

## Equality Impact Assessment (EQIA)

<b>Name of proposal:</b>	<b>Haringey Safety Valve Programme: SEND Resource Provision's</b>
<b>Service Area:</b>	<b>SEND</b>
<b>Officer Completing Assessment:</b>	<b>Andrew Ratcliffe</b>
<b>Equalities Advisor:</b>	<b>Vlada Shevelkova</b>
<b>Cabinet meeting date:</b>	<b>6<sup>th</sup> February 2024</b>
<b>Director/Assistant Director:</b>	<b>Jackie Difolco</b>

### 2. Executive summary

The Department for Education (DfE) commenced the Safety Valve intervention programme agreed in 2021, to support the local authorities that have the highest Dedicated Schools Grant (DSG) overspends. The Safety Valve programme supports local authorities to develop and agree to substantial plans for reforming their high needs budget to fully meet SEND service requirements and place them onto a more sustainable footing. Haringey Council receives approximately £215.7m in DSG for maintained schools.

The DSG is split into 4 blocks:

Block 1 - Schools

Block 2 - High Needs

Block 3 - Early Years

Block 4 - Central School Services

Haringey Council became part of the (DfE) Safety Valve Programme from March 2022. The DSG deficit was significant at £23.83m as at 31st of March 2023. The deficit continues to increase and is unsustainable, predicted to be £78m 2027-2028.

Haringey Council has agreed a Safety Valve deal until 2027-2028, with 18 projects, across three workstreams. If successfully delivered, these projects will improve outcomes for children and young people with SEND and draw down funding of £30m to clear the projected deficit to achieve an in-year balanced budget by 2027-28. Of the 18 projects, six of these are to build education resource provision. The Haringey Children Service's Team have secured £7m of DfE capital, to develop education provision for children and young people with special educational needs and disabilities (SEND) as part of the Safety Valve Programme in addition to £5.4m of council and high needs capital funding. This paper focuses on Equality Impact Assessment requirements, which are addressed through the capital proposals for the Safety Valve programme.

The Safety Valve programme identifies three key workstreams: Demand Management (Workstream A) Commissioning (Workstream B), and Culture, Governance and Leadership (Workstream C). This EQIA focuses on the capital developments within Workstream B and delivery of education support for children with education, health, and care plans (EHCPs). The proposal is for the creation of six separate resource provisions to create 118 places in borough for children and young people, who are assigned support with their social emotional and mental health (SEMH), autism (ASC) and other complex needs. The provisions will be delivered within the Safety Valve Programme funding envelope of £12.4m.

In addition to this EQIA, which is directly related to the SEND capital resource provisions, additional EQIAs will be completed for both workstream A and C for the programme.

### 3. Consultation and engagement

In February 2023, Children services implemented an open and transparent expression of interest process, inviting applications for both primary and secondary schools across the borough to place bids for capital

investment allocated as part of the Safety Valve Programme. The capital investment is to support and run SEND resource provisions. Through March 2023, a further consultation process has taken place with stakeholder engagement which included workshops and drop-in surgeries inviting schools to engage, challenge and request further information on the project. Upon completion the application process was opened, and documents were shared, to assist in the bid writing process for those schools that wished to apply.

At the end of March 2023, the project team received several expressions of interest (EOI). A moderation panel was created, comprising of independent representatives from our local Integrated Care Board, together with parent and carer representatives from SENDPower. Colleagues from property, SEND, and representatives from schools and learning were also part of this panel. The panel assessed each application, looking at a range of measures and criteria to ensure that the appropriate schools were chosen objectively. These criteria included:

- a) school Ofsted rating being either Good or above
- b) local infrastructure and parking arrangements
- c) the school's vision to provide SEND services
- d) vision for its joint development of a SEND based curriculum with Haringey Education Partnership
- e) financial profiling and sustainability of placements
- f) staffing structure and teach to student ratio which was to be determined based on the number of children in the provision.
- g) school inclusivity.

Following assessment, the moderation panel produced recommendations of which primary and secondary site schemes were assigned for capital builds. However, this still left a gap in terms of resource provision for secondary SEMH.

### **School selection**

The following section provides a summary of the reasons and any considerations for each school selected.

Each school has been assessed against DfE BB104 technical SEND spacing guidelines, to ensure that any new resource provision can meet the needs of children with ASC and SEMH appropriately. The council is working with a range of schools across the borough, to meet a range of SEND needs, especially in areas of deprivation.

### **3a. How will consultation and/or engagement inform your assessment of the impact of the proposal on protected groups of residents, service users and/or staff? Detail how your approach will facilitate the inclusion of protected groups likely to be impacted by the decision.**

The consultation has been an ongoing process since the outset of the programme. The programme team first set-up a range of engagement forums in the form of engagement sessions with schools, spread out over set days, with the times being staggered to meet the needs of Head teachers and co-workers. There were also mop-up sessions and drop-in surgeries organised so those who were unable to attend had several opportunities to engage with the programme team.

In addition to this the programme team set-up a moderating panel to assess all the bids received for the resource provisions, this involved colleagues from the Integrated Care Board, parent and carer representatives from SENDPower. Colleagues from property, SEND, and representatives from schools and learning were also part of this panel. The panel assessed each bid, looking at a range of measures and criteria, including school inclusivity, to ensure that the appropriate schools were chosen objectively.

### **3b. Outline the key findings of your consultation / engagement activities once completed, particularly in terms of how this relates to groups that share the protected characteristics.**

As the capital builds take place for the resource provisions, sub-groups have and continue to be set-up as each of the projects begin to progress into the RIBA stages which are a plan of work which organises the process of briefing, designing, constructing and operating building projects into eight stages and explains the **stage** outcomes, core tasks and information exchanges s. Procurement tenders specified for those contractors to bid for the tenders with SEND build experience.

Further work is taking place with ICB colleagues, Whittington Health (speech and language), parent and carers' forums with the head of SEND in each of the meetings to ensure that the provisions are tailored to that needs of demographic groups and their SEND-related needs.

#### 4. Data and Impact Analysis

Note: officers may want to complement their analysis with data from the State of the Borough and ward profiles, found here: <https://www.haringey.gov.uk/local-democracy/about-council/state-of-the-borough>.

**Please consider how the proposed change will affect people with protected characteristics.**

##### 4a. Age

Jan 2023 School census				
Age	EHC	SEN Support	Not SEN	All pupils
1	0.0%	0.0%	0.1%	0.1%
2	0.1%	0.4%	0.7%	0.6%
3	0.4%	2.8%	3.7%	3.4%
4	3.3%	4.7%	6.5%	6.1%
5	7.3%	5.6%	7.6%	7.3%
6	7.3%	6.2%	7.4%	7.3%
7	8.5%	8.1%	7.3%	7.4%
8	7.1%	7.9%	7.1%	7.2%
9	8.6%	8.4%	7.3%	7.5%
10	9.1%	8.9%	7.2%	7.5%
11	10.3%	7.0%	6.9%	7.1%
12	8.4%	6.9%	7.2%	7.2%
13	8.0%	7.1%	7.1%	7.2%
14	8.5%	7.5%	7.2%	7.3%
15	6.8%	8.0%	7.0%	7.1%
16	3.2%	5.1%	4.8%	4.7%
17	1.9%	3.6%	3.6%	3.5%
18	1.1%	1.5%	1.2%	1.2%
19	0.2%	0.1%	0.0%	0.0%

#### Data

##### Borough Profile<sup>1</sup>

56,718: 0-17 (21%)

72,807: 18-34 (27%)

68,257: 35-49 (25%)

44,807: 50-64 (17%)

28,632: 65+ (11%)

##### Target Population Profile

---

<sup>1</sup> Source: State of the Borough

The new provision will impact those young people with SEND needs aged 5-19, who attend full time school in Haringey in with SEND needs, in either, early years setting, mainstream or special school or academy.

The policy will affect young people aged between 5-19 in full-time education in a Haringey maintained or academy school.

### Potential Impacts

The creation of the resource provisions will likely have a positive impact on young people aged 5-19 in education, who have an identified Special Education Need or Disability. This new programme of work will increase the number of resource provisions available which will be specifically tailored to support children Autism and Social and Emotional Mental Health. It will also ensure that children remain in borough closer to their support networks and family units.

### 4b. Disability<sup>2</sup>

#### Data

#### Borough Profile <sup>3</sup>

4,500 people have a serious physical disability in Haringey.

19,500 aged 16-64 have a physical disability this equates to approximately 10% of the population aged 16-64.

1,090 people living with a learning disability in Haringey.

4,400 people have been diagnosed with severe mental illness in Haringey.

#### Target Population Profile

Breakdown of disability within the school age population is as follows:

Primary Need SEN type	% of pupils - Jan 2023
Not SEN	82.7%
ASD	3.2%
HI	0.4%
MLD	1.7%
MSI	0.0%
NSA	0.5%
OTH	0.8%
PD	0.3%
PMLD	0.1%
SEMH	2.5%
SLCN	4.9%
SLD	0.2%
SPLD	2.5%
VI	0.1%

The data demonstrates that Haringey has a range of children with disabilities who access mainstream and SEND schools and early years settings in Haringey. For 2023-24 Haringey request for an EHCP assessment have increased by 23%. At the end of quarter two for 2023-2024, Haringey is reporting 2,843 actual active EHCP's. Extrapolating the 2,843 to the 31<sup>st</sup> of March 2024, this shows a predicted forecast figure of 2,919 EHCP's

<sup>2</sup> In the Equality Act a disability means a physical or a mental condition which has a substantial and long-term impact on your ability to do normal day to day activities.

<sup>3</sup> Source: 2011 Census

The intention of the Safety Valve Programme is to create equalities for SEND children and young people by providing a range of support descriptors designed to meet their individual needs.

### **Impact**

The proposed policy will have a positive impact on children and young peoples with ASC and SEMH needs life chances by ensuring that they have access to education and to the support required to enable them to achieve their outcomes.

## **4c. Gender Reassignment<sup>4</sup>**

### **Borough Profile**

There is no robust data at Borough level on our trans population, however the central government estimates that there are approximately 200,000 to 500,000 trans people in the UK. Assuming an average representation, this would mean between 800 and 2,000 Haringey residents are Trans.<sup>5</sup>

### **Target Population Profile**

There are a small number of transgender young people attending Haringey Schools and some of these young people have SEND. The council does not have reliable data to support a robust reporting on the target population but will address the individual needs of transgender young people via their individual assessments.

### **Impact**

The new framework allows for detailed consideration of the social, emotional, and mental health needs of children and young people with SEND. This policy will not disproportionately affect transgender young people.

## **4d. Marriage and Civil Partnership**

### **Data**

#### **Borough Profile <sup>6</sup>**

Divorced or formerly in a same-sex civil partnership which is now legally dissolved: (8.2%)

In a registered same-sex civil partnership: (0.6%)

Married: (33.3%)

Separated (but still legally married or still legally in a same-sex civil partnership): (4.0%)

Single (never married or never registered a same-sex civil partnership): (50.0%)

Widowed or surviving partner from a same-sex civil partnership: (3.9%)

### **Target Population Profile**

This policy will not affect or impact the parents of children or young people based on their marital status and we do not collect data regarding relationship status for SEND purposes.

## **4e. Pregnancy and Maternity**

### **Data**

#### **Borough Profile <sup>7</sup>**

Live Births in Haringey 2019: 3,646

---

<sup>4</sup> Under the legal definition, a transgender person has the protected characteristic of gender reassignment if they are undergoing, have undergone, or are proposing to undergo gender reassignment. To be protected from gender reassignment discrimination, an individual does not need to have undergone any specific treatment or surgery to change from one's birth sex to ones preferred gender. This is because changing ones physiological or other gender attributes is a personal process rather than a medical one.

<sup>5</sup> Trans is an umbrella term to describe people whose gender is not the same as, or does not sit comfortably with, the sex they were assigned at birth.

<sup>6</sup> Source: 2011 Census

<sup>7</sup> Births by Borough (ONS)

## Target Population Profile

This policy will not significantly affect women who are pregnant.

### Impacts

There is no reason to think that the proposed programme will impact this protected group.

#### 4f. Race

In the Equality Act 2010, race can mean ethnic or national origins, which may or may not be the same as a person's current nationality.<sup>8</sup>

#### Data

##### Borough Profile <sup>9</sup>

Arab: **0.9%**

Any other ethnic group: 3.9%

Asian: **9.5%**

Bangladeshi: 1.7%

Chinese: 1.5%

Indian: 2.3%

Pakistani: 0.8%

Other Asian: 3.2%

Black: **18.7%**

African: 9.0%

Caribbean: 7.1%

Other Black: 2.6%

Mixed: **6.5%**

White and Asian: 1.5%

White and Black African: 1.0%

White and Black Caribbean: 1.9%

Other Mixed: 2.1%

White: **60.5% in total**

English/Welsh/Scottish/Norther Irish/British: 34.7%

Irish: 2.7%

Gypsy or Irish Traveller: 0.1%

Other White: 23%

## Target Population Profile

The data demonstrates that whilst there is a small rise in children in Early Years there are falling numbers of children in London.

Data regarding children under four in Haringey

2021	2022	2023	2024	2025	2026	2027
------	------	------	------	------	------	------

<sup>8</sup> [Race discrimination | Equality and Human Rights Commission \(equalityhumanrights.com\)](https://www.equalityhumanrights.com/en/our-work/anti-discrimination-law/race-discrimination)

<sup>9</sup> Source: 2011 Census

17,845	17,907	18,007	18,095	18,176	18,250	18,318
--------	--------	--------	--------	--------	--------	--------

The current population analysis of children with SEND compared to school population is as follows:

Ethnic group (Jan 2023 school census)	EHC	SEN Support	Not SEN	All pupils
Asian - Asian British/Any Asian Background	2%	1%	2%	2%
Asian - Asian British/Bangladeshi	3%	2%	3%	2%
Asian - Asian British/Indian	1%	1%	1%	1%
Asian - Asian British/Pakistani	1%	1%	1%	1%
Black - African	19%	13%	13%	13%
Black - Black British/Caribbean	8%	7%	5%	5%
Black - Other Black	3%	3%	2%	2%
Chinese	1%	1%	1%	1%
Information Not Obtained	2%	2%	2%	2%
Mixed - Any Other Mixed Background	8%	7%	7%	7%
Mixed - White And Asian	1%	1%	2%	2%
Mixed - White And Black African	1%	2%	2%	2%
Mixed - White And Black Caribbean	4%	4%	3%	3%
Other	6%	8%	9%	8%
Refused	1%	1%	1%	1%
Travellers White - Gypsy/Roma	0%	0%	0%	0%
Travellers White - Gypsy/Roma - Other	0%	0%	0%	0%
Travellers White - Gypsy/Roma - Roma	0%	0%	0%	0%
Travellers White - Traveller of Irish Heritage	0%	0%	0%	0%
White - British	16%	22%	20%	20%
White - Irish	1%	1%	1%	1%
White - Other White	21%	24%	28%	27%

The data demonstrates that children from Black African, British, or Caribbean backgrounds are more likely to have an EHCP than other members of the school age population. A detailed piece of research and analysis is being undertaken to review the geographical and spatial socioeconomics of the borough to inform the overall impacts on these protected characteristics.

### Impacts

The proposed policy will have a positive impact on children and young people with ASC and SEMH needs including from Black African, British, or Caribbean backgrounds who are overrepresented in the SEND population by ensuring that they have access to education and to the support required to enable them to achieve their outcomes.

### 4g. Religion or belief

#### Data

### Borough Profile <sup>10</sup>

Christian: 45%  
 Buddhist: 1.1%  
 Hindu: 1.9%  
 Jewish: 3%  
 Muslim: 14.2%  
 No religion: 25.2%  
 Other religion: 0.5%  
 Religion not stated: 8.9%  
 Sikh: 0.3%

### Target Population Profile

The SEND Team do not keep data for children's religion.

### Impacts

The new resource provisions have been selected to consistently provide for SEND needs across the Borough, these new provisions will provide more parental choice and control regarding their child. The impacts will provide a new operating model where children will be in mainstream school supported by with a bespoke curriculum as and where needed. The provision also provides children with additional access to therapy rooms and sensory rooms with areas built fit for purpose locally.

The new framework allows for detailed consideration of the social, emotional, and mental health needs of children and young people with SEND. It is anticipated that the provisions will not disproportionately affect children of different religions.

## 4h. Sex

### Data

Sex	EHC	SEN Support	Not SEN	Grand Total
F	29.2%	37.3%	51.6%	48.7%
M	70.8%	62.7%	48.4%	51.3%

### Borough profile <sup>11</sup>

Females: (50.5%)  
 Males: (49.5%)

### Target Population Profile

The profile of children with SEND demonstrates that boys are over-represented in the SEND system.

Gender	EHC	SEN Support	Not SEN	Grand Total
Female	29.2%	37.3%	51.6%	48.7%
Male	70.8%	62.7%	48.4%	51.3%

<sup>10</sup> Source: 2011 Census

<sup>11</sup> Source: 2011 Census



Further analysis of data in relation to SEND demonstrates that this over-representation of boys in SEND systems is widespread nationally and requires further analysis and attention.

## Impacts

The commissioning capital build element of the projects will ensure that the fair, open and transparent consideration of children and young people's SEND needs, and the allocation of resources are being met and are regularly reviewed. The proposal is likely to have a positive impact on boys with SEND.

### 4i. Sexual Orientation

#### Data

##### Borough profile <sup>12</sup>

3.2% of London residents aged 16 or over identified themselves as lesbian, gay or bisexual in 2013. In Haringey this equates to 6,491 residents.

#### Target Population Profile

The sexual orientation of young people with SEND is not recorded.

## Impacts

The provision made within the policies will ensure that all young people are supported to attend and access education. The new framework allows for detailed consideration of the social, emotional, and mental health needs of children and young people with SEND. It is anticipated that the provisions will not disproportionately affect children of different sexual orientations.

### 4j. Socioeconomic Status (local)

#### Data

##### Income

8.3% of the population in Haringey were claiming unemployment benefit on 9 December 2021.<sup>13</sup>

20.8% of the population in Haringey were claiming Universal Credit on 9 December 2021.<sup>14</sup>

29% of employee jobs in the borough are paid less than the London Living Wage.<sup>15</sup>

##### Educational Attainment

While Haringey's proportion of students attaining grade 5 or above in English and Mathematics GCSEs is higher than the national average, it is below the London average.<sup>16</sup>

4.4% of Haringey's working age populations had no qualifications in 2020.<sup>17</sup> 4.8% were qualified to level one only.<sup>18</sup>

## Area Deprivation

Haringey is the 4th most deprived in London as measured by the IMD score 2019. The most deprived LSOAs (Lower Super Output Areas or small neighbourhood areas) are more heavily concentrated in the east of the borough where more than half of the LSOAs fall into the 20% most deprived in the country.

---

<sup>12</sup> Source: ONS Integrated Household Survey

<sup>13</sup> [ONS Claimant Count](#)

<sup>14</sup> [LG Inform](#)

<sup>15</sup> ONS

<sup>16</sup> Source: Annual Population Survey 2019 (via nomis)

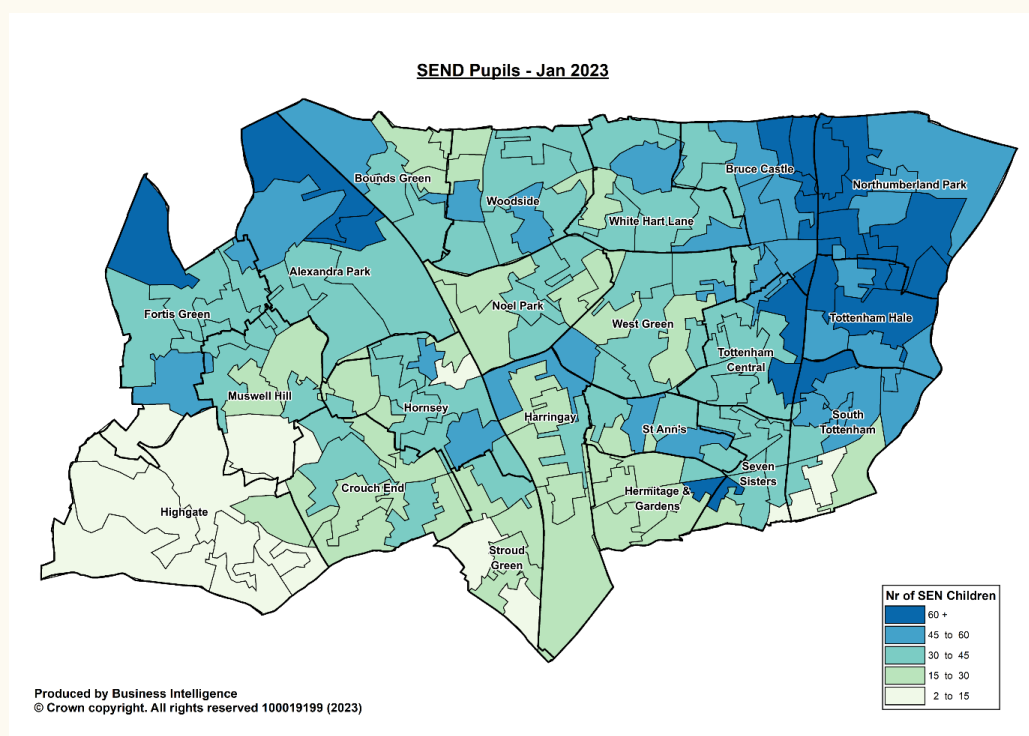
<sup>17</sup> [LG Inform - qualifications](#)

<sup>18</sup> [LG Inform – level one](#)

## Target Population Profile

### Number of children living in the 40% most deprived areas (Indices of Multiple Deprivation 2019)

Ward	0 yrs	1 yrs	2 yrs	Total
Bounds Green	88	118	101	307
Bruce Grove	194	186	176	556
Fortis Green	40	50	36	126
Harringay	97	85	88	270
Hornsey	185	169	178	532
Noel Park	173	166	176	515
Northumberland Park	270	281	288	<b>839</b>
Seven Sisters	288	306	313	<b>907</b>
St Ann's	178	192	155	525
Stroud Green	61	56	64	181
Tottenham Green	207	251	203	661
Tottenham Hale	237	252	244	<b>733</b>
West Green	164	149	150	463
White Hart Lane	157	174	175	506
Woodside	231	217	191	639
<b>Grand Total</b>	<b>2570</b>	<b>2652</b>	<b>2538</b>	<b>7760</b>



These data show that whilst there are high proportions of children with SEND in areas of high deprivation, there are also high numbers of children with SEND in the more affluent areas of the Borough too.

Locations of schools were considered during the bidding process to ensure that there is an adequate supply of provisions in all areas – including those with higher deprivation.

The geographic gradient of deprivation was also taken into consideration when deciding where resource provisions would be placed. There is also a benefit realisation that these provisions will have an impact not only on the child placed in the provisions but will have wider community benefits through the education support the pupil will ascertain.

These revised policies apply to all school-aged children educated in Haringey, in maintained and academy schools, and early years settings, and are designed to promote fair, open, and transparent allocation of resources from the high needs block for all children with SEND. Haringey children and young people with SEND achieve better academic outcomes than children and young people with SEND in other local authorities, according to national data (see Haringey Matrix)

## **Impacts**

Provision of fair, open, and transparent resourcing, based on the needs of children and young people allows children and young people to be supported according to their needs which will promote education outcomes for children and young people in the Borough, including children in the East of the Borough where deprivation levels are higher.

### **Key Impacts Summary**

#### **5a. Outline the key findings of your data analysis.**

The data regarding the users of the current SEND bandings and top-ups system (children with EHCPs) indicates that they are representative of the population of children and young people with SEND in Haringey.

The data show that boys and those from Black African, British, or Caribbean backgrounds are overrepresented in the SEND population. Additionally, there are high proportions of children with SEND in areas of high deprivation.

#### **b. Intersectionality**

Consideration of intersectionality demonstrates the disproportionate number of boys with SEND, and the data regarding home school indicates over-representation from Black Caribbean and Black African boys within the SEND service. It is therefore possible to argue that the service continues to support this cohort of young people and that improved data collection will support the evidence of impact.

Furthermore, there appears to be a spread of children with EHCPs across the borough but most particularly in areas of the Borough most associated with high levels of socio-economic deprivation.

#### **5c. Data Gaps**

There are significant data gaps regarding users of home-school SEND services which will be addressed via better monitoring and management via the new Liquid Logic software, including recording of religious faith and transgender identities.

#### **6. Overall impact of the policy for the Public Sector Equality Duty**

The proposal will increase equality of accessibility to education via provision for children and young people with SEND needs, these will be subject to locally based governance arrangements which ensure that parents and schools and the NHS work together with the Local Authority ensuring that administrative practice is fair, open and transparent and subject to regular scrutiny and evaluation.

#### **7. Amendments and mitigations**

##### **7a. What changes, if any, do you plan to make to your proposal because of the Equality Impact Assessment?**

**No major change to the proposal:** the EQIA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality are undertaken.

##### **7. Ongoing monitoring**

Service to create improved data monitoring systems to record access to service by children from different backgrounds, and a range of disabilities.

## **8. Authorisation**

EQIA approved by (Assistant Director/) Jackie Difolco.

Date 14 December 2023

## **9. Publication**

Please ensure the completed EQIA is published in accordance with the Council's policy.

Please contact the Policy & Strategy Team for any feedback on the EQIA process.