929m (Yr 1) + (£7,929m - £8,384m) (Yr 2) = £7,474m

- A full report detailing Finance and Service Performance will be provided in the Outturn report in June.
- Public Health will have the following savings to deliver in 2018-19 and 2019-20.

Ref	Description	2018-19 £'000	2019-20 £'000
4PH1	School Nursing and Health Visiting	-1,390	-1,959
4PH2	Substance Misuse Service	-1,634	-625
4PH3	Sexual Health	-25	
4PH4	Tobacco / Smoking Cessation services	-59	-2
4PH5	Homestart, Work safe, Injury Minimisation programme	-93	
4PH6	Physical Activity, Food and Nutrition	-250	
4PH8	Warm Homes for Healthy People	-40	-20
4PH9	CCG Rebasing	-499	
4PH10	Public Health staffing	-350	-310
4PH11	Environmental Health	-40	
5PH1	A Home From Hospital Service – service redesign	0	-170
	Total	-4,380	-3,086

4.2 Children's Services

- Children Services are forecast to overspend the £96.1m net expenditure budget (£484.8m Gross budget) by £3.7m, a £0.2m improvement from Qtr. 3.

Children's Services	Gross expenditure			Income			Net expenditure		
	Budget	Forecast	Variance	Budget	Forecast	Variance	Budget	Forecast	Variance
	£m	£m	£m	£m	£m	£m	£m	£m	£m
Directors Office	0.4	0.4	0.0	-	-	-	0.4	0.4	0.0
Learning Services	298.9	298.9	0.1	-303.5	-303.6	-0.1	-4.6	-4.6	-0.0
Children's Specialist Services	59.5	65.2	5.7	-3.9	-4.3	-0.4	55.5	60.9	5.3
Performance, Commissioning	14.4	14.3	-0.1	-0.8	-0.8	-0.0	13.6	13.5	-0.1
Deputy Director	111.7	110.9	-0.8	-80.6	-81.3	-0.7	31.2	29.6	-1.5
Total	484.8	489.7	4.9	-388.7	-390.0	-1.2	96.1	99.7	3.7

- The main overspends are within Children's Social Care Services linked to higher numbers of Looked After Children and Children requiring support as previously reported.
- The Looked After Children purchased placement budget is forecast to overspend by £1.6m, and the Fees and Allowances and In House residential units are both forecast to overspend by £0.4m each. Additionally, there are £3.1m of unachieved savings.
- The overspends outlined above are partly offset by underspends on the Education, Employment and Skills service of £1.5m (Early Years £0.6m, Achievement / Interventions £0.4m, SEND services £0.2m)
- Since the last report the forecast overspend is now £0.2m lower. The main changes are analysed as follows:
 - Children external purchased placement position has improved by £0.2m. The service has reduced the spend on expensive external residential placements and used Independent Fostering Agencies for placements.
 - Staffing vacancies across the service (£0.2m).
 - The above are partly offset by a £0.3m overspend on the Family First Programme due to fewer families being engaged than planned.
- The 2018-19 budget approved on 22nd February 2018 has sought to address some of the overspending areas. £3.569m of budget relating to undeliverable savings has been added back as outlined below.

Ref	Description	2018-19 £'000
3C7	Reducing the cost of high cost placements – Children's Social Care	1,289
3C8	Reducing the number of looked after children by 75	815
4C4	Child Protection Management restructure	300
4C9	Disabled Children – reduce staffing on CAMHS and reduce budget by 1%	34
4C10	Review Team – review budget and reduce by 2% in 2018/19	24
4C14	Reducing agency spend in Children's Social Care	1,025
4C15	Review of front door customer contact	46
	Total	3,569

- = Budget reduction + = Budget increase

- The table below shows the incremental impact of savings and investments agreed as part of the 2018-19 budget.

Ref	Description	2018-19 £'000	2019-20 £'000
Savings			
5C1	Review respite provision after introduction of Personalised budgets		-400
4C2	Prevention and Early Help (further savings of £2.6m in 2020-21)		-3,000
4C4	Child Protection Management restructure	-240	
3C7	Looked After Children	-250	
4C5	Children's Social Care Management restructure	-85	
4C6	Early Help - review structures	-120	-660
4C7	Looked After Team	-19	-19
4C8	Fostering & Adoption	-50	
4C9	Disabled Children's Team	-34	
4C10	Child Protection review team	-24	
4C11	Leaving Care	-34	
4C13	Drugs and Alcohol Team	-50	
4C14	Child Protection – agency spend	-36	
4C15	Child Protection – customer contact	-46	
4C3	Children's Services	-150	-50
New Children's Savings per 2018/19 budget		-1,138	-4,129
Amended savings from prior years		3,569	
Demographic Pressures		625	625
CRP5.1	Ongoing Child Sexual Exploitation prevention	300	
CRP5.2	Ongoing Children's Social Work investment	450	
CNR5.1	Two year post to work on Quality Assurance	67	
CNR5.2	Two year support for Early Help	500	
Total (excluding inflation)		4,373	-3,504
- = Budget reduction + = Budget increase			

- The cumulative impact of the above is that Children's Services will have £5.2m⁶ more budget over the next 2 years.

⁶ £4,373m (Yr 1) + (£4,373m - £3,504m) (Yr 2) = £5,242m

4.3 Department of Place

- The Department of Place is forecast to overspend the £84.2m net expenditure budget (£141m gross budget) by £1.9m.

Department of Place	Gross expenditure			Income			Net expenditure		
	Budget	Forecast	Variance	Budget	Forecast	Variance	Budget	Forecast	Variance
	£m	£m	£m	£m	£m	£m	£m	£m	£m
Directors Office	0.6	0.6	-	-	-	-	0.6	0.6	-
Fleet & Transport Services	12.7	12.3	-0.4	-13.5	-13.2	0.3	-0.8	-0.9	-0.1
Waste Collection & Disposal	30.1	31.6	1.6	-6.1	-6.0	0.1	23.9	25.6	1.7
Economy & Development	11.6	11.3	-0.3	-3.7	-3.7	-	7.9	7.6	-0.3
Sports & Culture Services	35.4	36.4	1.0	-20.9	-21.0	-0.1	14.6	15.4	0.8
Neighbourhoods & Street Scene	19.2	18.4	-0.8	-6.0	-6.2	-0.3	13.2	12.2	-1.1
Planning, Transportation & Highways	31.5	31.7	0.3	-6.7	-6.1	0.6	24.8	25.7	0.9
Total	141.0	142.3	1.4	-56.8	-56.2	0.6	84.2	86.1	1.9

- The £1.9m forecast overspend position is due to pressures within Waste Services disposal costs (£1.7m), Planning, Transportation & Highways (£0.9m) and continuing pressure within Sports Facilities (£0.8m), offset by forecast underspends in Neighbourhoods and Streetscene (-£1.1m) linked to lower expenditure, and higher revenues from parking and fines. Some smaller underspends in Culture (-£0.3m), Economy and Development Services (-£0.3m) help offset the overall Departmental overspend.
- Compared to Qtr.3, the forecast overspend has increased by £0.3m due mainly to a £0.6m increase in the Waste Services overspend to £1.7m, partly offset by a reduction in the level of forecasted spend in Events (£0.2m) and Fleet services (£0.1m).
- Of the £6.1m planned savings, £1.4m is forecast not to be achieved, although £0.3m in offsetting mitigating savings have been found, reducing the balance to £1.1m.

4.3.1 Waste, Fleet & Transport

- Waste Services are forecast to over spend the £23.9m net expenditure budget (£30m gross budget) by £1.7m due to overspends in Waste Disposal. This is a £0.6m increase from Qtr. 3. due to an increase in costs related to residual waste totalling £0.4m, a reduction in forecasted income of £0.1m and increased staffing costs of £0.1m
- The Alternate Weekly Collection project was implemented in two stages, Keighley went live in May 2017 and Bradford in July 2017. As expected, levels of kerbside residual waste significantly reduced from 127,000 tonnes in 2016-17 to a projected 106,000 tonnes in 2017-18, and tonnes collected from Recycling bins increased from 20,600 tonnes in 2016-17 to a projected tonnage of 30,000 in 2017-18.
- After Qtr. 2 a second shift was implemented at the MRF to boost capacity and enable more materials to be recycled.
- Contamination has been a major issue and to deal with this prior to the recyclates entering the MRF, a decision was taken in December to introduce a Trommel (materials sorting machine) at the front end of the process. The Trommel will be trialled for six months from June 2018.

- Income from recyclates is seeing a decline due in part to changes in the recyclate market and it is anticipated that recent announcements from China will have an adverse impact on the UK market.
- As a result of the 2018-19 budget approved by Council on the 22nd February 2018, Waste Service budgets will have the following adjustments over the next 2 years.

Ref	Description	2018-19 £'000	2019-20 £'000
4E2	Alternate Weekly Collection saving	-807	84
4E3	Trade Waste Saving		-43
	Total Savings	-807	41
ERP5.1	Price increase and transport haulage costs resulting from new 12 year Waste Contract	1,717	521
ERP5.2	Prudential borrowing cost of Waste Vehicles	288	0
PNR5.2	One off cost of Foreign Exchange linked to new Waste Contract	133	-133
	Total Budget Increases	2,138	388
	Net Change	1,331	429

- = Budget reduction + = Budget increase

- The cumulative impact of the budget changes is that Waste Services will have an additional £3.1m budget over the next 2 years. It should however be noted that that the impact of the price increases and haulage costs resulting from the new waste contract alone is expected to cost £4.0m over the next 2 years.
- Fleet & Transport Services are forecast to overachieve the £0.8m net income budget (£12.7m gross expenditure budget) by £0.1m. Reduced income of £0.1m within Licensing and Land charges has been mitigated by savings within Passenger Transport and Fleet Services.

4.3.2 Neighbourhoods and Customer Services

- Neighbourhoods and Customer Services are forecast to under spend the £13.2m net expenditure budget (£19.2m gross budget) by £1.1m as a result of underspends in Uniformed Services (£0.6m) linked to lower expenditure, and higher revenues from car parking and fines than budgeted, and underspends totalling £0.5m in Neighbourhood Services, Customer Services, Youth Services and Street Cleansing.
- Budget savings of £1.4m are forecast to be delivered as planned.
- Within Uniformed Services, revenues from car parking tickets, parking fines and bus lanes fines are forecast to over achieve the budget by £0.3m. However, it is expected that bus lane fines and fixed penalty notices will be lower than prior years, indicating that the cameras and fines regime is changing behaviour as intended.
- As a result of the 2018-19 budget approved by Council on the 22nd February 2018, Neighbourhoods and Customer Services budgets will have the following adjustments over the next 2 years.

Ref	Description	2018-19 £'000	2019-20 £'000
4E4	Customer Services – further shift away from Face to Face to Self Service and Telephony	-50	-50
4E5	Street Cleansing and Public Conveniences	-336	-1,005
4E6	Pest Control – cessation of service	-36	0
4E13	Car Parking Income	-108	0
5E2	Youth Service – Grants to VCS providing youth work to cease	0	-311
Total Savings		-530	-1,365

- The cumulative impact of the above is that Neighbourhoods and Customer services will have £2.4m less budget over the next 2 years.

4.3.3 Sports and Culture

- Sports & Culture are forecast to overspend the £14.6m net expenditure budget (£35.4m gross budget) by £0.8m. The forecast is unchanged since the last quarter.
- Planned savings of £0.9m are forecast to be underachieved by £0.3m in year (Sports and Culture staffing - £0.1m, Museums staffing - £0.1m and the Review of Tourism - £0.1m). The full year effect of the saving will be delivered in 2018-19.
- Based on the 2018-19 budget, Sports and Culture services will have the following budget adjustments over the next 2 years.

Ref	Description	2018-19 £'000	2019-20 £'000
5E1	Museums and Galleries - review of service		-260
4E11	Sports and Physical Activity	-150	-50
4E7	Remodel Visitor Information service	-50	-50
4E8	Events and Festivals	-150	-150
4E9	Libraries	-100	-950
4E10	Theatres and Community Halls	-130	-130
4E12	Ministry of Food	-96	
4E1	Parks and Bereavement	-160	-60
Total Savings		-836	-1,650
PNR5.2	Temporary funding for 1 year only linked to Markets relocation		636
Total		-836	-1,014

- = Budget reduction + = Budget increase

- The cumulative impact of the above is that Sport and Culture Services will have £2.7m less budget over the next 2 years.

4.3.4 Economy and Development Services

- Economy & Development Services (E&DS) are forecast to underspend the £7.9m net expenditure budget (£11.6m gross budget) by £0.3m, a £0.1m increase from Qtr. 3. E&DS have multi-year funded programmes particularly those in Economic Development and Housing. A total of £2.0m of programme funding is proposed to be deferred to 2018-19.

- Budgeted savings of £0.3m are forecast to be delivered during the year as planned.
- It is proposed that expenditure on several Economic Development programmes be moved to reserves in 2018-19 specifically;

Reserves movements

£0.4m	in respect of Executive recommendation for European Structural Investment Fund match funding
£0.2m	relating to Executive's recommendation to commit funding for Enterprise Support
£0.125m	for developing local business improvement district
£0.007m	City Centre Management
£0.732m	TOTAL

- In addition, subject to overall corporate balances the service proposes the cost of delivering the Council Economic Strategy and additional support into community enterprise in 2018-19 be funded from one off unspent balances, specifically these are;

£0.1m	Ad:venture & Community Enterprise
£0.2m	Economic Strategy delivery
£0.3m	TOTAL

- Housing Operations, Development and Strategy is on track to balance the £3.1m net budget. Surplus rental income of £0.16m will be transferred into reserves at year end.
- Legislation requires that any funding generated from HMO licensing is retained to deliver the service. It is therefore proposed to create a reserve to retain funding for the statutory licensing scheme (£0.35m) for high risk houses in multiple occupation. A further proposal is made for utilisation over a multiyear period of the Flexible Homeless Support Grant with £0.2m being recommended to be set aside. Finally, £0.2m of New Burdens' funding in relation to the Homeless Reduction Act 2017 is recommended to be reserved. This brings to a total of £0.7m being proposed to be placed in reserve, as detailed below: -

£0.2m	Flexible homelessness support grant
£0.2m	New burdens funding for Housing Services
£0.35m	HMO licence fee multiyear delivery
£0.85m	TOTAL

- Based on the 2018-19 budget, Economy and Development services will have the following budget adjustments over the next 2 years.

Ref	Description	2018-19 £'000	2019-20 £'000
4R10	Education Capital Team	-50	0
4R13	Economic Development Service	0	-26
4R19	Housing Operations – income from agency fees	-44	0
	Total Savings	-94	-26
RRP5.1	Funding for Growth Initiative	500	0
	Net Total	406	-26

- = Budget reduction + = Budget increase

- The cumulative impact of the above is that Economy and Development Services will have £0.8m more budget over the next 2 years.

4.3.5 Planning, Transportation and Highways

- The service is forecast to overspend the £24.8m net expenditure budget (£31.5m gross budget) by £0.9m due to Street Lighting energy costs and the continuing underachievement of Building Control Fees as reported previously.
- Progress with the Local Plan is being made, the core strategy was adopted in July 2017, supplementary elements remain a work in progress. As a result, up to £0.3m of the full budget allocation (£0.5m) this year will not be fully utilised and will be requested for carry forward to 2018-19.
- As a result of the 2018-19 budget, Planning Transport and Highways will have the following incremental budget adjustments over the next 2 years.

Ref	Description	2018-19 £'000	2019-20 £'000
5R1	Reducing De trunked road maintenance budget	-224	
5R2	Increased charges for activities on the highway	-25	
5R3	Increased % of staff costs charged to capital projects	-250	
4R3	Commercialise Highway Delivery Unit	-233	
4R4	Centralisation of Urban Traffic Control	-246	
4R5	Planning Transport and Highways – increase charges	-44	
4R6	Planning Transport and Highways – reduce discretionary spend	6	
4R7	Planning Transport and Highways – reduce operational budgets	-2	
4R8	Robust admin of Yorkshire Common Permit Scheme	-70	
4R9	Reduce Area Committee support	-124	
4R11	Introduce limited hours street lighting	-60	-60
4R20	No longer accept new schools onto Active Travel	-28	-28
4R21	Reduce funding for Road Safety Team	-62	-62
	Total Savings	-1,354	-150
4R6	Centralisation of Urban Traffic Control (Prior year saving added back)	246	
	Total	-1,108	-150

- = Budget reduction + = Budget increase

- The cumulative impact of the above is that Planning Transport and Highways will have £2.4m less budget over the next 2 years.

Budget 2018-19

- As a result of the 2018-19 budget, the Department of Place will have the following budget adjustments over the next 2 years.

Description	2018-19 £'000	2019-20 £'000
Savings	-3,621	-3,151
Recurring Pressures & Investment Proposals	2,755	521
Non Recurring Investment Proposals	133	503
Amended Savings From Prior Years	246	0
Total	-487	-2,127

- = Budget reduction + = Budget increase

- The cumulative impact of the above is that the Department of Place will have £3.1m less budget overall over the next 2 years

4.3 Corporate Resources

- The department is forecast to underspend the £47.2m net expenditure budget by £2.9m; a £0.6m increase from Qtr. 3. The department remains on track to deliver £5.5m of savings as planned in 2017-18, and has made progress towards delivering further planned savings of £3.5m⁷ in 2018-19.

	Gross expenditure			Income			Net expenditure		
	Budget	Forecast	Variance	Budget	Forecast	Variance	Budget	Forecast	Variance
	£m	£m	£m	£m	£m	£m	£m	£m	£m
Corporate Resources									
Director of Corporate Resources	0.3	0.3	-0.0	-0.0	-	0.0	0.3	0.3	-0.0
Finance & Procurement	4.5	4.1	-0.5	-0.4	-0.5	-0.1	4.1	3.5	-0.6
Revenues & Benefits	182.3	181.9	-0.4	-178.5	-178.9	-0.4	3.8	3.0	-0.8
Information & Customer Services	14.0	13.5	-0.5	-1.0	-1.0	0.1	13.0	12.5	-0.5
Estates and Property Services	55.0	52.0	-3.1	-39.4	-37.2	2.2	15.6	14.7	-0.9
Human Resources	6.2	6.2	-0.0	-2.0	-2.0	0.0	4.2	4.2	0.0
Legal Services	8.3	8.2	-0.1	-2.1	-2.1	-0.0	6.2	6.1	-0.1
Total	270.7	266.0	-4.6	-223.5	-221.7	1.8	47.2	44.3	-2.9

- Strategic Director of Corporate Resources and Finance & Procurement are forecasting an under spend of £0.6m. Half is on savings on contract spend in Procurement with the remainder being primarily on salaries as posts remain vacant pending service reviews and future budget reductions.
- Revenues & Benefits are forecast to underspend by £0.8m; a £0.2m increase from Qtr. 3. Pressures on traded areas such as Payroll Services, and on fines and summonses income totalling £0.3m, is being offset by comparative reductions in contract costs. Additionally, cash handling & security services have restructured delivering significant in year savings of £0.1m (which will contribute to the £0.16m saving target already agree for 2018-19) while additional income from one off grants amounts to £0.2m.
- Information Services are forecast to underspend by £0.5m primarily relating to contract costs as a result of efficiencies achieved, both to date and expected to be achieved in year. This also includes a pressure from reduced income from schools which is forecast to be £0.1m below budget. £1.3m of planned for savings in 2017-18 are expected to be achieved in full, and the service is on track to deliver a further £0.7m of savings in 2018-19.
- The cost of Information Services has reduced from £22.8m in 2014-15, the last full year of the Serco contract, to a forecast figure of £13.3m in 2017-18. Gross costs per user have also fallen considerably from £3,403 in 2014-15 to a forecast figure of £2,371 in 2017-18.
- Estates and Property Services are forecast to underspend the £15.6m net budget (now including depreciation) by £0.9m; an increase of £0.2m since Qtr. 3. £2.1m of planned for savings in 2017-18 are expected to be achieved in full.
- Within the Built Environment group, Industrial Services Group (ISG) is expected to improve its bottom line position by £0.2m, up £0.1m on the Qtr. 3 position. This results from higher than expected pre-orders while the planned for restructuring is expected to deliver the budgeted savings in year. Due to the volatility of the trading environment it is proposed to create a reserve to smooth out this impact funded from any additional operating surplus after allowing for savings requirements.

⁷ £3.828m savings, less £280k and £15k amended savings added back.

- Building Services has seen a £2m fall in income & expenditure levels due to a reduction in capital works, with the reduced bottom line contribution being offset by Technical services who are expected to be £0.3m under budget due to higher levels of fee income for schools works. Architectural Services is however forecast to be £0.2m below its targeted contribution due to a reduction in workload over recent years. The Energy Team is forecast to be £0.3m under budget based on projected consumption levels which have reduced significantly following the vacation of property and investment into energy efficiency. However, unit prices are forecast to rise more than general inflation in future years and it is proposed to create a reserve to smooth out this impact funded from available underspends.
- Catering & Office Services is seeing pressure on its traded services increase, notably in School Catering where 6 school contacts were lost in September. However, 2 new school contracts were obtained in November and as a result of further improvements in productivity levels and savings they are still anticipating a net underspend of £0.2m. Improvements in profit margins within School Cleaning and an under spend on Residential Catering linked to reducing numbers have served to offset both the trading pressure on Other Catering and a small overspend on Building Cleaning.
- Estates Operational & the Property Programme forecast remains at a £0.1m under spend, and expect to achieve both planned for savings and increased rental income linked to the acquisition of investment properties and a review of rents. In 2017-18 this has included the acquisition of the Hall Ings NCP car park, the ceasing of the lease and vacation of Kershaw House. Additionally, the vacation of Bank House is due for completion at the end of March 2018.
- Estates new income which is expected to boost the account by £0.4m is partially offset by additional costs required relating both to taking on such new leases; i.e. capital financing costs, and in undertaking other property related work associated with transitioning to a smaller estate; i.e. relocating staff from Kershaw & Bank House into Sir Henry Mitchell & Margaret McMillan Tower. It should be noted that activity relating to the facilitation of Community Asset Transfers is covered by Implementation fund budgets. However, a pressure remains both in respect of both limited managerial resources and from additional 3rd party legal costs, and accordingly it is proposed that a reserve is set aside to provide resources to cover this need.
- Human Resources is forecast to balance the £3.9m net expenditure budget, a slight reduction from a projected underspend of £0.15m at Qtr3 due primarily to the firming up of income levels from schools where an ongoing pressure exists. The service has undertaken a restructure with the aim of reducing salary costs and has achieved £0.9m of planned savings in 2017-18, A further £0.2m of originally planned for savings are expected to be achieved in 2018-19 with a further £0.25m required as part of the new budget proposals. HR projections assume work on Council priority programmes such as Organisational Change & the Learner Management System is being funded via previously established reserves, £0.2m in 2017-18, with £0.4m remaining for 2018-19 onwards.
- Legal Services are forecast to underspend the £6.1m net expenditure budget by £0.1m and achieve budgeted savings of £0.3m in 2017-18. The service has experienced significant demand pressures on its Legal teams which has been offset by increasing income from charging for external services and by under spends on members support and civic budgets. However, after savings of £0.2m in 2018-19 are accounted for, an ongoing pressure exists. It should be noted that as 2017-18 is a

fallow year the district elections budget of £0.2m has been transferred to the central reserve to be made available over the remaining years of the cycle.

- As a result of the 2018-19 budget approved by Council on the 22nd February 2018, Corporate Resources budgets will have the following adjustments over the next 2 years.

Ref	Description	2018-19 £'000	2019-20 £'000
	Savings		
5FM1	Residential Catering – reduce due to declining need	-80	
5FM2	School Catering and cleaning – increase income & reduce costs	-200	
4R12	School Catering and Clearing – income	-35	
5F1	Revs & Bens – savings linked to External contractor system	-200	
5F2	Revs & Bens – General efficiency savings	-100	
4F3	Revs & Bens – efficiencies linked to reduced cash handling	-160	
5F3	Procurement – Savings	-100	
4H1	Human Resources – Transactional Support	-204	
4H2	Terms and Conditions	-400	-300
5H1	Workforce Development Savings	-250	
5L1	Register Officer – increase income	-15	
5L2	Legal & Democratic – reduced Member support	-149	
4L1	Legal and Democratic – reduced committee support	-55	-90
4R1	Industrial Services Group – staffing reductions	-43	
4R15	Facilities Management – operating cost reductions	-100	-200
4R16	Facilities Management – reduction in maintenance budget as estate shrinks	-100	-780
4R17	Facilities Management – reduction in size of estate and energy savings	-147	
4R14	Asset Management – Reduce Buildings and Increase income	-360	-200
4F1	Financial Services – efficiencies	-130	
4F2	Insurance	-300	-300
4S1	Information Technology Services	-700	-690
	Total Budget Reductions	-3,828	-2,560
FRP5.1	Council Tax Reduction scheme – Hardship Fund	500	
FRP5.2	Council Tax Reduction scheme – Admin costs	100	
LRP5.1	Investment into School appeals service	57	
LNR5.1	Temporary funding for Mortuary Services	66	-66
4H2	Amended savings from prior years – Terms and Conditions	280	210
4LI	Amended savings from prior years – Legal and Democratic	15	15
	Total Budget Increase	1,018	159
	Net Budget Change	-2,810	-2,401

- = Budget reduction + = Budget increase

- The cumulative impact of the above is that Corporate Resources will have £8m less budget over the next 2 years.

4.5 Chief Executive

Chief Executive	Gross expenditure			Income			Net expenditure		
	Budget	Forecast	Variance	Budget	Forecast	Variance	Budget	Forecast	Variance
	£m	£m	£m	£m	£m	£m	£m	£m	£m
Chief Executive Core Office	-0.1	0.2	0.3	-0.0	-0.0	-	-0.1	0.2	0.3
Political Offices	0.2	0.2	-0.0	-	-	-	0.2	0.2	-0.0
Public Affairs	1.4	1.4	0.0	-0.1	-0.1	-	1.3	1.3	0.0
Policy Programme	2.3	2.1	-0.2	-	-0.0	-0.0	2.3	2.1	-0.2
Total	3.9	3.9	0.1	-0.1	-0.1	-0.0	3.8	3.8	0.0

- The Chief Executive's Office is forecast to balance the £3.8m net expenditure budget. The new structure implemented in the 3rd quarter is projected to deliver savings of £0.25m in 2017-18 while £0.2m of work is expected to be undertaken on transformation fund projects. Full year savings of £1m for 2018-19 are expected to be achieved. It should be noted that 2018-19 budget assumes projected activity being carried out on transformation/Implementation projects is funded from the reserve and that any non-core work is funded separately.
- Based on the 2018-19 budget, the Chief Executive's Office will have the following budget adjustments over the next 2 years.

Ref	Description	2018-19 £'000	2019-20 £'000
4X1	Staffing restructure	-479	0
5X1	Top Management Staff costs	0	-75
	Total Budget Adjustments	-479	-75

- = Budget Reduction

- The cumulative impact of the above is that the Chief Executive's office will have £1.0m less budget over the next 2 years.

4.6.1 Non Service Budgets

- Non service budgets of £5.9m are forecast to underspend by £0.3m as a result of lower than budgeted spend on West Yorkshire Joint Committees and External Audit
- As a result of the 2018-19 budget approved by Council on the 22nd February 2018, Non Service budgets will have the following adjustments over the next 2 years.

Ref	Description	2018-19 £'000	2019-20 £'000
4F4	West Yorkshire Joint Committees – limit contribution to £1.1m	-35	-35

- = Budget Reduction

- The cumulative impact of the above is that Non Service budgets will have £0.1m less budget over the next 2 years.

4.7 Central Budgets & Contingencies

- Budgets held centrally include the revenue costs associated with capital investment, payment to the West Yorkshire Combined Authority, redundancy costs and contingencies.
- Central budgets are forecast to underspend by £9.6m largely as a result of a £8.4m underspend on the Capital Financing budget due to lower than planned capital expenditure and low interest rates, and £2.5m lower than budgeted redundancy costs. Fewer people have been made redundant than previously expected as services have managed to reduce posts by other means. Additionally, the average redundancy payment was also lower than estimated.
- The £4.8m of savings associated with Travel Assistance that are forecast to be undelivered, and will be mitigated by £4.8m of centrally held contingencies. Contingencies will continue to mitigate the underachievement, until the delivery plan is finalised.
- As a result of the 2018-19 budget approved by Council on the 22nd February 2018, Central budgets and Contingencies will have the following adjustments.

Ref	Description	2018-19 £'000	2019-20 £'000
	Capital Financing and Central Budget Adjustments	-8,440	2,059
NRP5.1	Additional Investment in capital expenditure		1,000
4R2	Amended Savings from prior years – WYCA levy	968.1	250
	Total	-7,472	3,309

- The cumulative impact of the above is that the Centrally held budgets will have £11.6m less budget over the next 2 years.

5. BALANCE SHEET

5.1 Cash Reserves

- Net movements from reserves have led to a £26.9m reduction in total reserves from £153.0m at 1 April 2017 to £126.1m at 28th February 2018 (£100.9m Council and £25.2m schools). Unallocated reserves stand at £14.5m.

	Opening Balance 2015-16 £m	Opening Balance 2016-17 £m	Opening Balance 2017-18 £m	Net Movement	Reserve Balance at 28 th Feb 2018 £m
Council reserves	145.8	133.9	127.8	-26.9	100.9
Schools Delegated budget	38.4	33.8	25.2	-0.0	25.2
Total	184.2	167.8	153.0	-26.9	126.1

- The £26.9m net releases from reserves include the £26m of reserve movements outlined in the Qtr.3 Finance report, and the following further movements in Qtr.4.

Releases from

- £0.3m Waste Collection and Disposal Options
- £0.2m Workforce Development

Appendices 2&3 outline Council and school's reserves.

5.2 School Balances

- The table below shows the School Reserves (including Schools Contingencies) forecast position as at 31st of March 2018. The forecast is based on information submitted by schools at the end of Qtr.3.

	Balance 1 st April 2017		Balance 31 st March 2018		Movement	
	Nos	£000	Nos	£000	Nos	£000
Nursery	7	659	7	586	0	73
Primary	106	8,580	100	6,032	6	2,548
Secondary	7	(635)	7	(2,811)	0	2,176
Special	6	354	4	391	2	(37)
Pupil Referral Units (PRU)	7	666	7	326	0	340
Subtotal	133	9,624	125	4,524	8	5,100
School Contingency		14,650		8,000	0	6,650
Other Activities		943		943	0	0
Total	133	25,217	125	13,467	8	11,750

- The school balances reserve is currently forecast to reduce by £11.75m in 2017-18.
- £5.1m of this relates to a forecast reduction in the aggregated school balances held by individual schools. Of this, £4.7m^[1] results from schools using reserves to balance budgets in 2017-18, and £0.4m is due to seven schools converting to academy status in 2017-18 (High Park Special School, Phoenix Special School, Priesthorpe Primary, East Morton Primary, St John CoE Primary, Holybrook Primary and Clayton CoE Primary). Two primary Schools (Aire View Infants and Hothfield Junior) have merged to form the new Silsden Primary School.
- Included within the £4.524m projected year-end balance are twelve schools (8 Primary (£0.27m), 3 Secondary (£3.48m) and 1 Special (£0.10m)) that currently hold a combined deficit school balance of £3.85m^[2].
- This is significantly higher than the £2.359m in 2016-17 and £1.5m in 2015-16, reflecting the impact of school funding reforms and schools having increased difficulty in balancing their budgets.

^[1] This is based on information supplied by schools as at the end of January 2018. Given that the overall schools dedicated schools grant allocated to Local Authority maintained schools is in excess of £234m per year, a small deviation between the forecast and the year end actuals can have a significant impact on school balances at year end.

^[2] 12 schools have deficits of £3.85m, with the remaining Local Authority maintained schools having combined forecast surplus balances of £8.374m leaving a forecast net balance of £4.524m overall.

- Of the remaining £6.65m forecast reduction in School balances, £5m is due to the completion of the transfer of schools to Academies that converted during 2016-17, with the remainder allocated in support of the 2017-18 schools budget.
- Within its recommendations, which were agreed by Council in February, the Schools Forum has allocated the £8m remaining schools contingencies forecasted to be held at 31st of March 2018 to support the overall Schools budget from April 2018.

6 CAPITAL

- The profiled budget position for 2017-18 for the Capital Investment Plan (CIP) stands at £90.4m and the projected outturn is £71.8m. To the end of February there has been spend of £61.8m. A summary position by service is shown in the Table below and the detailed Capital Monitor in Appendix 4.

	Budget Exec Feb 2018	Projected outturn 2017-18	Actual Spend to 28 Feb	2018- 19 Budget	2019- 20 Budget	2020-21 Onwards
	£'m	£'m	£'m	£'m	£'m	£'m
Adult & Community Services	4.3	3.3	2.8	10.4	10.7	0.9
Children's Services	14.1	13.9	11.5	16.5	28.8	6.5
Department of Place - Economy & Development	20.9	21.2	17.9	22.3	9.2	10.4
Department of Place - Planning, Transportation & Highways	19.4	13.8	12.0	28.5	37.0	62.8
Department of Place - Other	11.9	12.4	11.3	18.7	20.6	10.5
Corp Services – Estates & Property Services	8.0	7.2	6.3	3.6	0.9	0.1
Reserve Sch & Contingencies	11.8	0.0	0.0	39.6	34.5	38.0
All Services	90.4	71.8	61.8	139.6	141.7	129.2

- The main reasons for the reduction in the projected spend compared to Budget is due to:
 - Planning, Transportation and Highways include a number of grant funded schemes but due to a lack of contractor availability there have been delays in starting the work.
 - Property Programme works planned for this year will now complete in 2018-19.
 - Within Reserve schemes the CIP included £10m for Strategic Acquisitions but to date this year suitable investments have not yet been completed.
- Budgets have not been updated to reflect the projected spend position. At year end capital spend will be reviewed as part of the Outturn Report and underspends identified or where required budgets re-profiled. Monitoring and profiling of capital spend is being developed in line with the Capital Strategy.

New capital schemes

- A number of new schemes were approved in the budget report to Council and these will be included as part of the 2018-19 Quarter 1 Monitoring Report.

Capital Resources

- The Council has already achieved the target of £3m in capital receipts. An additional £22.4m in capital grants and contributions has been received so far this year. External borrowing has reduced due to £10m of debt maturing in February 2018 at an interest rate of 4.5 per cent.
- The Capital Financing Requirement is expected to be below forecast, due to projected spend being lower than budget, and the Council is within its Prudential Indicator limits for borrowing and capital expenditure.

7. COUNCIL TAX AND BUSINESS RATES COLLECTION

Council Tax

- In 2017-18 the Council will receive its budgeted Council Tax of £171.386m and its budgeted prior year surplus of £2m. Any in year variance against the budgeted Council Tax and surplus does not impact in 2017-18 but will be carried forward into 2018-19.
- A small in year pressure of £0.4m is forecast, which will be carried forward into 2018-19 Council Tax Base. This is because the cost of Council Tax Reduction is higher than expected due to the continuing identification of residents that qualify for full protection under the current scheme. Further, the provision for past years' debt is likely to increase, reflecting the on-going challenge of collecting small amounts of Council Tax from low income households. These pressures are partially offset by a higher number of overall households than forecast. Also the 2016-17 prior year surplus was £0.2m lower than budgeted which is also carried forward into 2018-19.

Business Rates

- The Council in 2017-18 will receive its budgeted £63.5m share of Business Rates and pay back its budgeted prior year deficit of £5.9m. As with Council Tax, any in year variance between budgeted Business Rates and the deficit is carried forward into the 2018-19 financial year. However, the deficit that outturned in 2016-17 was as expected.
- To date, current year Business Rate income is nearly in line with the amount forecast, with a small £0.7m deficit forecast, which is carried forward into 2018-19. This deficit is already incorporated into the 2018-19 budget. However, a challenge on forecasting Business Rates continues to be monitoring the impact on collection of backdated appeals. While a new appeal process started 1 April 2017, there is insufficient data to assess whether the current year's estimated provision is sufficient.

Collection Rates

- By 31 January 2018 the Council had collected £172.4m (83.86%) of the value of Council Tax bills for the year compared with £162.2m (83.48%) at the same stage last year.

Council Tax Collection	At 31 Jan 15/16	At 31 Jan 16/17	At 31 Jan 17/18
Council Tax - Dwellings administered	213,794	214,982	216,500
BV9 Council Tax collected in year	154,026	162,242	172,402
BV9 % of Council Tax Collected	83.23%	83.48%	83.86%
Council Tax Collection Target by Qtr. 3	83%	83.5%	83.75%

- The collection figure for Business Rates at 31 Jan 2018 is 86.88% (compared to 85.58% at the same time last year). A direct comparison cannot be made due to the changes as a result of the revaluation of all businesses and the application of the new revaluation relief.

Business Rates Collection	At 31 Jan 15/16	At 31 Jan 16/17	At 31 Jan 17/18
Number of Business Rates bills issued plus the number of summonses	28,420	30,713	35,468
CIS_034 (BV10) - Business Rates collected in year to £000s	125,079	129,252	124,183
BV10 % Business Rates collected in year	86.5%	85.58%	86.88%
Business Rates Collection Target by Qtr. 3.	89%	87%	87%

8.0 RISK MANAGEMENT

- The Financial risks of future known and uncertain liabilities are being addressed through contingencies and provisions outlined in this report.

9.0 LEGAL APPRAISAL

- This report is submitted to the Executive in accordance with the Budget and Policy Framework Procedure rules

10.0 NOT FOR PUBLICATION DOCUMENTS

None

11.0 RECOMMENDATIONS

That the Executive

- Note the contents of Document “ ” and the actions to be taken to manage the closure of the Council’s financial position for 2017-18.
- That in preparing the Final Accounts the Assistant Director – Finance & Procurement be authorised to take appropriate steps to secure the best advantage for the Council's financial position.

12.0 APPENDICES

Appendix 1	Savings Tracker
Appendix 2	Reserves Statement as at 28th February 2018
Appendix 3	Service Earmarked Reserves as at 28 th February 2018
Appendix 4	Capital Investment Plan

13.0 BACKGROUND DOCUMENTS

- The Council's Revenue Estimates for 2018-19 – Council Report P 22 February 2018
- Proposed Financial Plan updated 2018-19 to 2020-21 5th December 2017
- Qtr. 1 Finance Position Statement 2017-18 Executive Report 11th July 2017
- Annual Finance and Performance Outturn Report 2016-17 Executive Report 11th July 2017
- Medium Term Financial Strategy 2018-19 to 2020/21 and Beyond incorporating the Efficiency Plan - Executive Report 11th July 2017
- Annual Finance and Performance Outturn Report 2015-16 Executive Report 19 July 2016
- The Council's Revenue Estimates for 2016-17 & 2017-18 – Council Report R 25 February 2017
- The Council's Capital Investment Plan for 2016-17 to 2019/20 – Executive Report BB 23 February 2016
- Section 151 Officer's Assessment – Council document S 25 February 2016

Savings Tracker

Appendix 1

Ref	Saving Narrative	Budgeted Saving £000s	Forecast Saving £000s	Variance £000s
Health & Wellbeing				
3A1	Changes to the Contributions Policy	611	0	611
3A2	Changes to Older People and PD Home Care Service	1,500	0	1,500
3A3	Changes to Supported Living for Learning Disabilities	500	165	335
3A6	Changes LD Day Care and Procurement	1,000	0	1,000
3A7	Changes to Housing Related Support	1,000	710	290
3A8	Continue to Review Learning Disabilities Travel Support	360	235	125
3A10	Changes to Contracts for LD Residential and Nursing	1,000	0	1,000
3A12	Review Charging Arrangements for People with MH – 17/18	250	0	250
4A1	Adults - Overall Demand Management Strategy - moving from a dependency model to one that promotes independence and resilience (e.g. reducing numbers coming in to care, care system culture change, speeding up integration, redesign enablement, reviewing financial needs, continued personalisation).	8,000	0	8,000
4A2	Demand management – further reductions in high cost packages, further reductions in Supported Living contracts/packages, various reductions in travel and fees.	2,000	1,450	550
Total 2017-18 new budget savings				13,661
3A1	Changes to the Contributions Policy	466	377	89
3A10	Changes to Contracts for LD Residential and Nursing	278	0	278
3A12	Review Charging Arrangements for People with MH	215	70	145
Unachieved savings from prior years				512
Health and Wellbeing Total				14,173
Children's Services				
3C7	Looked After Children - bring children cared for outside of Bradford back into the District.	500	85	415
4C4	Child Protection management restructure - reduction in teams by four to ten with potential reduction in team managers plus review other overall budgets	240	60	180
4C7	Looked After Team – Review of staffing and non-staffing budgets	19	0	19
4C14	Reducing agency spend in Children's Social Care Services	1,025	0	1,025
4C16	Administrative Support restructure – rationalisation of the supervision and management structure	100	35	65
Total 2017-18 new budget savings				1,704
3C7	Looked After Children - bring children cared for outside of Bradford back into the District.	624	0	624
3C8	Looked After Children - Reduce the Numbers of Looked After Children by 75 Over 2 Years.	815	0	815
Unachieved savings from prior years				1,439
Children's Services Total				3,143

Department of Place				
3E1	Support & Encourage Recycling	200	130	70
3E2	Introduction of Charges for Green Waste	310	190	120
3E4	Alternative Week Waste Collection	1,000	575	425
3E9	Sports Facilities – new online booking system	50	25	25
3E11	Restructure Sports & Culture Management Staffing	100	0	100
3E13	Transfer Ownership of Playing Pitches & Facilities to Sports Clubs, Parish Councils & Community Organisations	80	60	20
3E14	Parking Charges at Some Parks and Woodlands	40	10	30
3E19	Museums – restructure of the Service	80	0	80
3E22	Review of Tourism Budget	50	0	50
4R3	Commercialise HDU to increase the range of services provided	223	293	(70)
4R4	Centralisation of urban traffic control	119	0	119
3R13	CCTV – commercial income generation	100	50	50
3R14	Street Lighting - Partial Night Switch Off	100	50	50
3R18	Re-Structure Planning Transport & Highways and Transfer Some Functions to the West Yorkshire Combined Authority	125	0	125
Total 2017-18 new budget savings				1,194
R19	Reform services following on from highways delivery review. Reduce lighting costs and energy consumption through reduced and/or varied street lighting levels across the district's modern lighting stock. Securing a reduced highways insurance premium due to application of new legislation. Reduce the operational budgets for Urban Traffic Control, Street lighting and Highway Maintenance which represent a 10% reduction in operational budgets with a resultant pressure on maintaining assets across those areas. This would adversely affect: the efficiency of first time permanent repair of potholes; overall network condition; potential increase in insurance claims; risk of traffic disruption due to signal failure; increase in repair times for street lighting	170	0	170
Unachieved savings from prior years				170
Department of Place Total				1,364
Travel Assistance		4,774	0	4,774
Total Forecast underachievement				23,454

Reserves Statement as at 28th February 2018

Appendix 2

	Opening Balance £000	Movement in 2017-18 £000	Closing Balance £000	Comments
A. Reserves available to support the annual revenue budget				
Unallocated Corporate Reserves	14,497	0	14,497	
Total available Unallocated Corporate Reserves	14,497	0	14,497	
B Corporate Earmarked Reserves to cover specific financial risk or fund specific programmes of work.				
ESIF - STEP	1,198	358	1,556	Funding to support young and disadvantaged people into employment
Managed severance	4,093	-4,093	0	Money to meet termination costs in the years beyond 2017-18. Used to support 2017-18 budget.
Exempt VAT	2,000	0	2,000	Amount set aside to meet the estimated cost of VAT that the Council would not be able to recover should it exceed its partial exemption limit.
Waste Collection and Disposal Options	3,063	-2,585	478	A Trade Waste VAT claim resulted in a £4.4m reimbursement. This has been set aside to address future Waste Collection and Disposal costs
Trade Waste VAT refund	343	-120	223	£120k per annum to be used in 2015-16 onwards to contribute towards the cost of Financial Services.
PFI credits reserve	805	0	805	Funding to cover outstanding potential Building Schools for the Future liabilities.
Insurance	1,775	0	1,775	To mitigate and smooth the impact of any future increases in insurance premiums.
Industrial Centres of Excellence	1	0	1	
Sports Strategy	104	0	104	To cover feasibility costs associated with the Sports Strategy.
Single Status	24	0	24	To cover any residual implementation of Single Status costs.
Transformation Programme	124	-124	0	To fund transformational activity
Better Use of Budgets	2,788	-2,787	1	To cover deferred spend on priority work from 2016-17.
Producer City Initiative	192	-34	158	To pump prime initiatives linked to the Council's Producer City programme
Regional Growth Fund	5,188	-520	4,668	The Council's revenue match funding for the Regional Growth Fund
Regional Revolving Investment Fund	3,956	-1,657	2,299	Money set aside in 2013-14 carried forward to meet the Council's commitment to the Regional Revolving Investment Fund.
Discretionary Social Fund	1,848	0	1,848	To fund a replacement local welfare scheme following the government ending its Local Welfare Assistance grant programme at 31 March 2015.

	Opening Balance £000	Movement in 2017-18 £000	Closing Balance £000	Comments
Transitional and Risk Reserve	6,863	-235	6,628	To help fund Transitional work, and cover risks.
Dilapidation & Demolition	2,000	-200	1,800	At the end of a lease on a building, the Council will be liable for any dilapidations of the building. The Council also plans some demolition work.
Health Integration Reserves	222	0	222	Available to fund projects that lead to greater integration between the Council and its Health partners.
Match Fund Basic needs Grant	700	0	700	
Strategic Site Assembly Implementation Reserve	756	0	756	
	0	2,500	2,500	To fund Projects associated with delivering 2017-18 savings plans.
Sub Total	38,043	-9,497	28,546	
C. Reserves to support capital investment				
Renewal and replacement	13,283	-7,979	5,304	Funding used to support the capital investment programme.
Markets	1,148	-239	909	Cumulative Market trading surplus's to be re-invested in maintaining market buildings throughout the district.
Sub total	14,431	-8,218	6,213	
D. Service Earmarked Reserves	41,685	-8,874	32,811	See Appendix 2
E. Revenue Grant Reserves	8,366	-373	7,993	
F General Reserves				
General Fund	10,803	0	10,803	The GF balance acts as a necessary contingency against unforeseen events. The balance at 31st March represents a minimum of 2.5% of the Council's budget requirement in line with council policy and the general advice of External Auditors.
Schools delegated budget	25,217	0	25,217	Represents in the main balances held by schools as part of delegated budget responsibility. These balances are not available for Council use but are balances attributable to individual schools.
Sub total General Fund Reserve & School balances	36,020	0	36,020	
Grand total	153,042	-26,962	126,080	

Departmental Earmarked Reserves Statement at 28th February 2018

	Opening Balance £000	Movement in 2017-18 £000	Latest Balance £000	Comments
Adult and Community Services				
Supporting People	1,416	0	1,416	Funding to support invest to save projects
Integrated Care	4,491	-3,200	1,291	NHS and Council monies used to support ring fenced projects and integration of health and social care
Great Places to Grow Old	436	-147	289	Funding to cover management and staffing costs linked to the transformation of services for older people.
Care Act Reserve	4,543	-3,000	1,543	To support the implementation of the Care Act
Public Health	59	0	59	
Total Adult and Community Services	10,945	-6,347	4,598	
Children Services				
BSF Unitary Charge	6,929	0	6,929	These reserves are being built up to ensure that in the future there is sufficient money available to meet the cost of BSF annual contract payments when the PFI grant the Council receives reduces
BSF Unitary Charge Phase 2	4,465	0	4,465	See above
Children's Service Program Support	52	0	52	
Better Start Programme	90	0	90	Council's two year contribution to a programme that will bring in £50m of revenue investment to the District over a 10 year period.
Recruitment & Retention	105	0	105	
Routes to Work	348	-348	0	Employment and Skills funding that was carried forward from 2014-15 to complete initiatives that span more than twelve months.
Advanced Skills Fund	10	-10	0	
Retail Academy (Skills for Employment)	227	0	227	
Child Sexual Exploitation Prevention	300	-300	0	To support the continuation of CSE work in 2017-18.
Training Work Programme (Skills for Work)	927	0	927	
Total Children	13,453	-658	12,795	

	Opening Balance £000	Movement in 2017-18 £000	Latest Balance £000	Comments
Department of Place				
Marley pitch replacement	305	0	305	To provide match funding under the terms of grants given to maintain Sports and Leisure venues across the District
Waste disposal procurement	83	0	83	Set aside to meet Departmental costs associated with delivering a Waste Management solution
City centre regeneration	51	0	51	
Customer Service Strategy	835	-750	85	Non recurring investment to be used to fund the Customer Service Strategy.
Taxi Licensing	491	-20	471	Statutory requirement to set aside any taxi licensing surplus when setting future fees.
Theatres Box Office	446	0	446	
Cricket Pitch Refurbishment	310	0	310	
Culture Service Transition	121	0	121	To cover costs associated with modernising the service and adopting a different service delivery model.
Art Fund	12	-12	0	To fund the purchase of works of Art.
HLF Building Maintenance	10	0	10	A condition of the HLF grant is that an asset management programme is in place to maintain Manningham Library to a specified standard.
Torex	10	0	10	To address e-Govt targets and improve service delivery.
Saltaire Tourist Information Centre	15	0	15	
Culture Company	173	-100	73	Help create a Culture Company
Gym Equipment	133	0	133	To fund replacement gym equipment in Sports Facilities
Museum Restoration	91	-15	76	
Tour De Britain	8	0	8	
Tour De Yorkshire	279	0	279	To help fund the Tour De Yorkshire
Lidget Moor YC	18	-9	9	To support Youth Services in Lidget Green Area
Empty Homes	125	-125	0	To support the on-going programme to bring empty homes back into use
Council Housing Reserve	455	0	455	To meet future costs associated with later stages of the affordable

	Opening Balance £000	Movement in 2017-18 £000	Latest Balance £000	Comments
				housing programme
Housing Development Programme	75	0	75	Fee income generated to be used to subsidise the delivery of projects in future years.
City Park Sinking Fund	784	0	784	Funding set aside to meet the future maintenance costs of City Park.
European Structural Investment Programme	867	0	867	Match funding for ESIP
Empty Rates Relief Scheme	500	0	500	Supporting Business Growth
Stock Condition	95	-95	0	Funding to procure Stock Condition Surveys.
Private Housing Rented Option	664	-464	200	To undertake a feasibility study for a Social lettings Agency.
Homelessness prevention	956	-673	283	To fund initiatives to prevent Homelessness.
District Tenants Federation	30	0	30	Funding committed to provide support to District Tenants Federation
Clergy House/Jermyn Court	0	42	42	Set aside for Clergy House/Jermyn Court
Cold Weather Calculator	0	11	11	Licence costs over several years
Complex Needs Project	0	280	280	Project to support hard to place vulnerable homeless people
Fresh Start	0	412	412	Housing project focussing on offenders
B&B Emergency Contingency	0	261	261	
Housing Options IT System	0	173	173	
Department of Place	7,942	-1,084	6,858	

Corporate Resources

Schools Traded HR Reserves	106	0	106	To mitigate the risk of changes in customer base.
Business Support Centre	72	-72	0	To support organisational development
Workforce Development	549	-200	349	Changing the organisation - vision & values, recruitment & selection, development of managers, performance management, leadership & succession planning.

	Opening Balance £000	Movement in 2017-18 £000	Latest Balance £000	Comments
Learner Management System	81	0	81	Software/system implementation etc. in support of workforce development.
District Elections	192	2	194	To smooth the cost of District Elections over a four year period.
Non Council Events programme	10	0	10	To support events put on by non-Council.
Community Support and Innovation Fund	352	0	352	To support community led service provision and investment in initiatives that engage with vulnerable people.
Subsidy Claim	711	0	711	Contingent support set aside to address the fluctuations in the subsidy claims.
ICT Programmes Budget	6,212	0	6,212	To fund future ICT projects
UC Admin Reserve	545	0	545	To help cover the cost of the implementation of universal credit administration.
Facility Management Service Improvement	515	-515	0	To support investment in service improvements and cover against uncertainty in the client base
Total Corporate Resources	9,345	-785	8,560	
Total Service Earmarked Reserves	41,685	-8,874	32,811	

Appendix 4

Capital Expenditure

Scheme No	Scheme Description	Budget Exec Report		Projected outturn 2017-18	Spend 28 Feb 18	Budget 2018-19	Budget 2019-20	Budget 2020-21	Budget 2021-22
		Feb 18	Variance						
		£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000
Health and Wellbeing									
CS0237	Great Places to Grow Old	0	0	0	0	0	9,138	0	0
CS0237	Keighley Rd Extra Care	2,050	-150	1,900	1,557	5,870	488	0	0
CS0237	Keighley Rd Residential Care	1,100	0	1,100	962	2,645	89	0	0
CS0373	BACES DFG	667	-567	100	51	443	443	443	443
CS0239	Community Capacity Grant	151	-75	76	76	1,452	516	0	0
CS0348	Whiteoaks Respite Centre	153	-90	63	63	0	0	0	0
CS0311	Autism Innovation Capital Grant	19	-19	0	0	0	0	0	0
CS0312	Integrated IT system	131	-90	41	41	0	0	0	0
CS0352	Electric vehicle charging infrastructure	30	-1	29	29	0	0	0	0
Total - Health and Wellbeing		4,301	-992	3,309	2,779	10,410	10,674	443	443
Children's' Services									
CS0249	Schools DRF	0	700	700	0				
CS0256	2yr old Nursery Educ Expansion	55	0	55	54	0	0	0	0
CS0278	Targeted Basic Needs	74	-34	40	40	0	0	0	0
CS0286	Outdoor Learning Centres	33	0	33	5	0	0	0	0
CS0022	Devolved Formula Capital	914	0	914	1,760	0	0	0	0
CS0030	Capital Improvement Work	173	-33	140	97	27	0	0	0
CS0240	Capital Maintenance Grant	5,569	-569	5,000	4,050	3,331	0	0	0
CS0244	Primary Schools Expansion Progr	4,094	0	4,094	3,147	1,409	6,919	0	0
CS0244	Silsden Sch £7.265m Exec 12/04/16	768	0	768	673	2,979	4,088	130	0
CS0244	SEN School Expansions	1,609	-209	1,400	1,133	2,391	0	0	0
CS0360	Early Yrs 30 hrs childcare	487	0	487	481	0	0	0	0
CS0314	Foster Homes Adaptation	16	0	16	4	0	0	0	0
CS0316	Tracks Educational provision	8	0	8	7	0	0	0	0
CS0322	Horton Park Prim Open Spaces	21	-6	15	15	0	0	0	0
CS0362	Secondary School Expansion	150	0	150	76	5,876	10,801	956	0
CS0377	LA SEN Free School	50	-49	1	1	500	7,000	5,350	100
CS0343	Children's Home Build Works	46	0	46	1	0	0	0	0
Total - Children's' Services		14,067	-200	13,867	11,544	16,513	28,808	6,436	100

Scheme No	Scheme Description	Budget Exec Report Feb 18	Variance	Projected outturn 2017-18	Spend 28 Feb 18	Budget 2018-19	Budget 2019-20	Budget 2020-21	Budget 2021-22
		£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000
Place - Economy & Development Services									
CS0134	Computerisation of Records	0	0	0	0	10	0	0	0
CS0136	Disabled Housing Facilities Grant	3,858	142	4,000	3,443	2,028	2,028	5,753	2,028
CS0137	Development of Equity Loans	800	0	800	626	1,000	1,300	1,200	1,195
CS0144	Empty Private Sector Homes Strat	600	0	600	385	662	0	0	0
CS0225	Afford Housing Prog 11-15	126	0	126	72	0	0	0	0
CS0308	Afford Housing Prog 15 -18	12,000	500	12,500	11,502	8,600	1,383	0	0
CS0250	Goitside	5	-1	4	4	0	0	177	0
CS0280	Temp Housing Clergy House	263	-233	30	30	0	0	0	0
CS0335	Bfd Cyrenians 255-257 Mngm Ln	163	-10	153	153	4	0	0	0
CS0084	City Park	0	0	0	0	205	0	0	0
CS0085	City Centre Growth Zone	0	0	0	-92	1,699	4,451	0	0
CS0189	Buck Lane	41	0	41	6	75	0	0	0
CS0228	Canal Road	0	0	0	0	100	0	0	0
CS0241	Re-use of Fmr College Builds Kghly	152	0	152	135	506	60	0	0
CS0266	Superconnected Cities	0	0	0	0	907	0	0	0
CS0291	Tyrils	0	0	0	18	4,800	0	0	0
CS0265	LCR Revolving Econ Invest Fund	2,299	0	2,299	1,148	0	0	0	0
CS0285	Strategic Development Fund	0	0	0	0	1,167	0	0	0
CS0345	Develop Land at Crag Rd, Shply	503	0	503	459	573	0	0	0
CS0378	Cust Serv Strategy	33	0	33	16	299	0	0	0
Total - Place - Economy & Development Serv		20,843	398	21,241	17,905	22,336	9,222	7,130	3,223
Place - Planning, Transport & Highways									
CS0131	Kghly Town Cntr Heritage Initi	397	-147	250	241	0	0	0	0
CS0178	Ilkley Moor	18	-18	0	0	0	0	0	0
CS0179	Landscape Environ Imp	23	-23	0	0	0	0	0	0
CS0281	Saltaire - Public Realm imp	0	2	2	2	0	0	0	0
CS1000	Countances Way - Bridge grant	0	0	0	0	0	30	0	0
CS0071	Highways S106 Projects	72	-32	40	36	100	356	0	0
CS0072	Countryside S106 Projects	0	10	10	0				
CS0091	Capital Highway Maint	4,968	0	4,968	4,712	0	0	0	0
CS0095	Bridges	806	0	806	767	0	0	0	0
CS0096	Street Lighting	203	0	203	166	0	0	0	0
CS0099	Integrated Transport	431	-431	0	912	0	0	0	0
CS0103	WY Casualty Reduction Ptner	36	13	49	49	0	0	0	0
CS0164	Local Intgrtd Transp Area Com	660	0	660	660	0	0	0	0
CS0168	Connecting the City (Westfield)	57	0	57	40	0	0	0	0
CS0172	Saltaire R/bout Cong& Safety Works	320	-290	30	38	0	0	0	0
CS0252	Measures to Support Hubs	45	-45	0	0	0	0	0	0
CS0264	Highway to Health	234	86	320	343	0	0	0	0
CS0282	Highways Strategic Acquisi	206	-176	30	30	0	0	0	0
CS0289	Local Pinch Point Fund	502	-495	7	7	0	0	0	0

Scheme No	Scheme Description	Budget Exec Report		Projected outturn 2017-18	Spend Feb 18	Budget 2018-19	Budget 2019-20	Budget 2020-21	Budget 2021-22
		Feb 18	Changes						
		£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000
CS0293	West Yorks & York Transport Fund	1,844	-965	879	434	19,383	26,145	34,062	27,014
CS0296	Pothole Fund	428	0	428	353	0	0	0	0
CS0306	Strategic Transp Infrastr Priorit	0	0	0	0	1,260	2,600	0	0
CS0306	Connectivity Project	4	0	4	4	1,196	400	0	0
CS0302	Highways Prop Liab Redn Strat	110	-97	13	13	0	0	0	0
CS0307	Bus Hot Spots	0	1	1	1	0	0	0	0
CS0310	Clean Vehicle Technology Fund	3	-3	0	0	0	0	0	0
CS0317	VMS Signage	39	-39	0	0	0	0	0	0
CS0319	Challenge Fund	2,465	-1,241	1,224	437	0	0	0	0
CS0323	Flood Risk Mgmt	285	-213	72	78	0	0	0	0
CS0325	Street Lighting Invest to Save	198	0	198	128	0	0	0	0
CS0329	Damens County Park	48	-48	0	0	60	0	0	0
CS0332	Flood Funding	919	-319	600	500	0	0	0	0
CS0334	Air Quality Monitoring Equip	9	-9	0	0	0	0	0	0
CS0350	Street Lighting Invest to Save	825	-745	80	0	825	0	0	0
CS0353	Strategic land purch Hard Ings Kghly	434	-41	393	374	4,415	3,176	0	0
CS0355	Strat land purc Harrogate Rd/New Line Jct	492	49	542	486	154	3,557	1,733	0
CS0358	SE Bradford Link Road	83	-18	65	17	0	0	0	0
CS0365	National Productivity Invest Fund	835	0	835	685	0	0	0	0
CS0370	LTP IP3 One System Public Transport	779	-429	350	314	779	779	0	0
CS0371	LTP IP3 Places to Live and Work	629	-379	250	183	300	0	0	0
CS0375	Sign Shop	82	0	82	18	0	0	0	0
CS0306	Strategic Acq - Highways	550	-165	385	0	0	0	0	0
CS0306	Strategic Acq - Highways	0	0	0	0	550	0	0	0
Total - Place - Planning, Transport & Highways		20,039	-6,206	13,833	12,028	29,022	37,043	35,795	27,014
Dept of Place - Other									
CS0060	Replacement of Vehicles	3,000	800	3,800	3,783	3,000	3,000	3,000	3,000
CS0066	Ward Investment Fund	0	0	0	0	35	0	0	0
CS0151	Building Safer Commun	0	0	0	0	47	0	0	0
CS0063	Waste Infrastructure & Recycling	677	-1	676	676	204	0	0	0
CS0132	Community Hubs	0	0	0	0	25	0	0	0
CS0283	Above Ground Fuel Storage	110	-110	0	0	0	0	0	0
CS0328	Cliffe Castle Various	35	-35	0	0	0	0	0	0
CS0374	Cartwright Hall CCTV	45	11	56	94	0	0	0	0
CS0376	Recycling Bins	680	0	680	640	0	0	0	0
CS0340	St George's Hall	3,000	750	3,750	3,264	5,139	0	0	0
CS0121	Roberts Park	65	0	65	65	0	0	0	0
CS0129	Scholemoor Project	0	0	0	0	0	0	83	0
CS0162	Capital Projects - Recreation	200	154	354	214	0	0	0	0
CS0187	Comm Sports Field & Facili	53	0	53	25	0	0	0	0
CS0229	Cliffe Castle Restoration	2,458	-5	2,453	2,192	52	0	0	0

Scheme No	Scheme Description	Budget Exec Report		Projected outturn 2017-18	Spend Feb 18	Budget 2018-19	Budget 2019-20	Budget 2020-21	Budget 2020-21
		Feb 18	Changes						
		£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000
CS0347	Park Ave Cricket Ground	162	0	162	161	20	0	0	0
CS0367	King George V Playing Fields	4	5	9	15	1,096	0	0	0
CS0277	Wyke Manor Sports Dev - demolitn	260	-230	30	8	0	0	0	0
CS0245	Doe Park	43	-37	6	6	0	0	0	0
CS0349	Chellow Dene	43	2	45	45	8	0	0	0
CS0356	Sedburgh SFIP	1,000	-800	200	42	8,865	7,035	49	0
CS0354	Squire Lane Sports Facility	0	1	1	1	0	5,000	4,400	0
CS0359	Community Resilience Grant	32	-32	0	10	0	0	0	0
CS0107	Markets	52	-1	51	50	35	0	0	0
CS0342	Westgate Carpark	0	0	0	0	0	0	0	0
CS0363	Markets Red'mnt - City Cntr	0	0	0	0	219	5,606	0	0
CS0247	Replace Box Office Equip	5	-3	2	2	0	0	0	0
Total - Dept of Place - Other		11,924	469	12,393	11,293	18,745	20,641	7,532	3,000
Corp Serv - Estates & Property Services									
CS0094	Property Programme (bworks)	0	0	0	0	609	0	0	0
CS0262	Margaret McMillan Towers	22	0	22	22	0	0	0	0
CS0318	Property Programme 15/16	30	25	55	55	0	0	0	0
CS0333	Argos Chambers / Britannia Hse	1,171	-821	350	222	0	0	0	0
CS0344	Property Programme 16/17	544	-25	519	475	0	0	0	0
CS0366	Property Programme 17/18	1,000	-450	550	297	750	0	0	0
CS0368	Dishwasher	31	-31	0	0	0	0	0	0
CS0230	Beechgrove Allotments	0	0	0	0	274	0	0	0
CS0269	Burley In Whrfedle Culvert repair	97	0	97	4	0	0	0	0
CS0050	Carbon Management	506	164	670	647	1,000	820	0	0
CS0305	Healthy Heating Scheme	90	-30	60	23	77	0	0	0
CS2000	DDA	50	-50	0	0	50	50	50	62
CS0361	Strategic Acquisitions	4,500	-148	4,352	4,352	576	0	0	0
CS0381	Former Odeon	0	500	500	200				
Total - Corp Serv – Estates & Property Services		8,041	-866	7,175	6,297	3,635	870	50	62

Scheme No	Scheme Description	Budget Exec Report		Projected outturn 2017-18	Spend Feb 18	Budget 2018-19	Budget 2019-20	Budget 2020-21	Budget 2020-21
		Feb 18	Changes						
		£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000
Reserve Schemes & Contingencies									
	General Contingency	471	-471	0	0	2,000	2,000	2,000	2,000
CS0277	Wyke Manor Ph2 Sports Dev	0	0	0	0	493	0	0	0
	Essential Maintenance Prov	0	0	0	0	2,000	2,000	2,000	2,000
	Bfd City Ctre Townscape Herit	750	-750	0	0	2,000	0	0	0
	Strategic Acquisition	10,000	-10,000	0	0	10,000	10,000	10,000	10,000
	Keighley One Public Sector Est	0	0	0	0	10,000	5,000	3,000	0
	Depots	0	0	0	0	3,000	0	0	0
CS0050	District Heating Scheme	0	0	0	0	0	7,000	7,000	0
	Canal Road Land Assembly	0	0	0	0	450	0	0	0
	Bereavement Strategy	0	0	0	0	8,500	8,500	0	0
Total - Reserve Schemes & Contingencies		11,221	-11,221	0	0	38,443	34,500	24,000	14,000
TOTAL - All Services									
		90,436	-18,618	71,818	61,846	139,104	141,758	81,386	47,842



Report of the Strategic Director - Place to the meeting of Executive to be held on 3rd April 2018.

Subject:

BM

Highway Policy Documents

Summary statement:

This report details revised policies and procedures that are to be adopted by the Network Resilience and Management Team in relation to Highway Enforcement and Operational Matters from 1st April 2018

Steve Hartley
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Overview & Scrutiny Area:

Environment & Waste Management

1. SUMMARY

- 1.1 This report details revised policies and procedures that are to be adopted by the Network Resilience and Management Team of the Councils Planning Highways and Transportation service in relation to highway enforcement and operational matters from 1st April 2018

2. BACKGROUND

- 2.1 The responsibility for highway enforcement issues was fully transferred to the Network Resilience and Management (NRM) Team in April 2017, following the restructure of the Planning, Transportation and Highways Service.
- 2.2 As a result of this transfer a comprehensive review of enforcement and operational policies and procedures has been undertaken during the 2017-2018 financial year.
- 2.3 This review has been undertaken to ensure that staff resources are managed in line with current operating practices.
- 2.4 Revised policies are being developed in line with existing and new legislation and the Councils approved Scheme of Delegation.
- 2.5 Documents are being developed that outline the case for each policy, relevant legislation and clear transparent guidance for the operation of that policy within the legislative frame. Four policies are outlined in Appendix 1, with further documents to be added at a later date.
- 2.6 Each policy is written as a standalone document within, forming the overall operating procedures of the enforcement arm of the NRM team.
- 2.7 Approved documents are to be available to officers, members and the general public (via the Council's website) to increase understanding of the need for enforcement and the operational procedures.
- 2.8 Policy Documentation will be reviewed annually.

3. OTHER CONSIDERATIONS

- 3.1 Each area of policy is to be reported on annually so that trends in enforcement issues may be considered as a part of the annual budget setting process for the Councils highways teams.
- 3.2 Each policy includes an informal procedure to follow before formal enforcement action is undertaken.
- 3.3 Major enforcement actions – those involving significant legal processes, communications and/or reputational risks - will be briefed to the Portfolio Holder for Regeneration, Housing, Planning and Transport on a fortnightly basis.
- 3.4 Local Ward Councillors will be briefed on major enforcement actions within their wards.

3.5 Policies may be reviewed as legislation changes.

4. FINANCIAL & RESOURCE APPRAISAL

4.1 The cost of enforcement actions is initially borne by the Council with costs recovered from the relevant party if they have the means to pay and ordered by the Magistrates Court. Such costs will not wholly be recoverable

4.2 Fines levied from criminal prosecutions are collected by the Court and are paid to the treasury. The Council may only recover costs as part of any criminal prosecution if the defendant has the means to pay.

4.3 The Highways Act 1980 (the 1980 Act) is specific in stating that any recovered charge or fee is to be retained and used to pay for the administration of the enforcement, the cost of works and the betterment of the highway network, in that order.

5. RISK MANAGEMENT AND GOVERNANCE ISSUES

5.1 Effective communications are essential when dealing with enforcement actions as they represent a reputational risk to the Authority.

6. LEGAL APPRAISAL

6.1 Any enforcement action can only be undertaken in accordance with existing statutory provisions and where sufficient evidence exists to pursue either civil enforcement action i.e. the issue of statutory notices requiring a person to act in accordance with the notice OR a criminal prosecution for failing to comply with a notice or a particular statutory provision.

6.2 In any event the Councils legal service will be consulted to establish the sufficiency of evidence and in relation to a proposed criminal prosecution if it is in the public interest to prosecute.

6.3 It is worthy of note notwithstanding the Council has power to prosecute criminal offences under the Local Government Act 1972 it is not obliged to do so. An out of court disposal by way of a Fixed Penalty, Simple Caution, written warning are all possible legitimate alternative courses of action.

6.4 It is the case that in certain circumstances where enforcement action can be taken by the issue of notices to " a person " (which includes an incorporated or unincorporated body) an appeal lays to the Magistrates court which will require additional departmental and legal resource (see paragraph 4 above).

6.5 The policy documents at appendix A refer to amongst other Acts possible enforcement action under the Highways Act 1980, the Local Government (Miscellaneous Provisions) Act 1982, the New Roads and Street Works Act 1991, the Traffic Management Act 2004, and the Antisocial Behaviour, Crime and Policing Act 2014.

- 6.6 The majority of criminal offences in relation to highways enforcement matters carry a penalty of a fine and are triable only before the Magistrates Court. In any event all criminal offences must be proved beyond reasonable doubt.
- 6.7 Notwithstanding the offences will be viewed by the Court as less serious criminal offences nevertheless some are legally complex.
- 6.8 Careful marshalling and presentation of evidence will be required in accordance with the existing statutory provisions namely the Magistrates Court Act 1980, the Police and Criminal Evidence Act 1984, the Criminal Procedure and Investigation Act 1996 (disclosure duties), the Human Rights Act 1998 and the Criminal Justice Act 2003.
- 6.7 Criminal investigations and presentation in court is a complex area of law and enforcement officers are likely to require additional training.

7. OTHER IMPLICATIONS

7.1 EQUALITY & DIVERSITY

- 7.1.1 Equality impact assessments have been undertaken for enforcement policies and are included in Appendix B.

7.2 SUSTAINABILITY IMPLICATIONS

- 7.2.1 There are no sustainability implications arising from this matter.

7.3 GREENHOUSE GAS EMISSIONS IMPACTS

- 7.3.1 There are no greenhouse gas emission implications from this matter.

7.4 COMMUNITY SAFETY IMPLICATIONS

- 7.4.1 Effective enforcement of Highway policy has positive benefits for the safety of the local community.

7.5 HUMAN RIGHTS ACT 1998

- 7.5.1 With regard to the Events Policy, Bradford MDC has a duty to facilitate peaceful process and will cooperate with event organisers in conjunction with the Police.
- 7.5.2 The HRA1998 creates a series of absolute and conditional rights to all citizens. Given the absolute right to a fair trial, the investigation and presentation of criminal offences before the Criminal courts must be in accordance with existing statutory provisions as mentioned in Para.6 above.

7.6 TRADE UNION

- 7.6.1 There are no trade union issues arising from this matter.

7.7 WARD IMPLICATIONS

7.7.1 Ward members will be advised of significant enforcement issues in their areas

8. NOT FOR PUBLICATION DOCUMENTS

8.1 None

9. OPTIONS

9.1 Executive may wish to offer advice and guidance to officers with regard to policy documentation and implementation and request changes as deemed necessary

9.2 Executive may wish to defer individual policies to enable further briefings as necessary.

9.3 Executive may decide to adopt the proposed policies and details of their implementation and operation.

9.4 Alternatively, Executive may decide not to approve the policies and details of operation and recommend an alternative approach to Highway Enforcement.

10. RECOMMENDATIONS

10.1 That Executive approves the initial Highway Enforcement Policy Documents with effect from the proposed implementation date of 1st April 2018

10.2 That responsibility for the determination and adoption of additional future enforcement policies and the alteration/adaptation of previously approved policies is delegated to the Strategic Director of Place, in consultation with the Portfolio Holder for Regeneration, Planning and Transport and the City Solicitor.

11. APPENDICES

11.1 Appendix A - Highway Enforcement Operational Policies.

11.2 Appendix B – Equality Impact Assessment.

11.3 Appendix C – Typical Examples of Enforcement Issues.

12. BACKGROUND DOCUMENTS

12.1 Highway Policy Equalities Impact Assessments.

12.2 Town Police Clauses Act 1847

12.3 Local Government Act 1972

12.4 Health and Safety at Work Act 1974

- 12.5 Highways Act 1980
- 12.6 Local Government (Miscellaneous Provisions) Act 1982
- 12.7 The Town and Country Planning Act 1990
- 12.8 The New Roads and Street Works Act 1991
- 12.9. The Human Right Act 1998
- 12.10 The Antisocial Behaviour Act 2003
- 12.11 Traffic Management Act 2004
- 12.12 The Clean Neighbourhood and Environment Act 2005
- 12.13 Antisocial Behaviour, Crime and Policing Act 2014

Appendix A

City of Bradford Metropolitan District Council

Highway Enforcement Operational Policies



Contents

Page

Highway Enforcement Protocols/Customer Service Pledge	3
Community Protection Notices	6
Clothing Banks	9
Nuisance Vehicles on the Public Highway	13

Planning Transportation and Highways – Policy Document Highway Enforcement Protocols/Customer Service Pledge

Author Lindsey Greenwood
Revision Number 1
Date of Last Revision
Review Date

1 Background

A major part of the work that the Network Resilience team deals with is based on issues/complaints received by Councillors, members of the public and colleagues. Bearing this in mind it is imperative that we have a fair, consistent and transparent approach to such matters whilst ensuring we maintain a high level of professional conduct at all times.

2 Council Position

The Council has numerous policies, frameworks and codes of conduct in place for staff representing the Authority.

As such, the stated position of the Authority is that all employees should adhere to these incorporating the following standards of conduct and best practice.

Relevant Authority Policies, Procedures and Frameworks

Employee Code of Conduct

Councils Equal Rights and Diversity Statement

Data Protection Act

Information Security Policy

Lone Working Framework

Health and Safety at Work Policy - which is in line with the Health and Safety at Work Act 1974 and the Management of Health and Safety at Work Regulations 1999

Bradford Council Plan

4 Guidance for Officers

All members of the Network Resilience must apply the principals of the Councils Employee Code of Conduct whilst carrying out the duties of their role. Failure to do so may result in further action being taken.

All employees will adhere to the agreed policies and procedures of the Network Resilience team, ensuring a fair and consistent approach is followed.

The Network Resilience team will endeavour to deal with all issues and complaints as soon as is reasonably possible in line with the team policies and procedures.

All issues/complaints are considered serious and are a priority in terms of a resolve however; in certain situations priority will be given to cases which impose an immediate danger to members of the public or raise serious safety concerns.

Whilst investigating issues/complaints the Network Resilience team will obtain and collate evidence, keep an accurate log of all actions taken and record all interactions with Councillors, members of the public and colleagues which are relevant to the case (e.g. names/dates/time/details of telephone conversations, meetings, actions of members of the public when out on site, emails, copy letters, photographs etc.) as this may form evidence for future enforcement action.

Whilst investigating complaints the Network Resilience team will endeavour to take a proactive approach to other possible enforcement actions/issues within the same vicinity and deal with them accordingly so as to prevent future issues.

All information and data will be retained securely in line with the Authorities Information Security Policy.

In the event of a conflict of interest (e.g. an employee having a personal/vested interest in a case) the said employee will notify the Network Resilience Principal Engineer immediately so the situation can be risk assessed and if appropriate, reassigned to another member of the team.

Due to the nature of our business we fully expect to have unsatisfied parties when dealing with complaints/issues and not all outcomes will necessarily be in favour of the complainant however; any decision made will be impartial and based on the relevant legislation, laws, policies and procedures and supported by the evidence collated.

Feedback to the majority of complainants will be provided via updates on the Councils Insight system. On occasions, if deemed appropriate, a member of the team may speak to the customer directly in which case notes of the conversation should be recorded.

Information recorded or relayed to other parties will be sympathetic to the principles of the Data Protection Act.

The Network Resilience team will welcome and react positively to customer feedback in order to improve its services.

No prosecutions or legal proceedings should commence without the consent of the Network Resilience Principal Engineer who will scrutinise the facts and supporting evidence. If necessary further information/evidence may be required to strengthen the case. The final decision on how such cases are moved forward is that of the Principal Engineer in conjunction with the Councils Executive Member for Regeneration, Planning and Transport.

We will brief and update the Councils Executive Member for Regeneration, Planning and Transport as well as local Members on cases of interest as and when deemed necessary (either directly or via the Network Resilience Principal Engineer); especially when dealing with more contentious and/or politically sensitive cases.

All employees should adhere to the principles of the Councils Equal Rights and Diversity Statement; being sympathetic to and recognising the diversity of the people and communities we are committed to support (in line with the priorities, principles and behaviours of the Bradford Council Plan).

In the event of abusive, persistent or vexatious complainants the case should be referred to the Network Resilience Principal Engineer. The Network Resilience Principal Manager will try to resolve the matter however; in some instances the matter may be referred to the Councils Complaints Manager and Assistant Director. If appropriate the complainant will be informed that there is no information or further evidence that can be obtained to affect the Councils position on the matter therefore the complaint cannot be pursued further.

Employee health and safety is paramount therefore all employees should be conscious of and adhere to the principals of the lone working framework and health and safety policy.

All working times should be logged on your outlook calendars when not in the office (start, lunch, finish) and when in the office the signing in book must be used. This is in line with the Councils Flexible Working policy, Lone Working framework and Health and Safety Policy.

In the event of being approached directly by a complainant whilst on a site visit a record must be made. If it is felt an employee's safety is compromised the employee should walk away and contact the police if necessary. In some instances it is advised that site visits are only conducted if two members of the team are present.

Planning Transportation and Highways – Policy Document Community Protection Notices - Highway Enforcement

Author Darren Badrock
Revision Number 1
Date of Last Revision
Review Date

1 Background

This document sets out information relating to Community Protection Notices (CPN), and how they are applied to Highway Enforcement Issues.

2 Council Position

Persistent nuisances and anti social behaviour relating to Highways Issues can have significant effect on the local population in terms of both health and safety matters as well as overall quality of life.

Whilst the primary legislation for Highway Issues is the Highways Act (1980), enforcement can be supplemented by the use of Community Protection Notices which give further tools to officers to deal with more persistent issues should an initial informal/informative approach fail.

3 Legislation

- Highways Act (1980)
- Antisocial Behaviour, Crime and Policing Act 2014 (Part 4)

4 Guidance for Officers

Before a CPN is considered, the relevant procedures to resolve the issues defined in the Authority's highway policies should be completed.

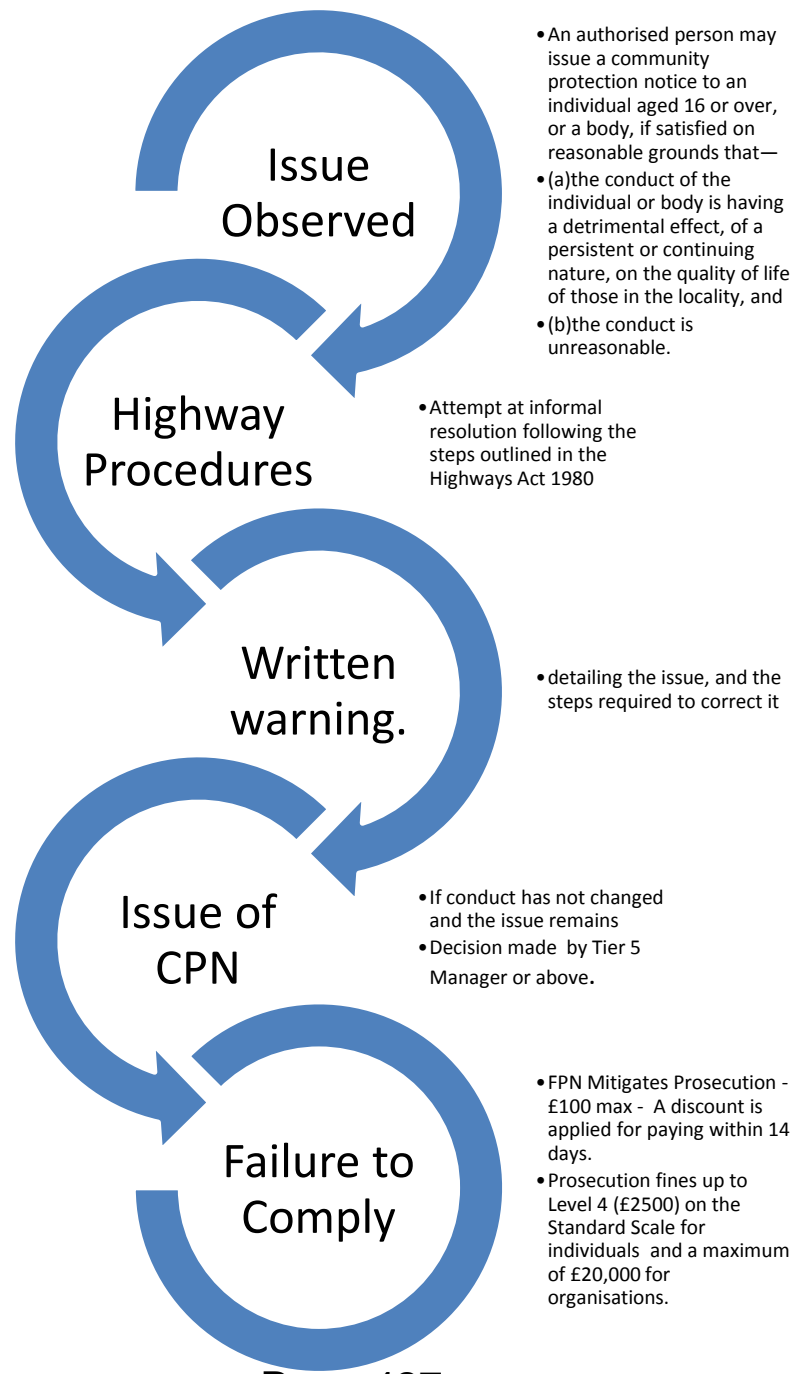
The case for a CPN must include the following

- Clear details of the observed issue, and evidence to support it, including complaints received.
- The issue of a clearly written warning letter to the individual, or organisation, defining the problem, the appropriate solution and a timescale for implementation
- An observation of the period of time given to resolve the issue, to confirm that the matter is continuing.

These must be presented to the Principal Engineer (NRM) - or appropriate substitute Tier 5 officer or above - who will make the final decision as to whether a CPN is issued or not, and record the reason why.

A simplified chart of the procedure is shown below;

Community Protection Notice Procedure (Simplified Procedure)



The decision to issue a fixed penalty notice, or prosecute will be made by the Principal Engineer (NRM) - or appropriate substitute Tier 5 officer or above.

Details of prosecutions will be discussed with the Portfolio Holder – Regeneration, Housing, Planning & Transport at the fortnightly enforcement briefing.

5 Financial Aspects/Costs to the Authority

Staff time and other associated costs relating to highway enforcement is to be recorded per case.

Fixed Penalty Notice fines recovered under the CPN process are to be retained by the Network Resilience Team and used for the cost of administering enforcement and the betterment of the Highway Network as necessary.

8 Notes

- i. This policy is to be reviewed annually following introduction.
- ii. The discounted level of FPN charges (for payment in less than 14 days) are set at the Authority's discretion, but cannot exceed £100
- iii. Mitigation of prosecution via FPN is the preferred method of resolution, however prosecution may be considered for serious persistent offences.
- iv. Prosecutions are criminal in nature and fines levied are not returned to the Authority, however costs may be recovered.

Planning Transportation and Highways – Policy Document

Clothing Banks

Author Darren Badrock
Revision Number 1
Date of Last Revision
Review Date

1 Background

The Highways Act 1980 mandates that items should not be placed on the public highway without obtaining a relevant licence from the Highway Authority.

2 Council Position

The licencing of items on the highway is a statutory power exercised by the Authority, delegated to Highway Enforcement Officer/Traffic Officer level and above.

Due to instances of anti-social behaviour, fly tipping and obstruction, Bradford MDC does not licence clothing banks or other similar charity collection facilities on the public highway.

3 Relevant Legislation

The following list details the main relevant legislative powers that may be used by the Authority in the context of enforcing this policy. This list is non inclusive and legislation is to be implied on a case by case basis.

Due consideration as to whether an item presents a nuisance or a danger should be clearly recorded when applying legislative procedure.

In all cases the procedures set out in the relevant sections of the respective act should be carefully followed.

Highways Act 1980	S.137	Penalty for wilful obstruction
	S.143	Power to remove structures from highways
	S.149	Removal of things so deposited on highways as to be a nuisance etc.

4 Guidance for Officers

Definition of Highway

“Highway” in this instance is defined as either;

- Footway, verge and carriageway maintained at public expense
- The surface layers of any area considered to be a public right of way (including un-adopted streets) but *not* any areas of private land or private road that do not form a right of way.

A public right of way is determined as any roadway or footpath that is not maintained at public expense, is not designated as Private and – under common law - is defined as follows;

“A highway is a way over which all members of the public have the right to pass and re-pass.

Their use of the way must be as of right, not on sufferance or by licence”.

A private road is considered to be one signed as such or one that is closed to public by means of barrier or gate (or possibly simply by the presence of a barrier or gate). The onus on proof of a highway being classed as private lies with the landowner making the claim

The definitive record of Highway Maintained at Public expense is held by The City of Bradford MDC Highway Records Officer - Anisah Naz — 01274 433707 – anisah.naz@bradford.gov.uk

We cannot act to remove clothing banks placed on private land, but if by their placement they cause a problem on the highway we will attempt to contact the owner and ask for them to be moved to prevent a problem occurring.

Any issue of fly tipping around clothing banks is a matter of environmental enforcement – highways holds no budget for cleansing operations.

Legislative interpretation

- S.137 makes it an offence to block free passage along a highway
- S.143 allows the Authority to give notices to remove structures from highways.
- S.149 allows the Highway Authority to remove items that are deemed to be a nuisance.

Clothing banks placed on the Highway are to be treated as either a nuisance or danger depending on officer assessment. Assessment may include, but is not limited to the following;

- Obstruction of walkways forcing pedestrians onto the main carriageway.
- Interference with sight lines and/or distraction to road users.
- Associated fly-tipping and the subsequent presence / likelihood of vermin.

Notice periods for removal under S.143 will be applied if the Clothing bank is considered to be a nuisance.

Removal of Clothing Banks considered to be dangerous will be undertaken under the auspices of S.149.

Any decision to remove a Clothing Bank on the grounds of it presenting a danger will be recorded.

5 Removal Procedure

- Check the bank and obtain the details, including the charity number where possible.
- Check the charity number against the registered database.
- In the case of banks placed by registered charities, put a notice on them, contact the charity and ask for them to be removed in 7 days.
- In the case of non-registered charities, attempt to contact the owner to get them removed as soon as possible and no later than 2 days from notification. No exemptions to this timescale are to be given.
- In both cases, should the clothing bank not be moved within the set timescale enforcement procedures should be undertaken.
- Where a Clothing Bank is considered to present a danger - **interpreted at officer's discretion) regardless of ownership** - it is to be removed as soon as possible and stored, and the owner notified that it is available for collection within 28 days.
- Where a Clothing Bank is considered to be a nuisance, the relevant 28 day notice must be served before removal can take place.
- The clothing bank will be released back to the owner on receipt of a £500 storage and administration fee.
- If the clothing bank is not collected within 28 days, it is to be disposed of following the obtaining of an appropriate magistrates order and the contents are to be donated to a registered charity.

6 Financial Aspects/Costs to the Authority

Costs may be accrued due to the removal and disposal of clothing banks. S.149 (3) makes provision for the recovery of costs from the relevant third party.

Staff time and other associated costs relating to Clothing Bank Enforcement is to be recorded per case, so that appropriate charges may be levied as necessary.

7 Enforcement Timescales

- i. Given staff resources, no set inspection/enforcement schedule for clothing banks is to be introduced. Cases will be judged on an individual basis.
- ii. This policy relates to items either specifically reported to the Authority by the public or those directly encountered by officers on site in the course of their duties.
- iii. Initial responses to Clothing Bank complaints should be undertaken within 10 working days where possible. This may take the form of noting for action when visiting a particular area.
- iv. Where multiple complaints are received from a single source enforcement will be undertaken at officers discretion to allow time for other issues to be dealt with proportionately.

8 Notes

- v. This policy is to be reviewed annually following introduction.
- vi. Charges may be subject to inflation, or other operating costs.

Planning Transportation and Highways – Policy Document

Nuisance Vehicles on the Public Highway

Author Lindsey Greenwood
Revision Number 1
Date of Last Revision
Review Date

1 Background

The Clean Neighbourhoods and Environment Act 2005 mandates that vehicles should not cause a nuisance on the public highway therefore this policy sets out our procedures in dealing with such vehicles.

2 Council Position

The prevention of nuisance vehicles on the highway is a statutory power exercised by the Authority, delegated to Highway Enforcement Officer/Traffic Officer level and above.

Due to vehicles being a nuisance, causing an obstruction and causing possible problems to residents who live within its vicinity; Bradford MDC does not facilitate them on the public highway.

3 Relevant Enforcement Legislation

Clean Neighbourhoods & Environment Act	S.3	Exposing vehicles for sale on a road
Clean Neighbourhoods & Environment Act	S.4	Repairing vehicles on a road
Clean Neighbourhoods & Environment Act	S.105	Offences relating to pollution
Highways Act 1980	S.131	Penalty for damaging highways etc.
Highways Act 1980	S.137	Penalty for wilful obstruction
Highways Act 1980	S.149	Removal of things so deposited on highways as to be a nuisance etc.

4 Guidance for Officers

Definition of Highway

“Highway” in this instance is defined as either;

- Footway, verge and carriageway maintained at public expense
- The surface layers of any area considered to be a public right of way (including un-adopted streets) but *not* any areas of private land or private road that do not form a right of way.

A public right of way is determined as any roadway or footpath that is not maintained at public expense, is not designated as Private and – under common law - is defined as follows;

“A highway is a way over which all members of the public have the right to pass and re-pass.

Their use of the way must be as of right, not on sufferance or by licence”.

A private road is considered to be one signed as such or one that is closed to public by means of barrier or gate (or possibly simply by the presence of a barrier or gate). The onus on proof of a highway being classed as private lies with the landowner making the claim

The definitive record of Highway Maintained at Public expense is held by The City of Bradford MDC Highway Records Officer - Anisah Naz — 01274 433707 – anisah.naz@bradford.gov.uk

We cannot act to remove caravans or trailers placed on private land, but if by their placement they cause a problem on the highway we will attempt to contact the owner and ask for them to be moved to prevent a problem occurring.

Definition of a vehicle

A mechanically propelled vehicle intended for or adapted for use on the roads e.g. a car, motorbike, motorhome, bus, lorry, wagon etc.

Legislative interpretation

Exposing vehicles for sale on a road

Vehicles for sale on the Highway are a nuisance as they can obstruct walkways and roads and prevent others from parking their vehicle(s).

The Clean Neighbourhoods and Environment Act states that it is an offence to have two or more vehicles for sale from the same seller within 500 metres of each other at any one time on the highway.

A person guilty of such an offence will be liable to a fine usually undertaken under the auspices of the Clean Neighbourhoods and Environment Act 2005, Part 2, S.3

Repairing vehicles on a road

Vehicles being repaired on the Highway are a nuisance as they can obstruct walkways and roads and prevent others from parking their vehicle(s).

The Clean Neighbourhoods and Environment Act states it is an offence for a person to carry out restricted works to a vehicle on the highway if carried out ***for the purpose of a business or for gain/a reward.***

However, there is a 72 hour exemption to such works if they arise from an accident or breakdown (in certain circumstance a longer timeframe may be granted with prior permission from the local authority).

For the purpose of this policy restricted works is defined as repair, maintenance, servicing, improvement or dismantling any part of motor vehicle/accessory to a motor vehicle or, the installation, replacement or renewal of any such part or accessory or, the commercial cleaning, polishing and washing of vehicles.

A person guilty of such an offence will be liable to a fine usually undertaken under the auspices of the Clean Neighbourhoods and Environment Act 2005, Part 2, S.4

Other Considerations

An obstruction contravening parking restrictions (for example parking on double yellow lines or in an area where there is a permit scheme) should be referred to Parking Services/Council Wardens who will be able to issue a fixed penalty notice.

In relation to vehicles parked dangerously or causing an obstruction; the Authority has no powers to remove them. The application of laws for these offences is a Police matter and they are assessed at the discretion of the individual officer who attends the site. The Authority has no power of influence over Police decisions.

Vehicles that are believed to be untaxed and/or without an MOT situated on the highway can be checked and reported to the DVLA directly by members of the public (via the DVLA website).

However; if, in the course of our investigations, we encounter a vehicle that is untaxed and/or without an MOT we will place a sticker on the windscreen to advise removal and report it ourselves to the DVLA. Unfortunately we do not have the powers to remove these vehicles.

If we believe a vehicle to be abandoned we will pass the vehicles details to the Councils Abandoned Vehicles Team.

If a vehicle is contravening parking restrictions this should be referred to the Council Parking Services team.

Vehicles crossing the highway to access a property shall fall under the Councils '*Vehicle Crossings*' policy and procedure (this includes damage to the highway as a result of the vehicle crossing).

Vehicles persistently and inconsiderately parking on a grass verge and/or damaging it shall fall under the Councils '*Grass Verge*' policy and procedure.

Highways that have been damaged as a result of vehicles (and is not as a result of a vehicle crossing or persistent inconsiderate parking on a grass verge) shall fall under the Councils '*Damage to the Highway*' policy and procedure.

Caravans/trailers causing problems on the highway shall fall under the Councils '*Caravans & Trailers*' policy and procedure.

Motorised trailers used for advertising purposes shall fall under the Councils '*Fly Posting/Advertising on Street Furniture/Highway Land*' policy and procedure. However if the vehicle is untaxed or without an MOT these will be reported to the DVLA.

Motorised trailers used to sell food/for catering purposes shall fall under the Councils '*Food/Catering Trailers and Vehicles*' policy and procedure. However if the vehicle is untaxed or without an MOT these will be reported to the DVLA.

In exceptional circumstances and dependant on the nature of the complaint, there may be an opportunity to work collaboratively with other agencies to try and resolve an issue (such as the Police or DVLA).

5 Removal Procedure

Exposing vehicles for sale on a road

- We must be provided with the make, model and registration number of each vehicle that has been reported as being for sale on the highway. We are unable to take a complaint further without this information.
- We must be provided with details regarding how the vehicle is being advertised, for example a 'for sale' sign in the car window, a website (for which we would need details) or a business name etc. It would not be deemed reasonable for Council Officers with limited resources to scour all possible means of advertising in order to identify vehicles for sale on the highway.
- We are unable to take the case further if we cannot find the vehicles being advertised. Hearsay and suspicion alone is not sufficient evidence of vehicles being sold on the public highway and this would stand in a Court of Law.
- Check the details of the vehicles on the DVLA website to see if they are taxed or have a valid MOT.
- If the vehicles for sale have been advertised on a website we will investigate the relevant web page(s), cross reference the reported vehicles and if found we will take screen shots as evidence. A site visit will then be conducted.
- If it has been reported that there is 'for sale' signage in the vehicles we will conduct a site visit and take date stamped photographs as evidence.
- At the site visit we will also ensure there are two or more vehicles for sale within 500 meters and, if not evidenced by our previous investigations, we will check that the vehicles are being sold by the same seller. This may be the same contact number, the same style of for sale sign (font, size, layout etc.), the same dealership details or the vehicles for sale are parked in close proximity to a garage/business forecourt. Again, date stamped photographs will be taken for evidence.
- If the vehicles are for sale on the highway and meet the criteria as stated above we will place a notice sticker on each vehicle requesting that they are removed. Date stamped photographs will be taken of the sticker and in situ on the vehicle.
- Where possible we will discuss the matter with the seller and/or formalise this in writing.
- If the seller fails to remove the vehicles and continues to place them on the highway we, as the Highways Authority, will serve notice.
- If, over time, different vehicles are persistently found for sale on the highway which we can identify as belonging to the same seller (and we have evidence in support of this), legal proceedings will commence against them.
- ***If the vehicles are placed in a dangerous position on the highway (interpreted at an officers discretion) regardless of ownership – we will liaise with the police to remove them as soon as reasonably possible.***

Repairing vehicles on a road

- Repairing vehicles on a road may be as a result of business who do not have a suitable forecourt (such as a mechanics or a parts shop) or a lone worker running a business from their own home; regardless it is an offence for a person to carry out restricted works to a vehicle on the highway if carried out for the purpose of a business or for gain/a reward.
- Upon receipt of a complaint we must be provided with the details of the business/person who they believe to be carrying out repairs.
- We will investigate the site, take date stamped photographs of the area where work is being carried out, assess any potential damage to the highway caused by such works and collate the evidence.
- If we cannot obtain sufficient evidence to support the claim that vehicles are being repaired on the highway for the purpose of a business or for gain/a reward we are unable to take the complaint further.
- Where applicable will liaise with colleagues to ensure the business is registered as a trading company and if not we will highlight the issue with the relevant authorities.
- If there are vehicles present which are not taxed or without an MOT we will report these to the DVLA.
- If the person responsible for the work on the vehicles is present we will discuss the matter with them and request that they cease to operate from the area.
- Regardless on whether or not we have discussed the matter with the person responsible; we will put our finding in writing in the form of a letter which will also outline the course of action to be taken.
- If the person responsible does not refrain from repairing vehicles on the highway we, as the Highways Authority, will serve notice.
- If, over time, it becomes apparent that vehicles are persistently repaired on the highway and we can identify the same person as being responsible (and we have evidence in support of this), legal proceedings will commence against them.
- ***If the vehicles being repaired are placed in a dangerous positioned on the highway (interpreted at an officers discretion) regardless of ownership – we will liaise with the police to remove them as soon as reasonably possible.***

Use of Community Protection Notices (CPN)

CPN's are intended to be served in cases of antisocial behaviour. It is suggested that in order for a CPN to be issued a definitive pattern of repeat offences needs to be established.

In this instance it is suggested that after 5 separate repeat instances of enforcement issues relating to a person, sole trader or separate business, a CPN is considered as an additional enforcement tool.

The issuing of a CPN is a formal process that requires a consistent evidence base and a caution to be issued PRIOR to moving to formal stage.

The issuing of CPN's is covered in a separate policy document.

6 Financial Aspects/Costs to the Authority

Fixed Penalty notices issued as part of this process are to set at the following levels

- £75 per item

Staff time and other associated costs relating to nuisance vehicle enforcement is to be recorded separately at the following cost centre : **[to be determined for April 2018]**

7 Enforcement Timescales

- v. Given staff resources, no set inspection/enforcement schedule for caravans/trailers is to be introduced.
- vi. This policy relates to items either specifically reported to the Authority by the public or those directly encountered by officers on site in the course of their duties.
- vii. Initial responses to caravan/trailer complaints should be undertaken within 10 working days where reasonably possible. This may take the form of noting for action when visiting a particular area.
- viii. Where multiple complaints are received from a single source enforcement will be undertaken at officers discretion to allow time for other issues to be dealt with proportionately.

8 Notes

- vii. This policy is to be reviewed annually following introduction.

Revision Number

1

Date

March 2018

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Appendix B

Equality Impact Assessment Form

Reference – NRM/Enf/EIA

Department	Place	Version no	1
Assessed by	Lindsey Greenwood	Date created	28/02/2018
Approved by	Darren Badrock	Date approved	28/02/2018
Updated by	N/A – Initial Assessment	Date updated	N/A
Final approval	Richard Gelder	Date signed off	08/03/2018

The Equality Act 2010 requires the Council to have due regard to the need to

- eliminate unlawful discrimination, harassment and victimisation;
- advance equality of opportunity between different groups; and
- foster good relations between different groups

Section 1: What is being assessed?

1.1 Name of proposal to be assessed.

Highway Enforcement Policy Documentation

(Network Resilience & Management - Department of Place, Planning, Transportation and Highways)

1.2 Describe the proposal under assessment and what change it would result in if implemented.

Implementing the policies will ensure that the Network Resilience and Management Team - in relation to Highway Enforcement and operational matters - has an efficient, effective, consistent, fair, equitable and transparent approach to the legislative framework.

It will therefore have positive benefits for the safety of all highways users across the district and the local community as well as supporting us in dealing with counter accusations regarding enforcement and operational matters

Section 2: What the impact of the proposal is likely to be

- 2.1 Will this proposal advance equality of opportunity for people who share a protected characteristic and/or foster good relations between people who share a protected characteristic and those that do not? If yes, please explain further.**

In line with the Equalities Act 2010 and the relevant highways law(s) and legislation; this proposal will make sure that the Network Resilience and Management team gives due regard to enhancing equality of opportunity by ensuring the safety of all highways users across the district and allow them equal access to Council services which in turn will foster good relations between people with protected characteristics and those that do not.

Unfortunately; the nature of enforcement action and the implementation of operational matters naturally means that there will be disgruntled parties therefore applying the same procedures will protect us in the event of receiving counter accusations of enforcement/operational matters being carried out unfairly or without due regard.

- 2.2 Will this proposal have a positive impact and help to eliminate discrimination and harassment against, or the victimisation of people who share a protected characteristic? If yes, please explain further.**

The aim of this proposal is to achieve a positive impact and help eliminate discrimination and harassment by making sure we apply highways law and legislation equally and consistently to all. In doing so we will apply the same enforcement/operational procedures whilst giving due regard to the protected characteristics and this will ensure the safety of all highways users across the district and allow them equal access to Council services.

- 2.3 Will this proposal potentially have a negative or disproportionate impact on people who share a protected characteristic? If yes, please explain further.**

The nature of enforcement action – based on Highway Law – is a complex matter and we are aware that members of the public may not understand the reason for the application of legislation. As such there may be disgruntled parties who will be of the belief that any action taken will have a negative or disproportionate impact on them and/or, if applicable, a protected characteristic.

This is obviously not the case, and the application of consistent standards is key to maintaining a high standard of public engagement.

Where reasonably possible we will work with all parties in an attempt to achieve a satisfactory outcome in order to eliminate or reduce a negative or disproportionate impact on those with protective characteristics.

2.4 Please indicate the level of negative impact on each of the protected characteristics?

(Please indicate high (H), medium (M), low (L), no effect (N) for each)

Protected Characteristics:	<u>ENFORCEMENT</u> Impact: (H, M, L, N)	<u>OPERATIONAL MATTERS</u> Impact: (H, M, L, N)
Age	L	L
Disability	L	L
Gender reassignment	N	N
Race	N	N
Religion/Belief	N	N
Pregnancy and maternity	L	L
Sexual Orientation	N	N
Sex	N	N
Marriage and civil partnership	N	N
Additional Consideration:	Impact: (H, M, L, N)	Impact: (H, M, L, N)
Low income/low wage	M	N

2.5 How could the disproportionate negative impacts be mitigated or eliminated?

ENFORCEMENT

Enforcement action is applied to all those in breach of relevant highways laws and legislation regardless of age, disability, gender reassignment, race, religion/belief, pregnancy/maternity, sexual orientation, sex and marriage/civil partnership.

Bearing this in mind, any enforcement action should have a positive impact on those with protected characteristics as it will allow them equal rights to pass and re-pass on the public highway which in turn will ensure equal access to Council services.

As enforcement action is being carried out it may come to light that the reason for the breach of highways laws and legislation is as a result of a protected characteristic

Examples of this may include;

- An illegal vehicle crossing for disabled access
- Problems cutting back overhanging vegetation due to disability or low income/wage

When such an instance occurs we will (where reasonably possible) give due regard to individuals in order to mitigate the impact (for example multi agency working, making reasonable adjustments, giving alternative solutions and a number of opportunities throughout the process to rectify an issue prior to us taking action).

However; this will not deter from the fact that highways law needs to be adhered and by applying the policy and following the procedures set out we will ensure equality and safety for all highways users across the district.

OPERATIONAL MATTERS

Because of the nature of enforcement issues, any operational matters affecting those with protected characteristics will only be undertaken after informal methods have failed.

As such, initial mitigation measures will have already been put in place, lowering the impact of the necessary operation.

Section 3: Dependencies from other proposals

3.1 Please consider which other services would need to know about your proposal and the impacts you have identified. Identify below which services you have consulted, and any consequent additional equality impacts that have been identified.

ENFORCEMENT

No direct impact to other services.

OPERATIONAL MATTERS

We liaise with colleagues and partner organisations in order to cause the least disruption to highways users; including those with a protected characteristic.

Section 4: What evidence you have used?

4.1 What evidence do you hold to back up this assessment?

The evidence is based on extensive knowledge of past cases and team member experiences however; due to the format of these policies with set procedures laid out, the full impact cannot be determined or measured until they have been put into practice.

4.2 Do you need further evidence?

Moving forward, as these policies are implemented we will keep records of all complaints relating to a protected characteristic which has either come to us via the initial reporting of the issue or as a result of an enforcement action/operational matter. This will provide us with effective data to enable us to continuously re-evaluate this equality impact assessment in the future.

Section 5: Consultation Feedback

5.1 Results from any previous consultations prior to the proposal development.

As the proposals are new and relate to defined legislation, no consultation has been undertaken.

5.2 The departmental feedback you provided on the previous consultation (as at 5.1).

N/A

5.3 Feedback from current consultation following the proposal development (e.g. following approval by Executive for budget consultation).

The policies have been approved by:

- Strategic Director (Place)
- Assistant Director (Place)
- Portfolio Holder – Regeneration, Planning and Transport
- Legal Services
- Financial Services

5.4 Your departmental response to the feedback on the current consultation (as at 5.3) – include any changes made to the proposal as a result of the feedback.

No changes made to this EIA.

Appendix C

Typical Examples – Clothing Banks



Clothing bank sited on footway causing obstruction (less than 1.2m width to kerb)



Clothing bank on Highway verge attracting adjacent fly tipping.



Fly tipping around clothing bank adjacent to Highway



Dangerous clothing bank sited in sight line, on unstable base.

Typical Examples – Nuisance Vehicles



Commercial Vehicle Body obstructing Footway



Vehicle stored/being repaired on the highway by commercial business



Vehicle stored on footway for repairs by private individual



Vehicles parked on verge/footway waiting servicing and/or repair by commercial business

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Report of the Strategic Director of Place to the meeting of Executive Committee to be held on 3rd April 2018.

Subject:

BN

Review and modification of Bradford's implementation of the Yorkshire Common Permit Scheme

Summary statement:

This report sets out changes in the Department for Transport's approach to Street Works and seeks Executive's approval to modify the existing permit scheme in order to adopt an all streets scheme.

Steve Hartley
Strategic Director - Place

Portfolio:

Regeneration, Planning and Transport

Report Contact: Darren Badrock
Phone: (01274) 437420
E-mail: darren.badrock@bradford.gov.uk

Overview & Scrutiny Area:

Environment & Waste Management

1. SUMMARY

- 1.1 This report sets out changes in the Department for Transport's approach to Street Works and seeks Executive's approval to modify the existing permit scheme in order to adopt an all streets scheme.

2. BACKGROUND

- 2.1 The Traffic Management (City of Bradford Metropolitan District Council) Permit Scheme order 2015 came into effect on 31st March 2015, and is currently moving towards the end of its third year.
- 2.2 Responsibility for the implementation of the scheme was assigned to the Network Resilience and Management Team (NRM) following the Planning Highways and Transportation Restructure in 2014/15.
- 2.3 The current Permit Scheme is limited to operating only on the busiest roads in the district, which equates to approximately 32% of the total highway network. This arrangement was deemed by the Department for Transport (DfT) – at the inception of the scheme - to be adequate to ensure direct benefits to the local economy.
- 2.4 The remaining 68% of the Highway network is currently managed using a noticing scheme as per the requirements of the New Roads and Street Works Act 1991 (NRASWA)
- 2.5 At a recent meeting with the Joint Authorities Group (UK) Manager, Traffic Managers from Yorkshire Authorities were advised of DfT plans to modernise various elements of street works projects, including new recording software, development, plans for autonomous vehicles and further procedures to reduce disruption from street works.
- 2.6 A key element of this modernisation is the introduction of a new national, cloud-based, street works management system – “Street Manager” – which is to be introduced in August 2019.
- 2.7 DfT have indicated that their preferred method for managing street works under this new system is the adoption of an “all streets” permit scheme and as such action is required to move to such a standard.
- 2.8 Changes to the existing permit scheme will require significant development and stakeholder consultation. Based on experience gained from the initial scheme implementation this is likely to be a nine month process in total, hence the need for an early decision on this matter.
- 2.9 Given the August 2019 deadline for the implementation of new software, it is suggested that Bradford MDC looks to adopt a start date of April 2019 for an all-street scheme, which will allow for a smoother transition to new working methods and systems.

3. OTHER CONSIDERATIONS

- 3.1 Following its inception in 2015, mandatory annual reports have been undertaken to analyse the effectiveness of the permit scheme.
- 3.2 The annual report for 2015/16 showed a significant increase in the number of street works in the district that was mitigated by a minor average increase in street work duration, indicating that the scheme was displaying benefits.
- 3.3 The annual report for the 2016/17 financial year showed an average reduction of 1.41 days duration of street works across the district, amounting to a calculated saving to the local economy of approximately £0.5m (based on Department for Transport Web tag Figures) – this equates to a total of 40,944 hours of delay saved and indicates that the scheme is performing as expected in line with the original cost-benefit analysis.
- 3.4 Whilst the benefits of expanding the scheme are not directly scalable, this suggests that there are considerable benefits to moving to an all-street scheme that enables better controls over works being undertaken across the whole district.
- 3.5 In the wider Yorkshire region, Barnsley and Doncaster are currently transitioning to all-street schemes. North Yorkshire County Council has also recently launched an all-streets scheme.
- 3.6 In West Yorkshire, Leeds and Kirklees are currently assessing the benefits of an all-street scheme. Calderdale and Wakefield have yet to declare their intent on the matter.
- 3.7 The Yorkshire and Humber Traffic Managers Group have proposed that a working party be set up to evaluate a transition to all-street permit schemes that includes scope for inclusion of Lane Rental charging as a complimentary works management method.

4. FINANCIAL & RESOURCE APPRAISAL

- 4.1 Permit Schemes are cost-neutral and entirely self funded through fee and fixed penalty notice collection.
- 4.2 Any recovered charge or fee is to be retained and used to pay for the administration of the scheme. Any surplus raised through fixed penalty noticing may be used for the betterment of the scheme and to incentivise better operational behaviours.
- 4.3 Currently the NRM team employ the equivalent of 5 FTE dedicated to the existing permit scheme and 7 FTE to general NRASWA duties. Existing NRASWA staff will transition to permit duties, however it is anticipated that additional staff resources will be required to assist the management of an all-street scheme as the level of works assessment required is greater. An indicative figure of up to 6 additional FTE's is suggested; however this may be less - the exact number of additional staff is to be determined by a DfT developed work analysis procedure.

5. RISK MANAGEMENT AND GOVERNANCE ISSUES

- 5.1 Despite investment from utility companies, Bradford has aging utility infrastructure that requires constant maintenance and improvement – in 2016/17 nearly 16,000 works were undertaken in the district. It is likely that this number will be maintained and may increase further, causing significant pressure on the highway network if not coordinated correctly
- 5.2 A failure to move to an expanded all-street scheme may result in utility companies prioritising their resource planning for street works in those authorities which are already running such a scheme. This could result in deterioration of the current level of coordination and planning of works in Bradford by utility companies, and reverse the progress that has been made to date.
- 5.3 Furthermore, a failure to adopt such a scheme may cause issues during the implementation of the Street Manager system and an inability to provide DfT with relevant information that may be crucial to the development of the local economy in terms of journey time reliability, reduced delays, use of autonomous vehicles and other wider economic benefits.

6. LEGAL APPRAISAL

- 6.1 When developing any new or varying its current permit scheme, the Council must comply with all relevant legislation and have regard to statutory guidance in force at the time of the proposed change. Currently this comprises the Traffic Management Act 2004 (as amended) (“the 2004 Act”), the Traffic Management Permit Scheme (England) Regulations 2007 (as amended) (“the 2007 Regulations”), the Department for Transport’s Statutory Guidance for Highway Authority Permit Schemes (October 2015).
- 6.2 Prior to 2015 all permit schemes were required to be submitted to and approved by the Secretary of State. The Deregulation Act 2015 amended the 2004 Act to enable highway authorities to make their own schemes and to vary or revoke their existing ones. Thus as a matter of principle, the Council has the statutory power to bring forward an all street permit scheme.
- 6.3 However, it must ensure that all aspects of any new, or variation to the existing, permit scheme comply with the 2007 Regulations, before making the order giving effect to it. It has to consult those identified in Regulation 3(1) of the 2007 Regulations explaining the reasons therefor. And at least four weeks’ prior notice of the order implementing the scheme must be provided to the relevant stakeholders set out in the 2007 Regulations before the new or revised scheme comes into effect.
- 6.4 The Executive should note that the development of any scheme will be in accordance with the Department of Transport’s guidance; and changes to the current permit scheme will ultimately require Legal Services to review and final approval by the City Solicitor. This will mitigate the risk of any failure to comply with the requisite legal framework.

6.5 When making decisions, the Council's Executive must have due regard to the need to eliminate unlawful conduct under the Equality Act 2010, the need to advance equality of opportunity and the need to foster good relations between persons who share a protected characteristic and those who do not (the public sector equality duty). A proportionate level of analysis is required to discharge the duty. Paragraph 7.1 of this Report indicates that equality impact assessments will be undertaken to assess the potential for any adverse equality issues arising before the order giving effect to any revised permit scheme is made.

7. OTHER IMPLICATIONS

7.1 EQUALITY & DIVERSITY

7.1.1 Equality impact assessments are to be undertaken for the adoption of any new permit scheme arrangements. A move to all streets could potentially assist some protected characteristic groups by an enhanced inspection regime/ monitoring system

7.2 SUSTAINABILITY IMPLICATIONS

7.2.1 There are no sustainability implications in relation to this matter.

7.3 GREENHOUSE GAS EMISSIONS IMPACTS

7.3.1 Better management of road and street works will result in reductions in vehicle emissions.

7.4 COMMUNITY SAFETY IMPLICATIONS

7.4.1 Better management of road and street works sites will raise standards in signing, lighting and guarding of works, enhancing community safety

7.5 HUMAN RIGHTS ACT

7.5.1 There are no human rights implications in relation to this matter.

7.6 TRADE UNION

7.6.1 Adoption of any new scheme will require the addition of new staff to the Authority as outlined in 4.3 above, and all relevant trade union consultations will be undertaken as part of the process.

7.7 WARD IMPLICATIONS

7.7.1 Better management of road and street works will be of benefit to constituents in all wards.

8. NOT FOR PUBLICATION DOCUMENTS

8.1 None

9. OPTIONS

- 9.1 Executive may wish to approve the expansion of the current permit scheme to all-streets, with a commencement date of 1st April 2019 - this is the preferred option.
- 9.2 Executive may wish to keep the current permit scheme in place, and make no changes at this time

10. RECOMMENDATIONS

- 10.1 That the Strategic Director of Place, in consultation with the Portfolio Holder for Regeneration, Housing, Planning and Transport, be given delegated authority:
 - a. To consult all relevant stakeholders, including local Ward Councillors, in relation to the arrangements for the implementation of an All Street Permit Scheme in the Bradford District.
 - b. That following completion of the aforesaid consultation, to approve the details of the operation and scope of an All Street Permit Scheme and the making of relevant legal orders - in conjunction with the City Solicitor - to implement the scheme at the earliest possible opportunity and no later than 1st April 2019.
 - c. To develop and implement any future street works management methods and systems proposed by DfT
- 10.2 That the Strategic Director of Place, in consultation with the Director of Finance and Portfolio Holder for Regeneration, Housing, Planning and Transport be granted delegated authority to approve and implement the financial aspects of any scheme.

11. APPENDICES

- 11.1 Permit Scheme Evaluation Report - Tranche 2 Authorities The City of Bradford Metropolitan District Council Year 2 – 2016/2017

12. BACKGROUND DOCUMENTS

- 12.1 New Roads and Street Works Act 1991
- 12.2 Traffic Management Act 2004
- 12.3 The Traffic Management (The City of Bradford Metropolitan District Council) Permit Scheme Order 2015 (as amended)
- 12.4 Report of the Strategic Director: Regeneration & Culture to the meeting of Executive to be held on 3 December 2013 – “Introduction of the Yorkshire Common Permit Scheme (Traffic Management Act 2004) within the Bradford District”
- 12.5 Government response to consultation on the future of lane rental (February 18)

Appendix A

Permit Scheme Evaluation Report - Tranche 2 Authorities The City of Bradford
Metropolitan District Council Year 2 – 2016/2017

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Yorkshire Common Permit Scheme for Road Works and Street Works

Permit Scheme Evaluation Report Tranche 2 Authorities

The City of Bradford Metropolitan District Council Year 2 – 2016/2017



Contents

1	Executive Summary	<u>3</u>
2	Introduction	<u>4</u>
3	Objectives of the Yorkshire Common Permit Scheme	<u>5</u>
4	Fee structure	<u>7</u>
5	Costs and Benefits	<u>9</u>
6	Performance Indicators	<u>11</u>
7	TPI measures	<u>19</u>
8	Authority Measures	<u>20</u>
9	Conclusion	<u>25</u>
10	Glossary	<u>27</u>
10	Appendix	<u>29</u>

1 Executive Summary

The Yorkshire Common Permit Scheme (YCPS) commenced operation on the 12th June 2012 and was initially operated in six authority areas (Barnsley, Doncaster, Kirklees, Leeds, Rotherham and Sheffield.) The scheme benefits were assessed by Bradford, Calderdale and Wakefield districts, commonly known as the Tranche 2 (T2) Authorities and was subsequently adopted and brought into operation in those areas on 31st March 2015.

The scheme focuses attention on the strategically sensitive highway network and the New Roads and Street Works Act (NRSWA), noticing rules apply on the remainder of the highway network.

The T2 Authorities consulted utility stakeholders prior to adopting the YCPS and committed to work within the existing governance arrangements and working parties developed as part of Tranche 1. This included a commitment for a T2 Authority to co-chair the Yorkshire Permits Operational Group to ensure a successful transition. This, combined with assistance from the Tranche 1 Authorities has resulted in a successful adoption of the scheme.

This is the second annual evaluation of the T2 Authorities within the YCPS covering the period from 31st March 2016 to 31st March 2017. The report evaluates the progress of the permit scheme in meeting both the stated objectives and parity of treatment of both works for road purposes and utility street works.

The main objectives of the Scheme were to minimise delay and reduce disruption arising from works on the highway, and to demonstrate parity of treatment amongst all works promoters.

In the second reporting year, Bradford MDC has adopted the HAUC (England) Report Template for the Evaluation of Permit Schemes, and – as per the requirements of the guidance given and the 2015 Amendment Regulations, is reporting solely on the operation of the scheme in Bradford District.

In compiling the data, the limitations of the reports available to the Authority via the EToN reporting system has meant that some performance indicators cannot be reported on. It is anticipated that through support of the EToN provider such data can be collated in the future.

In the 16/17 operating year of the scheme 6899 PAA applications, Permit Applications, Variation Applications and Permit Modification requests were received, checked and coordinated. 730 Permits were refused.

In the first reporting year Bradford MDC reported an increase in average days of occupation from 7.11 to 7.14 days – this was seen as an anomaly due to a high variance in promoter works programmes.

This perception has been vindicated in the second year of scheme operation where average days of occupation has decreased from 7.14 to 5.74 days – an average reduction 1.41 days, which equates to 1706 days of occupation across the year.

This reduction has occurred despite an increase in the number of works from 3653 in 15/16 to 3695 in 16/17, further highlighting the effectiveness of the scheme.

Permit refusal rates between Authority promoted works and Utility promoters (Section 6.1) remain consistent based on the respective number of works undertaken – within 1% of each other with the refusal rate for Authority applications slightly higher - and demonstrates parity of application.

Bradford MDC remains committed to work with the promoters who have higher refusal rates in order to attempt to reduce the number of refusals across the 17/18 operating year.

Accuracy of information supplied by works promoters continues to improve, with more accurate dates, plotting of works and traffic management information being available to coordinators, works promoters and road users. This has given confidence in publishing data from the authorities' register to Roadworks.org. This enables better information to be provided to road users and the public, as well as providing permit authorities and all work promoters with an effective coordination tool.

Overall, the performance of the Scheme during its first and second full year of operation has demonstrated that it is meeting the objectives that were set-out at the inception of the scheme. It is providing the authority with a valuable tool to help co-ordinate works, reduce delay and minimise disruption that shows a benefit to the local economy.

It has also encouraged more effective and efficient communication between permit authorities, all work promoters and highway users.

This second annual report has highlighted some areas where further development of the scheme and improved reporting capabilities are required to evaluate and maximise the scheme benefits. Work will continue with all stakeholders to achieve these goals and continue the successes achieved in the first and second evaluation period.

2 Introduction

The Traffic Management Act 2004 (TMA), Part 3 Sections 32 to 39, and the Traffic Management Permit Scheme (England) Regulations 2007 make provision for Permit Schemes to be introduced in England. The Traffic Management (City of Bradford Metropolitan District Council) Permit Scheme Order 2015 (commonly known as the “Yorkshire Common Permit Scheme” was adopted by The City of Bradford Metropolitan District Council on 31st March 2015 and has been amended to reflect the requirements introduced in 2015 as required.

This report sets out an overview of Yorkshire Common Permit Scheme operational performance in its second year. The report provides detailed scrutiny of the available data in relation to street works and activities in Bradford.

3 Objectives of the Yorkshire Common Permit Scheme

The objectives of Yorkshire Common Permit Scheme were laid out in Section 3 of the Yorkshire Common Permit Scheme, The City of Bradford Metropolitan District Council Scheme Supplementary Information. These are summarised below along with how they have been met.

1) Key Objective:

- Minimising delay and reducing disruption to road users arising from road and street works activity.

2) Parity Objective:

- Ensuring parity between promoters of street works and works for road purposes.

3) Supplementary Objectives:

- To protect the structure of the street and the integrity of apparatus in it.
- To encourage proactive, rather than reactive, attitudes to activities by promoters. The change in culture should result in the supply of more information to permit authorities, which will better enable them to manage their network, coordinate activities within their area and across adjacent authorities' areas, and reduce disruption to users of the highway. Information on road works and street works is provided to the general public enabling informed journey choices.
- To ensure safety for those using, living or working on the street, including those engaged in activities controlled by the Permit Scheme.
- To improve activity planning by all promoters.
- An aid to help public transport efficiencies.

4) Transport Objectives

- To make substantial progress towards a low-carbon transport system.
- To improve connectivity to support economic activity and economic growth.
- To enhance the quality of life of people in the region's diverse communities, and visitors and commuters to the region (including health, safety, equality, air quality, noise and the natural environment).

Any activity carried out in the street has the potential to cause disruption depending on how long it lasts, where it is carried out, its scale and potential relation to other activities which may be taking place. The YCPS created an opportunity to realise a number of benefits to road users, local residents and businesses in the Yorkshire

area through better control, planning and coordination of works, and a more robust framework for checking and challenging activities on the highway.

The YCPS intends to ensure that the conditions of the permit promote the expeditious movement of traffic through road works, reducing disruption and promoting safety at road and street works sites.

4 Fee structure

The Traffic Management Permit Scheme (England) (Amendment) Regulations 2015 require that the permit authority shall give consideration to whether the fee structure needs to be changed in light of any surplus or deficit;

The Traffic Management Act 2004 introduced the concept of permits for works on the street as a tool for local highway authorities to reduce the disruption caused by those works.

Separate permit regulations set out many of the details for how schemes will operate and include the powers for an authority to set up a scheme in which fees may be charged to statutory undertakers.

The permit regulations state that the income from fees must not exceed the proportion of costs for operating the permit scheme incurred in relation to statutory undertakers. The permit code of practice supplements this by stating that the fee income should only cover the extra costs incurred in relation to statutory undertakers over and above the costs of carrying out the previous coordination duty under the New Roads and Street Works Act 1991.

The Traffic Management (City of Bradford Metropolitan District Council) Permit Scheme Order 2015 commenced operation on 31 March 2015 as part of the Yorkshire Common Permit Scheme.

In making an application to the Secretary of State each authority provided their proposed permit fees for each category of work and a comprehensive justification of those fee levels using the Department for Transport (DfT) matrix. In completing the matrix, care was taken to follow the advice contained in the Permit Fees Guidance published by the DfT.

Each authority originally committed to undertake an annual review of the permit fees and an initial review to identify and evaluate the sums paid by way of fees and the prescribed costs of operating the scheme. Following each evaluation if fee income has exceeded the prescribed costs the necessary adjustments will be made in the subsequent year's fee levels.

Under legislation from 1st October 2015, any adjustment of the fee levels will require an Order application to be made and signed by the Chief Officer of Highways and Transportation.

The first annual fee review was undertaken to cover the period 1 April 2015 to 31 March 2016. This review showed that costs were 0.18% less than the permit income.

The second annual fee review was undertaken to cover the period 1 April 2016 to 31 March 2017. This review showed that costs were 0.6% greater than the permit income.

4.1 Permit Fee Review Methodology

4.1.1 Review Period

This second full review of the permit fee levels covers the period from 1 April 2016 to 31 March 2017 inclusive.

4.2 Permit Fees

The current City of Bradford Metropolitan District Council Permit Fees and the maximum fee levels are shown in the table below;

Table – Fee levels per permit or Provisional Advance Authorisation		
	Bradford MDC Permit Fee	Maximum allowable fee (DfT)
Provisional Advance Authorisation	£100	£105
Major works – over 10 days and all major works requiring a traffic regulation order.	£206	£240
Major works – 4 to 10 days	£130	£130
Major works – up to 3 days	£65	£65
Standard activity permit	£125	£130
Minor activity permit	£62	£65
Immediate activity permit	£57	£60

4.3 Permit Fee Income

Invoices for allowable permit fees are sent to statutory undertakers for payment monthly. The total invoiced amounts over the review period have been included in the table below. The total amount over the review period forms the income element of the income and cost comparison.

5 Costs and Benefits

Costs

Bradford MDC utilises an electronic time recording system, for all staff involved in the permit scheme operation. Separate time recording codes have been established for utility permits, highway permits, and management of the permit scheme. Other time codes are also used for activities not related to the permit scheme, such as works on non-permit streets, street works inspections, street works co-ordination and Highways Act licensing.

Prior to the commencement of the scheme staff were instructed to accurately record their time spent on the various activities. The time recording system also contains all the related financial information such as staff hourly rates, National Insurance, superannuation and overheads. The system allows accurate, up to date costs to be extracted and this has been utilised to produce the staff cost field in the comparison table.

A number of operational costs were identified, including administration, training and associated IT equipment/systems maintenance - 32% of these costs were attributed to the Permit Scheme (32% being the percentage by length of permit streets compared to the total length of Highway Network in The City of Bradford MDC district).

Care has been taken to ensure that they are permit specific costs and that they have been adjusted to ensure that they represent costs over and above the equivalent costs under the previous NRSWA duty.

Permit Fee Income and Allowable Cost Comparison

The City of Bradford MDC Permit Fee Review – 1 April 2015 to 31 March 2016

Proportion of Permits Granted

	Authority		Statutory Undertakers	
Month	Number	%	Number	%
Total	1184	21	4493	79

Permit Scheme Costs for Statutory Undertakers

Month	Operational Costs	Staffing Costs	Total Costs
Total	£14149.76	£289164.68	£303680.94

Permit Scheme Income

Total Permit Fees
£301,825.00

The comparison tables above show that The City of Bradford MDC has agreed permit invoices with Statutory Undertakers totalling **£301,825.00** during the review period.

The allowable costs that The City of Bradford MDC has incurred relating to Statutory Undertakers permit applications is **£303,690.94** during the review period.

The allowable cost is 0.6% more than the amount invoiced to statutory undertakers in permit fees. This loss to the Authority is partly balanced with the over recovery figure of 0.18% during 2015/16 financial year and the minor variance suggests that the scheme is operating correctly. This figure will be monitored annually as required to ensure fees are appropriately costed.

Taking into account the levels of income, against allowable costs it does not appear that any amendment of the fee levels is required at this stage. This will be monitored and assessed at the end of year two of the Permit Scheme.

It is recommended that the permit fees should remain at the levels set until the next fee review is undertaken.

The Traffic Management Permit Scheme (England) (Amendment) Regulations 2015 require that the permit authority also shall give consideration to whether the permit scheme is meeting key performance indicators where these are set out in the Guidance.

Benefits

As a result of the implementation of the scheme in the 2016/17 financial year there has been an average saving of 1.41 days duration across all works within the district.

This equates to 1706 days which - when applying the figure of £11.74 per hour for average vehicle delay across the day (as identified in the initial permit scheme cost benefit analysis, derived from the WebTAG Data Book – 2010 prices and values) – suggests an overall saving to the local economy of **£480,682.64**

6 Performance Indicators

6.1 PI1 The number of permit and permit variation applications

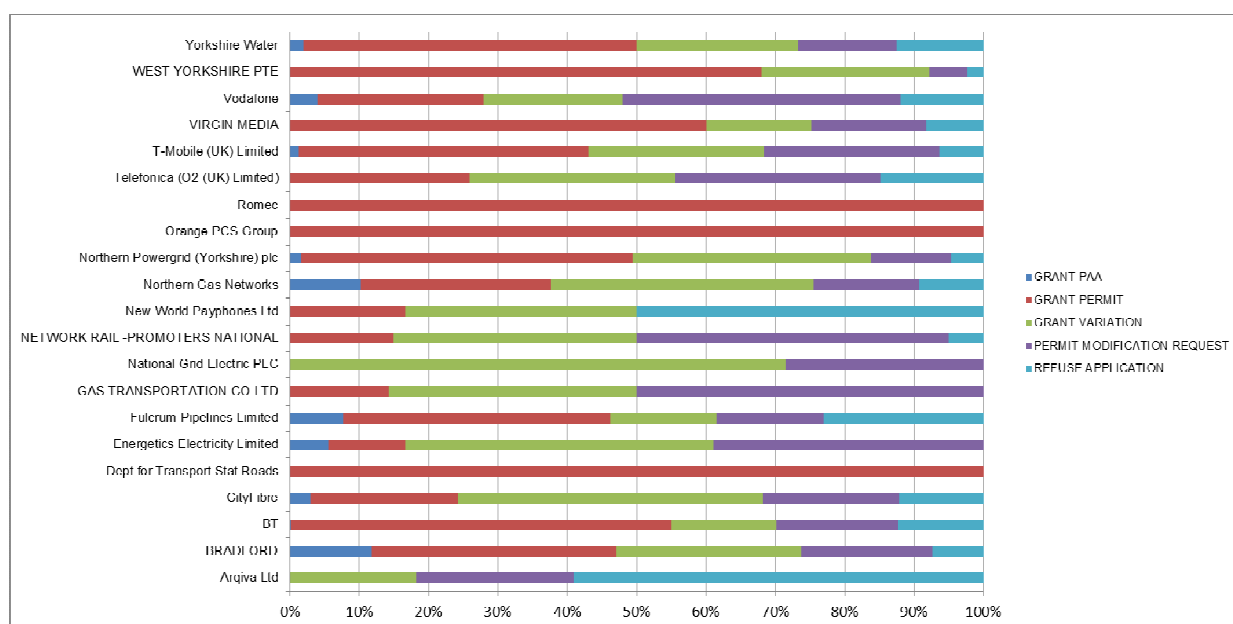
The number of permits and permit variation applications received, the number granted and the number refused and shown as:

- The total number of permit and permit variation applications received, excluding any applications that are subsequently withdrawn
- The number of applications granted as a percentage of the total applications made
- The number of applications refused as a percentage of the total applications made.

6.1.1 Results

The chart below shows the number of all permit applications received, the number of permit applications granted and the number of permit applications refused

Chart 1– The Number of PAA, Permit and Permit Variation Applications Received, the Number Granted and the Number Refused



Permits Granted and Refused

The table below shows a breakdown of permit applications received, granted and refused for the second year of operation in Bradford.

Table 1 – Permits Granted and Refused

Description	Highway Authority		Utilities	
	No.	%age of total	No.	%age of total
Permits/Variations granted	1184	73.68	4493	74.61
Permits/Variations refused	423	26.32	1529	25.39
Total	1607	100.00	6022	100.00

The tables below show a breakdown of the data into applications granted and refused in relation to highway authority works for road purposes and works by utility promoters, and provide a comparison with the percentage of permits granted in 2015/16 for the same periods. Also, the data is further broken down by activity type into applications granted and refused.

Table 2 – Works for Road Purposes 2015/16

Works for Road Purposes (2015/16)	Number	% of Total
Total Permit Applications received by Bradford MDC during 2015/16 year of scheme	1648	
Total Permit variation applications received by Bradford MDC during 2015/16 year of scheme	280	
Total permits with a status that cannot be determined	0	
Total Permits granted or refused	1648	
Total Granted	1369	83.07
Total Refused	279	16.93

Table 3 – Utility Promoters 2015/16

Utility Promoters (2015/16)	Number	% of Total
Total Permit Applications received by Bradford MDC during 2015/16 year of scheme	2692	
Total Permit variation applications received by Bradford MDC during 2015/16 year of scheme	1344	
Total permits with a status that cannot be determined		
Total Permits granted or refused	5111	
Total Granted	4036	78.97
Total Refused	1075	21.03

Table 4 – Works for Road Purposes 2016/17

Works for Road Purposes (2016/17)	Number	% of Total
Total Permit Applications received by Bradford MDC during 2016/17 year of scheme	756	
Total Permit variation applications received by Bradford MDC during 2016/17 year of scheme	428	
Total permits with a status that cannot be determined	0	
Total Permits granted or refused	1607	
Total Granted	1184	73.68
Total Refused	423	26.32

Table 5 – Utility Promoters 2016/17

Utility Promoters (2016/17)	Number	% of Total
Total Permit Applications received by Bradford MDC during 2016/17 year of scheme	2940	
Total Permit variation applications received by Bradford MDC during 2016/17 year of scheme	1553	
Total permits with a status that cannot be determined	0	
Total Permits granted or refused	6022	
Total Granted	4493	74.61
Total Refused	1529	25.39

Table 6 - Applications Granted by Activity Type 2015/16

Promoter Organisation Name	IMMEDIATE (EMERGENCY)	IMMEDIATE (URGENT)	MAJOR	MINOR	STANDARD	Grand Total
BRADFORD	477	7	172	370	343	1369
BT	35	53	4	538	83	713
Energetics Electricity Limited			2		3	5
ES Pipelines Ltd				1	1	2
GAS TRANSPORTATION CO LTD					2	2
Kingston Communications (CSO)				20		20
National Grid Electric PLC				2		2
NETWORK RAIL -PROMOTERS NATIONAL	1		4	12	3	20
New World Payphones Ltd					1	1
Northern Gas Networks	284	15	187	82	234	802
Northern Powergrid (Yorkshire) plc	25	483	26	129	195	858
Romec	1			1		2
Telefonica (O2 (UK) Limited)			2	15		17
T-Mobile (UK) Limited				44		44
VIRGIN MEDIA	4	29	2	335	4	374
Vodafone		1	5	22		28
WEST YORKSHIRE PTE	1	5		45		51
Yorkshire Water	31	424	23	501	116	1095
Grand Total	859	1017	427	2117	985	5405

Table 7 - Applications Granted by Activity Type 2016/17

Promoter Organisation Name	IMMEDIATE (EMERGENCY)	IMMEDIATE (URGENT)	MAJOR	MINOR	STANDARD	Grand Total
Arqiva Ltd				3	1	4
BRADFORD	142	20	344	358	320	1184
BT	59	37	7	428	47	578
CityFibre		1	6	23	15	45
Dept for Transport Stat Roads				1		1
Energetics Electricity Limited			6	3	2	11
Fulcrum Pipelines Limited			2	4	2	8
GAS TRANSPORTATION CO LTD					7	7
National Grid Electric PLC					5	5
NETWORK RAIL -PROMOTERS NATIONAL				8	2	10
New World Payphones Ltd				3		3
Northern Gas Networks	183	10	337	76	161	767
Northern Powergrid (Yorkshire) plc	2	410	38	121	178	749
Orange PCS Group				1		1
Romec				5		5
Telefonica (O2 (UK) Limited)		1		27	2	30
T-Mobile (UK) Limited			2	51	1	54
VIRGIN MEDIA	4	37		448	10	499
Vodafone			1	11		12
WEST YORKSHIRE PTE	1	3		114		118
Yorkshire Water	35	435	94	882	140	1586
Grand Total	426	954	837	2567	893	5677

Table 8 - Applications Refused by Activity Type 2015/16

Promoter Organisation Name	IMMEDIATE (EMERGENCY)	IMMEDIATE (URGENT)	MAJOR	MINOR	STANDARD	Grand Total
BRADFORD	54	1	38	95	91	279
BT	4	8	5	200	34	251
Energetics Electricity Limited			1		4	5
ES Pipelines Ltd				1		1
GAS TRANSPORTATION CO LTD					1	1
Kingston Communications (CSO)				3		3
National Grid Electric PLC				4		4
NETWORK RAIL -PROMOTERS NATIONAL				3		3
New World Payphones Ltd				2	2	4
Northern Gas Networks	47	2	60	22	91	222
Northern Powergrid (Yorkshire) plc	2	49	10	34	65	160
Telefonica (O2 (UK) Limited)			2	5		7
T-Mobile (UK) Limited			1	19		20
VIRGIN MEDIA	2	6		94	3	105
Vodafone		2	2	10	2	16
WEST YORKSHIRE PTE				7		7
Yorkshire Water	9	36	12	180	29	266
Grand Total	118	104	131	679	322	1354

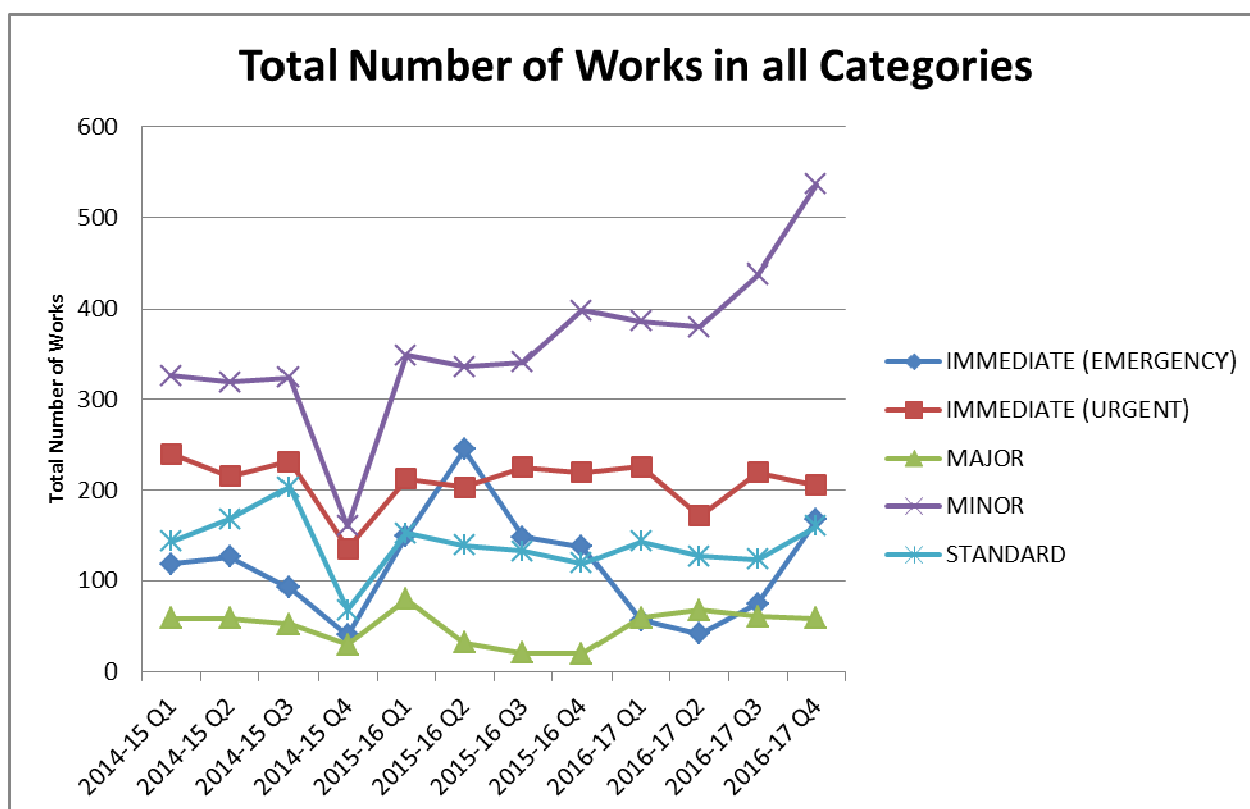
Table 9 - Applications Refused by Activity Type 2016/17

Promoter Organisation Name	IMMEDIATE (EMERGENCY)	IMMEDIATE (URGENT)	MAJOR	MINOR	STANDARD	Grand Total
Arqiva Ltd				14	4	18
BRADFORD	36	2	64	170	151	423
BT	17	4	2	186	37	246
CityFibre			3	10	8	21
Energetics Electricity Limited			2	1	4	7
Fulcrum Pipelines Limited			3		2	5
GAS TRANSPORTATION CO LTD					7	7
National Grid Electric PLC					2	2
NETWORK RAIL -PROMOTERS NATIONAL				9	1	10
New World Payphones Ltd				3		3
Northern Gas Networks	47	3	74	24	100	248
Northern Powergrid (Yorkshire) plc	1	54	8	32	50	145
Telefonica (O2 (UK) Limited)				21	3	24
T-Mobile (UK) Limited			2	23		25
VIRGIN MEDIA		13		141	11	165
Vodafone			1	12		13
WEST YORKSHIRE PTE		1		9		10
Yorkshire Water	14	116	37	346	67	580
Grand Total	115	193	196	1001	447	1952

Table 10 – Total number of Works in all Categories

Quarter	IMMEDIATE (EMERGENCY)	IMMEDIATE (URGENT)	MAJOR	MINOR	STANDARD	Grand Total
2014-15 Q1	118	240	58	326	143	885
2014-15 Q2	126	215	58	319	168	886
2014-15 Q3	92	231	52	324	203	902
2014-15 Q4	40	135	29	160	67	431
2015-16 Q1	149	212	79	349	152	941
2015-16 Q2	245	203	31	336	139	954
2015-16 Q3	148	225	20	341	132	866
2015-16 Q4	137	219	19	398	119	892
2016-17 Q1	56	226	59	386	143	870
2016-17 Q2	41	171	67	380	127	786
2016-17 Q3	74	219	60	437	123	913
2016-17 Q4	167	205	58	536	160	1126

Chart 2 – Total Number of Works in all Categories



The following considerations must be noted in relation to this data;

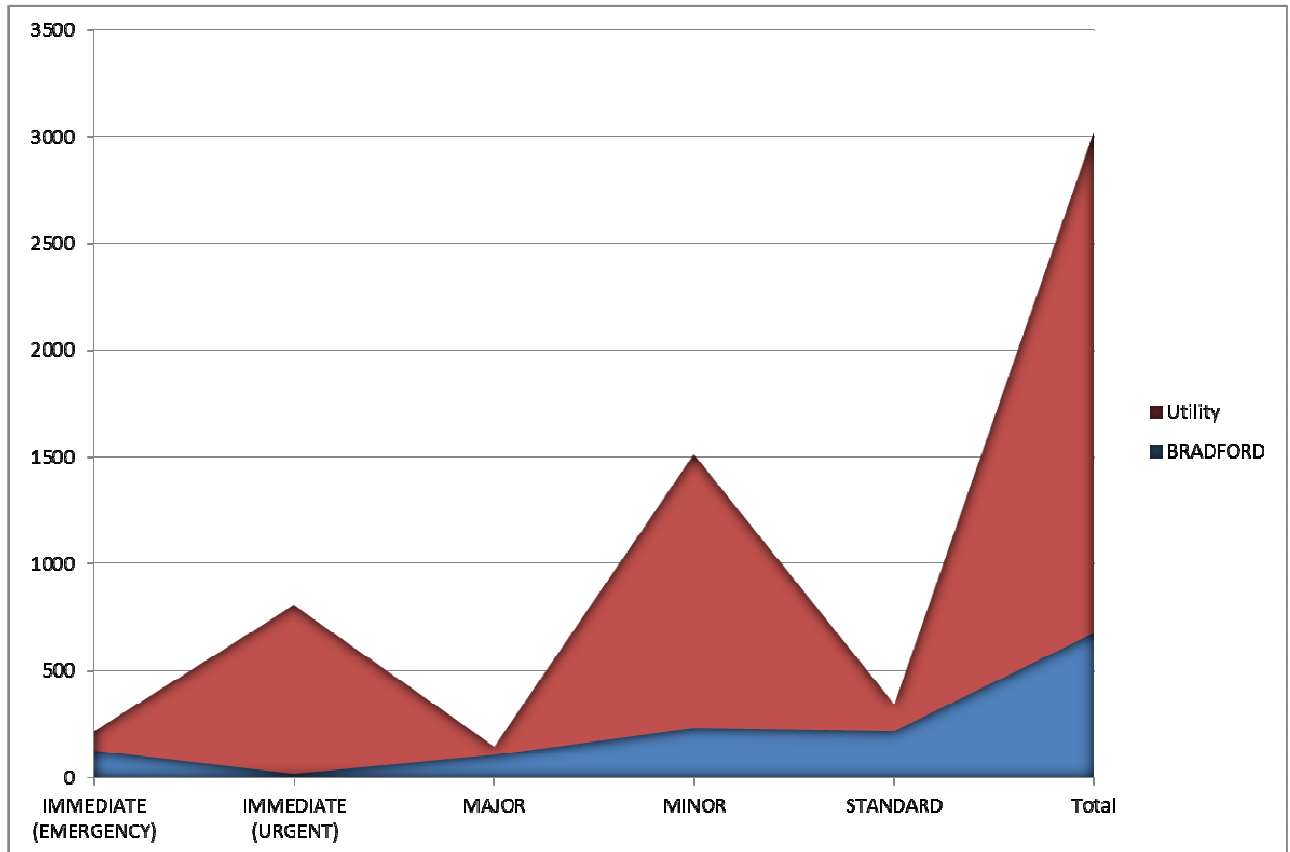
Each application has an appropriate response period which means that the number of applications received in any one period does not correspond to the permits granted and refused within that same period. In other words, a permit application received in one period may be responded to within the next period.

These issues mean that there are a number of permit applications, the status of which cannot be determined.

Number of Permit Applications

The following graph shows the split of permit applications received from both highway authority and utility promoters. On average, highway authorities generated 18.21% and utility promoters 81.79% of the applications received.

Chart 3 – Total Number of Works in all Categories Split Between Highway Authority and Utility promoters – See Appendix 1 for background data



6.1.2 Analysis

Permits Granted and Refused

Refusal rates are consistent across the two years of operation, and the percentage breakdown comparison of grants/refusals demonstrates parity between external promoters and the Highway Authority.

Number of Permit Applications

The number of applications has increased slightly, and this can be attributed to two factors

- Aging infrastructure in the parts of the district (reflected in the increase in minor/immediate works)
- Regeneration/growth (major and standard works)

6.2 PI2 The number of conditions applied by condition type.

This will be measured by promoter and shown as:

- the number of permits granted
- the number of conditions applied, broken down into condition types. The number of each type being shown as a percentage of the total permits issued.

6.2.1 Results

Bradford MDC is unable to supply this information at the present time due to unresolved technical issues with the Symology Insight system

6.2.2 Analysis

N/A at this time.

6.3 The number of approved revised durations

This will be measured by promoter and shown as:

- the total number of permits granted.
- the number of requests for revised durations shown as a percentage of permits issued.
- the number of agreed revised durations as a percentage of revised durations applied for.

6.3.1 Results

Table 11 – Number of Revised Durations

Organisation	Total Permits Granted	% Requests	%Requests Approved
BRADFORD	1184	2.45	89.66
BT	578	3.98	100.00
CityFibre	45	13.33	100.00
Energetics Electricity Limited	11	18.18	100.00
Northern Gas Networks	767	22.43	88.95
Northern Powergrid (Yorkshire) plc	749	19.76	89.86
Telefonica (O2 (UK) Limited)	30	3.33	100.00
T-Mobile (UK) Limited	54	1.85	100.00
VIRGIN MEDIA	499	1.00	100.00
Yorkshire Water	1586	7.19	82.46

6.4 The number of occurrences of reducing the application period

Also known as “early starts”, his will be shown as:

- the total number of permit and permit variation applications made
- the number of requests to reduce the notification period as a percentage of total applications made
- the number of agreements to reduce the notification period as a percentage of requests made.

6.4.1 Results

Table 12 – Early Starts

Year	Number of Applications	Reduction Requests %	Reductions Granted %
2015/16	5405	28.66	19.15
2016/17	5677	27.29	20.91

6.4.2 Analysis

This measure was considered to be in relation to the number of times promoters were allowed by The City of Bradford MDC to start their works without having to comply with the minimum permit application lead-in period, commonly known as an early start agreement.

The Yorkshire Common permit scheme provides a framework for The City of Bradford MDC to treat all activities and activity promoters covered by the scheme on an equal basis. The above data shows that largely to be the case. Early start requests are considered individually on their own merits by The City of Bradford MDC and are never refused without a valid reason.

The percentage reductions agreed have increased in 2016/17 in comparison with the 2015/16 year despite more permit applications being received. This is likely due to increased familiarity with the scheme by the authority and works promoters alike, and the success of the scheme affording the ability to better manage the permit network.

7 TPI measures

This section outlines the Permit Indicators (TPI) contained as Annex A within the Statutory Guidance for Highway Authority Permit Schemes .

These indicators for permit schemes are additional to the general TMA Performance Indicators (TPIs), which are already being produced.

7.1 TPI1 Works Phases Started (Base Data)

Unable to produce this report due to the limitations of the reporting systems on the EToN database (Symology Insight)

7.2 TPI2 Works Phases Completed (Base Data)

Unable to produce this report due to the limitations of the reporting systems on the EToN database (Symology Insight)

7.3 TPI3 Days of Occupancy Phases Completed

Unable to produce this report due to the limitations of the reporting systems on the EToN database (Symology Insight)

7.4 TPI4 Average Duration of Works

Unable to produce this report due to the limitations of the reporting systems on the EToN database (Symology Insight)

Details with regards to average duration of works can be found in Section 8.1 Authority Measures

7.5 TPI5 Phases Completed on time

Unable to produce this report due to the limitations of the reporting systems on the EToN database (Symology Insight)

7.6 TPI6 Number of deemed permit applications

There were 6 deemed permit applications in the 2016/17 year. 5 of these occurred through internal staff noticing errors which have now been rectified via training. The last example is a site where a permit was believed to have been refused on location grounds; however it appears the refusal was not recorded.

It is considered that this small number of deemed permits are not cause for concern.

7.7 TPI7 Number of Phase One Permanent Registrations

Unable to produce this report due to the limitations of the reporting systems on the EToN database (Symology Insight)

8 Authority Measures

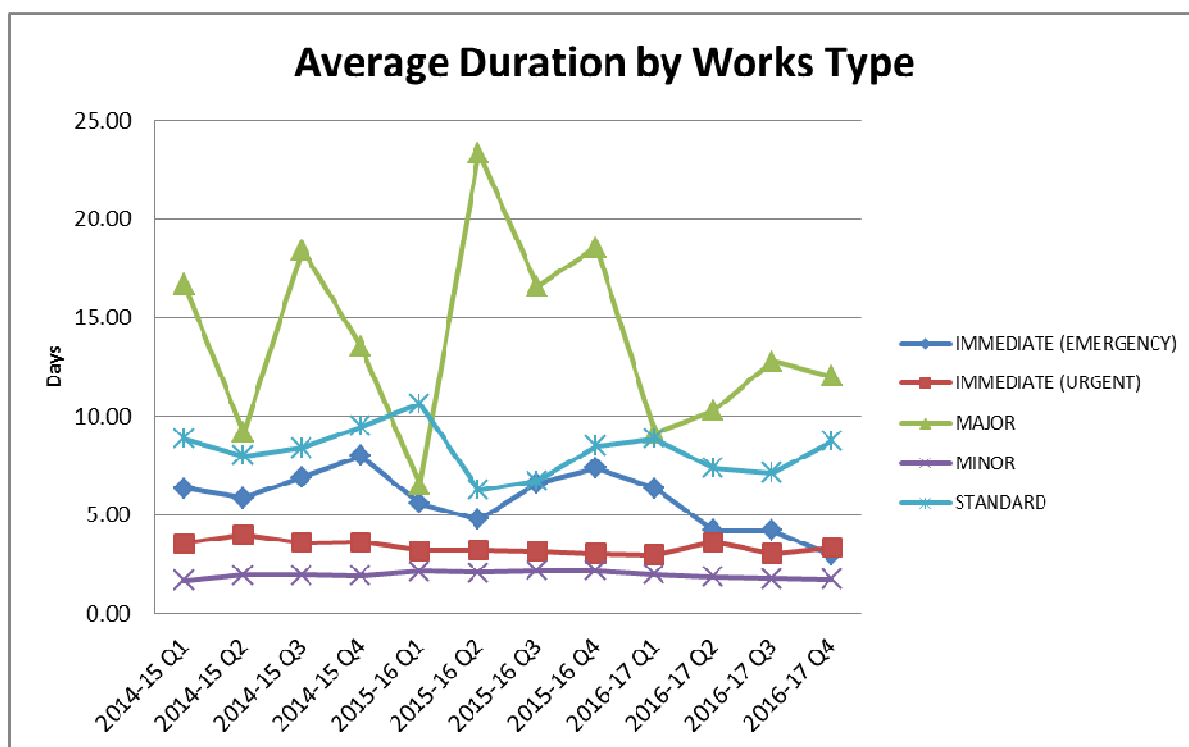
In addition to the above measures. The City of Bradford Metropolitan District Council has collated its own data.

8.1 AM 1 - Average duration of works by permit type

Table 13 - the average duration of works in days by works type from 2014/15 QTR1 until 2016/17 QTR4

Quarter	IMMEDIATE (EMERGENCY)	IMMEDIATE (URGENT)	MAJOR	MINOR	STANDARD	Combined
2014-15 Q1	6.37	3.59	16.71	1.69	8.87	7.45
2014-15 Q2	5.86	4.01	9.17	1.97	8.01	5.80
2014-15 Q3	6.92	3.61	18.46	1.98	8.40	7.87
2014-15 Q4	8.00	3.65	13.52	1.94	9.51	7.32
2015-16 Q1	5.60	3.20	6.53	2.14	10.63	5.62
2015-16 Q2	4.78	3.23	23.35	2.08	6.28	7.94
2015-16 Q3	6.61	3.18	16.60	2.19	6.73	7.06
2015-16 Q4	7.40	3.05	18.58	2.19	8.50	7.95
2016-17 Q1	6.36	2.99	9.17	2.01	8.89	5.88
2016-17 Q2	4.22	3.64	10.30	1.87	7.40	5.48
2016-17 Q3	4.23	3.05	12.82	1.78	7.15	5.81
2016-17 Q4	2.98	3.37	12.03	1.76	8.76	5.78

Chart 4- the average duration of all works in days by category from 2014/15 QTR1 until 2016/17 QTR4



AM 2 – Inspections

This measure was intended to provide two separate performance indicators:

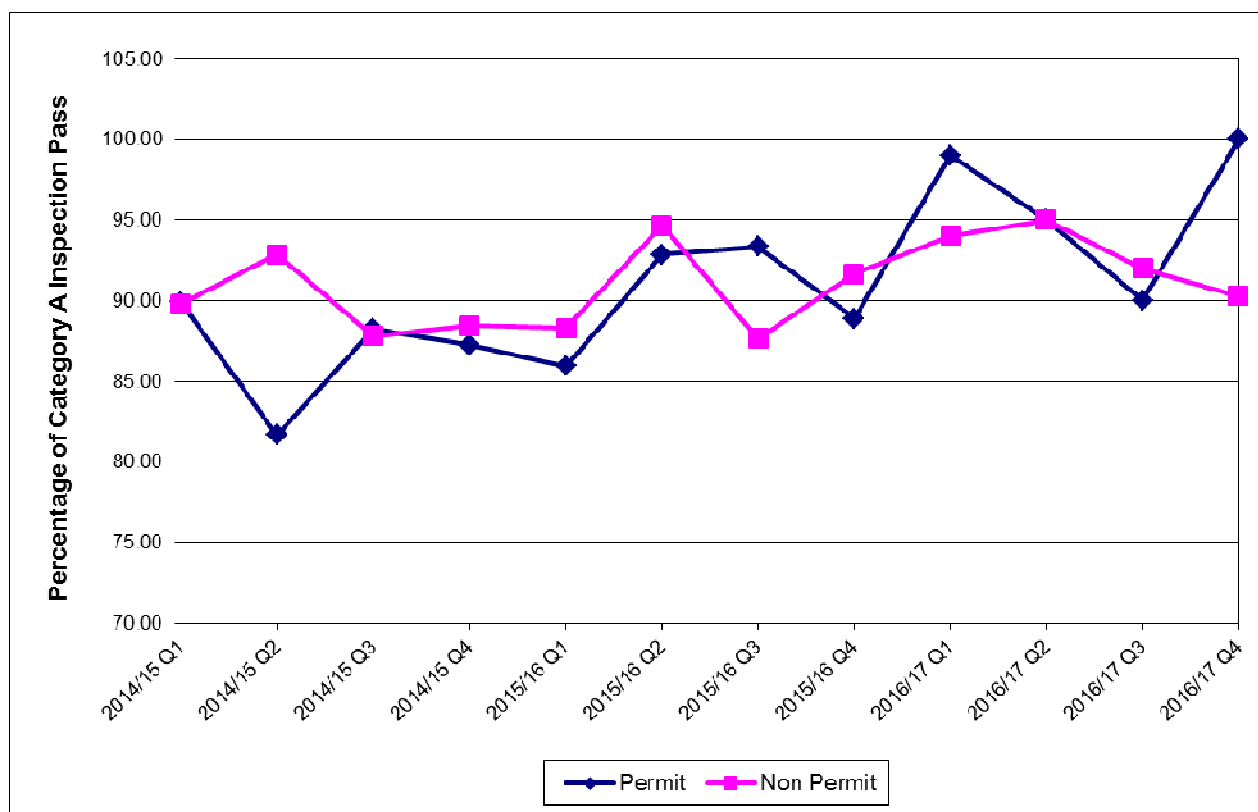
1. Number of failed Sample A inspections shown as a percentage of the total undertaken within a period.
2. Number of failed permit conditions checks (where one or more permit conditions have been breached) shown as a percentage of the total undertaken within a period.

8.2.1 Results

This data has been collated by City of Bradford MDC and a summary of the output is shown in Appendix 1.

The chart below shows a breakdown of Category A inspections completed by City of Bradford MDC, and provides a comparison with the previous year’s failure rates for the same periods.

Chart 5 – Percentage of Category A Inspection Passes - Permit and Non Permit Works



8.2.2 Analysis

Compliance on permit streets has shown a general trend of improvement across the 16/17 operational year, possibly to the detriment of works on “noticing” streets. This will be discussed with promoters at coordination and performance meetings.

Permit Condition checks are continually undertaken, however, due to technical difficulties in recording them brought about by a switch to mobile devices in 16/17, the available information across the year is insufficient to report. This will be rectified in the 17/18 operational year.

AM 3 - Days of Disruption Saved/ Number of collaborative works

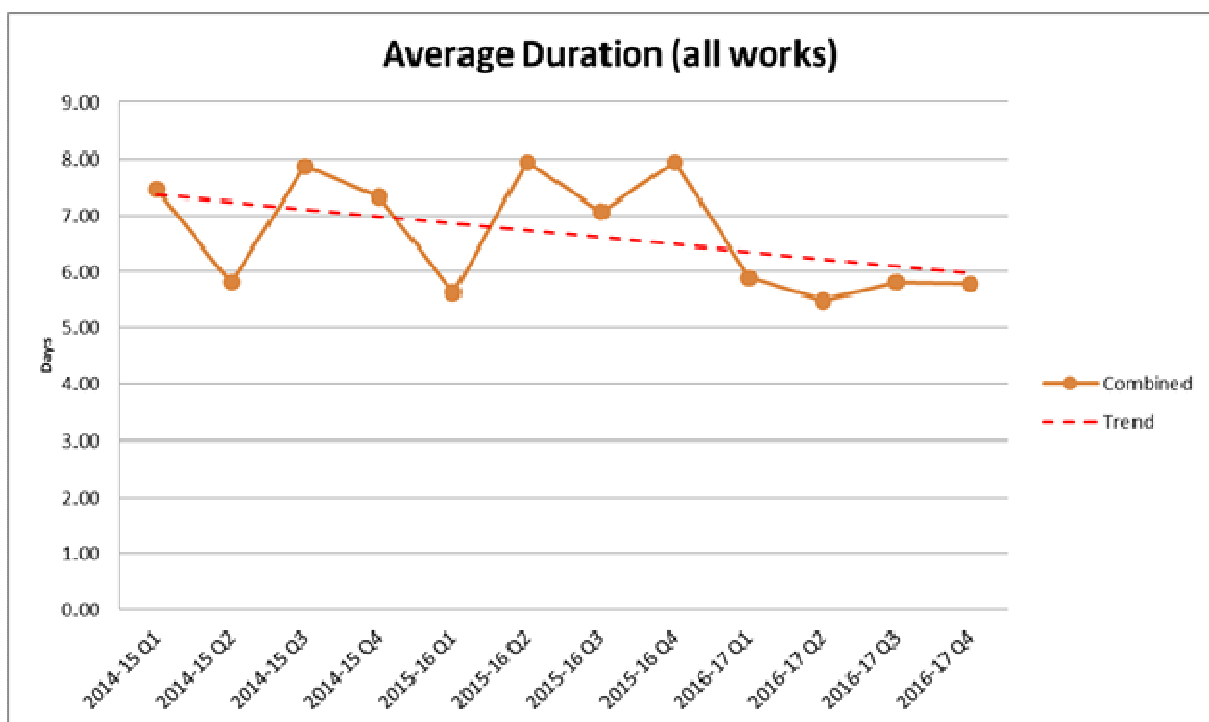
This measure is the number of days of disruption saved by an authority through the various co-ordination methodology available to them e.g. collaborative works or challenging initial duration and/or proposed methodology of working (whether formally through the S74 mechanism or through informal discussion at the planning stage).

The authority data of the number of collaborative works and the number of days saved as a result of collaborative works on the Authority road network

8.3.1 Results

The Chart below shows the average duration of all works in days from 2014/15 QTR1 until 2016/17 QTR4.

Chart 6 - Average Duration of All Works in Days



This data was collated by City of Bradford MDC utilising the EToN system and a summary of the output is shown in Appendix 1.

8.3.2 Analysis

There has been an average decrease of 1.41 days duration across all works during the 2016/17 year. This is directly attributable to an increase in challenging works durations and more effective control of works extensions within the district.

The effects of this decrease are discussed in the Cost and Benefits Section above.

Unfortunately, no collaborative working sites were recorded in 2016/17

8.4 AM 4 Response Code – broken down by promoter

This measure is the number of refusals broken down by response code where this has been used by the authority.

8.4.1 Results

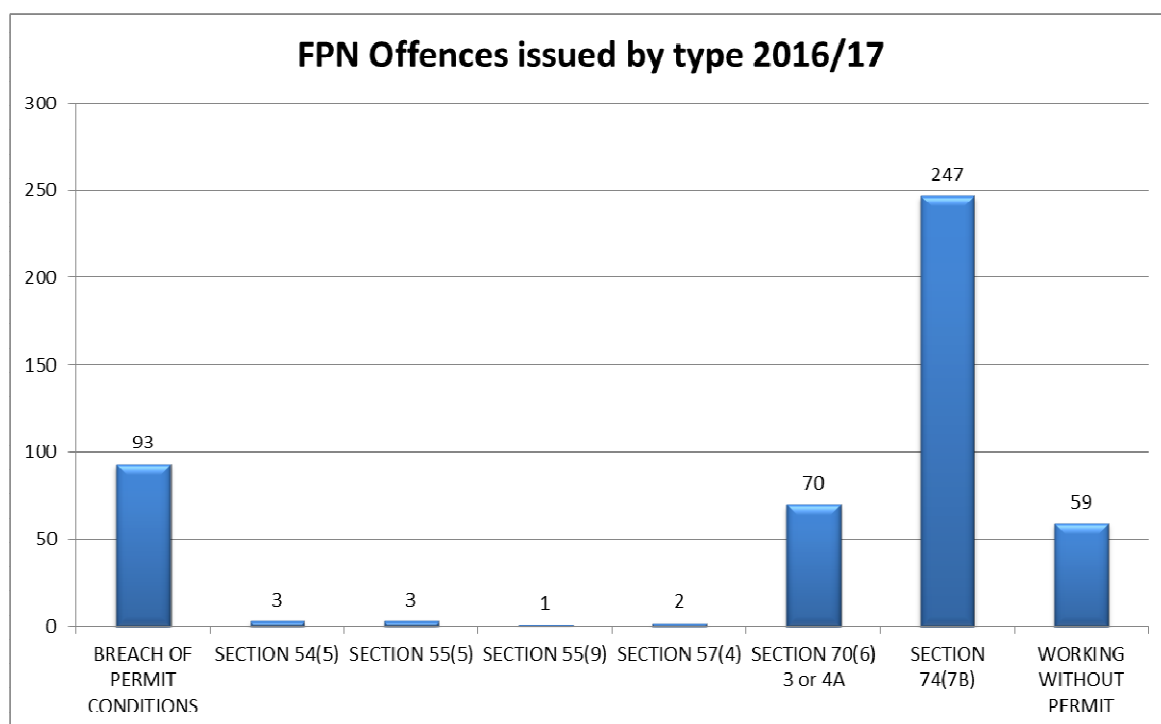
Unable to produce this report due to the limitations of the reporting systems on the EToN database (Symology Insight)

8.4.2 Analysis

N/A.

8.5 AM 5 FPNs (Permit Breaches)

Chart 7 – Fixed Penalty Notices – Offences issued by type – See Appendix 1 for background data



Bradford MDC is committed to working with promoters to improve the quality of noticing received by the Authority, to ensure that all sites are correctly represented on the Street Works Register, and to ensure compliance with the requirements of the permit scheme.

8.6 AM 6 Levels of Customer Enquiries

At the present moment in time it is not possible to report on this issue due to the limited search constraints of Bradford's Customer Service centre call logging. Better call logging solutions are currently being investigated and will be implemented during the 17/18 operational year.

9 Conclusion

The main objectives of the Scheme are to minimise delay and reduce disruption arising from works on the highway, and to demonstrate parity of treatment amongst all works promoters.

There has been an increase in the number of works carried out on the permit network, however there has been a decrease in the average duration of works, indicating that the scheme is meeting the objectives outlined at its inception.

This report demonstrates that all works promoters are engaging with the process to obtain permits, and that permit authorities have demonstrated parity of treatment for its own authority works as well as for other works promoters. The range of refusal rates indicates that there are still areas of improvement by both permit authorities and works promoters. By adopting the National Response Codes the permit authority is able to improve consistency and parity in making and dealing with permit applications and granting or refusing permits. Reasons for refusals continue to be scrutinised and both the authorities and the promoters are aware of the need to provide accurate and detailed information on the permit application and to adopt a consistent approach when dealing with refusals.

In compiling the data within this report, the limitations of the reports available to the Authority via the EToN reporting system has meant that some performance indicators cannot be reported on. It is anticipated that through support of the software developer such data can be collated in future reports.

Bradford Metropolitan District Council will continue to work with utility and highway authority promoters. The early and regular communication between permit authorities and works promoters was a key element in the successful transition to, and implementation of, the Scheme. This communication needs to continue in order to ensure the continued effective and efficient operation of the Scheme and culture change.

The Authority will continue to review performance measures to take account of improvements in data collection and data availability. It will review permit durations, particularly for emergency and immediate works where lesser durations are to be expected. Furthermore, the Authority will work to reduce the number of permit refusals and continue to utilise and raise awareness of Roadworks.org as an information (for residents, business and road users) and coordination resource (for activity promoters) and continue to utilise the National Response Codes to aid the collection of data for monitoring and reporting purposes.

The Yorkshire Common Permit Scheme continues to be represented at the National Permits Forum, in order to share and disseminate information and good practice relating to the operation of permit schemes.

Overall, the performance of the Scheme during its first and second full year of operation has demonstrated that it is meeting the objectives that were set-out. It is providing permit authorities with a valuable tool to help co-ordinate works, reduce delay and minimise disruption. It has encouraged more effective and efficient communication between permit authorities, all work promoters and highway users.

This second annual report has highlighted some areas where further development of the scheme and where improved reporting capabilities are required to evaluate and maximise the scheme benefits. Work will continue with all stakeholders to achieve these goals and continue the successes achieved in the first and second evaluation period

10 Glossary

BMDC – Bradford Metropolitan District Council.

EToN system – The Electronic Transfer of Notices, the nationally agreed format for the transmission of notice information.

EToN developers – representatives of the main software developers involved in street works

EToN Strategy Group – responsible for the development of the EToN system

NMD – Network Management Duty, a legal obligation created by the Traffic Management Act 2004 for highway authorities to secure the expeditious movement of traffic

AM – Authority Measure

PAN – Permit Advice Note

TMA – Traffic Management Act 2004

Sample A – An inspection undertaken during the progress of the works as defined in Section 2.3.1 of The Code of Practice for Inspections 2002

Appendix 1

Additional Data

Background Data for Chart 3 - Number of Permit Applications by works type

Row Labels	IMMEDIATE (EMERGENCY)	IMMEDIATE (URGENT)	MAJOR	MINOR	STANDARD	Grand Total
BRADFORD	120	13	100	228	212	673
Arqiva Ltd				1	1	2
BT	72	38	2	263	28	403
CityFibre		1		11	6	18
Dept for Transport Stat Roads				1		1
Energetics Electricity Limited			2	2	1	5
Fulcrum Pipelines Limited				4	1	5
GAS TRANSPORTATION CO LTD					6	6
National Grid Electric PLC				1		1
NETWORK RAIL -PROMOTERS NATIONAL				9	1	10
New World Payphones Ltd				3		3
Northern Gas Networks	107	9	99	59	94	368
Northern Powergrid (Yorkshire) plc	1	296	13	98	122	530
Orange PCS Group				1		1
Romec				5		5
Telefonica (O2 (UK) Limited)		1		22	1	24
T-Mobile (UK) Limited			1	40	1	42
VIRGIN MEDIA	4	36		329	6	375
Vodafone				6		6
WEST YORKSHIRE PTE	1	3		57		61
Yorkshire Water	33	424	27	599	73	1156
Grand Total	218	808	144	1511	341	3022

Background Data for Chart 7 – FPN’s – Offences issued to individual promoters, by offence type.

Promoter	BREACH OF PERMIT CONDITIONS	SECTION 54(5)	SECTION 55(5)	SECTION 55(9)	SECTION 57(4)	SECTION 70(6) 3 or 4A	SECTION 74(7B)	WORKING WITHOUT PERMIT	Grand Total
Bradford Council Permit Scheme								2	2
Bradford DSP Replacement	5	1	1			27	14	3	51
Bradford NGN Connections	4						10	1	15
Bradford Repair	9						8	1	18
Bradford Replacement	1								1
BT	8			1	1	5	30	8	53
CityFibre	5						8	1	14
Energetics Warrington						1	1		2
Fulcrum Utility Services	2						6		8
GTC - Future Utility Solutions	1						2		3
MAIN OFFICE								1	1
NATIONAL NOTICING DEPARTMENT	4					5	18	3	30
NR-LNE PM MINOR WORKS							2		2
O2 (Galliford Try)	1								1
Pennines Repair							2		2
Private Openings Under Licence		1	1				4		6
SWB ASSET CONSTRUCTION Z3	3					1	1		5
SWB MASS MARKET Z3	6					1	8		15
SWB RESTORE& RESTORATION Z3	7					2	4		13
T-Mobile (UK) Ltd - WHP Projects Ltd						1			1
Trueform Engineering Ltd	1					1	5		7
Vodafone (Ex CW - JOHN HENRY GROUP)							1		1
Vodafone (Ex CW - Kelly)						1	3		4
West Yorkshire Repair							1		1
Yorkshire Water, Amey (QB041)	1						2		3
Yorkshire Water, Amey Utility Services (5					16	55	3	79
Yorkshire Water, Approved Contractor (QB								1	1
Yorkshire Water, BBUL 5 (QB029)						2	1		3
Yorkshire Water, DrainsAid (QB012)						1	1		2
Yorkshire Water, EBU Waste Water (QB027)							14		14
Yorkshire Water, H2O (QB001)								1	1
Yorkshire Water, IETG (QB036)							3		3
Yorkshire Water, MMB 5 (QB032)							4		4
Yorkshire Water, Morrison (QB003)	26	1			1	2	15	33	78
Yorkshire Water, Morrisons 5 (QB030)	4		1			4	23	1	33
Yorkshire Water, WBU Clean Water (QB026)							1		1
Grand Total	93	3	3	1	2	70	247	59	478

