


Section 1: Introduction

Name of proposal
For the purpose of this document, 'proposal' refers to a policy, function, strategy or project
Special Educational Needs, Disabilities and Inclusion Strategy 2024 – 29
Service area and Directorate responsible
SEND service, Children's Services Directorate
Name of completing officer
Rebecca Williams
Approved by (Corporate Director / Divisional Director/ Head of Service)
Tina Sode
Date of approval
08/07/2024

Conclusion	Current decision rating (see Appendix A)
<p>Successful implementation of the strategy will have a positive impact – helping to reduce inequalities (particularly those based on disability) and improve cohesion and inclusion.</p> <p>The EqIA identifies possible barriers to identification of SEND and access to services for girls and minoritised communities (ethnic and low-income). The priorities within the strategy lay out a comprehensive vision for how partners will work together to improve identification of SEND, access to services, and information about services. A key theme in this strategy is listening to the voices of and co-production with children, young people and parents. This will help ensure that services meet the needs of children and young people throughout the community.</p>	

The Equality Act 2010 places a ‘General Duty’ on all public bodies to have ‘due regard’ to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between those with ‘protected characteristics’ and those without them
- Foster good relations between those with ‘protected characteristics’ and those without them

This Equality Impact Analysis provides evidence for meeting the Council’s commitment to equality and the responsibilities outlined above. For more information about the Council’s commitment to equality, please visit the council’s [website](#).

Section 2: General information about the proposal

Describe the proposal including the relevance of proposal to the general equality duties and protected characteristics under the Equality Act 2010

The SEND and Inclusion Strategy is a partnership strategy for 2024 – 29, led by the SEND Improvement Board.

The strategy sets out the partnership plans to improve support for children and young people with SEND and their families, and how it will work to improve inclusion for children and young people with SEND in activities and opportunities in the borough and support them to thrive.

There are three areas where the strategy has the potential to advance equality:

1. Advancing equality of opportunity for disabled children and young people

As a significant proportion of children and young people with Special Educational Needs and Disabilities will meet the definition of disabled under the Equality Act, the objectives of the strategy are relevant to the general equality duties. The strategy aims to advance equality of opportunity for children and young people with SEND and foster good relations between them and their peers.

2. Identifying and reducing inequalities in the identification of children and young people with different SEND needs.

Boys are generally more likely than girls to be identified as having SEND, and the ethnic background of children with different SEND needs can differ from that of the child population of Tower Hamlets as a whole. The strategy and following Joint Strategic Needs Assessment offer an opportunity to understand whether children with some protected characteristics are less likely to have their needs identified.

3. Identifying any barriers to effective support and positive outcomes for children and young people with SEND

The strategy offers an opportunity to understand how effective SEND support is in improving outcomes for children with different backgrounds and to address barriers to effective support.

Section 3: Evidence (consideration of data and information)

What evidence do we have which may help us think about the impacts or likely impacts on residents, service users and wider community?

Borough evidence:

- [Special educational needs in England: January 2024](#)
- [Education, health and care plans: England 2024](#)
- [Tower Hamlets Borough Equality Assessment 2024-2026](#)
- [Tower Hamlets Borough Profile 2024](#)
- ASD in Somali Children Research Project Report
- SEND and Inclusion Strategy public consultation (2024)
- [Census 2021](#)

National evidence:

- [Special educational needs and their links to poverty \(2016\)](#)

The Special educational needs in England data and Educational, health and care plans (EHCP) data provides quality evidence of SEND in Tower Hamlets across age, gender, ethnicity, and type of needs. The data allows us to benchmark Tower Hamlets against national trends. Note, the Special educational needs in England data is based on data collected in the Tower Hamlets School Census and includes children who are educated in Tower Hamlets but live outside of the borough. It captures pupils on SEN Support and EHCPs. The EHCP data only includes children and young people aged 0 – 25 years with an EHCP maintained by Tower Hamlets.

This Equality Impact Analysis (EqIA) considers a range of other data. It uses qualitative evidence from the SEND and Inclusion Strategy public consultation, including a public survey and series of engagement events. The experiences and views of a wide range of parents, community organisations and professionals have therefore been considered. The EqIA also considers findings within the ASD in Somali Children Research Project Report, based on consultation with Somali parents in Tower Hamlets.

Section 4: Assessing the impacts on different groups and service delivery

Groups	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups?									
Protected													
Age (All age groups)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p><i>The strategy applies to children and young people aged 0 – 25 years, reflecting the Children and Families Act 2014.</i></p> <p>The strategy addresses the needs of different age groups of children with SEND. The majority of our EHCP cohort are aged between 5 and 19. 29.2% of our EHCP cohort are aged between 11-15, which is below the national average of 36.4%. 12.4% are aged 20-25 which is twice the national figure.</p> <p>Three priorities within the strategy specifically address the needs of different age groups: focus on different age groups: under-fives, school-age children, and young adults with SEND. This strategy recognises the different needs of each age groups and tailors support and pathways to meet these needs.</p>									
Disability (Physical, learning difficulties, mental health and medical conditions)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p><i>By improving the timeliness and effectiveness of support for children and young people with SEND, and supporting inclusion in local communities and activities, the strategy will support equality for young residents with SEND and neurodiversity.</i></p> <p>Tower Hamlets has 4,463 children with an EHCP (June 2024). The percentage of our school population with an EHCP is 6.8%, the highest in England. The national average is 4.8%. Pupils requiring SEN Support sits at 12.4%, below the national average of 13.6%.</p> <table border="1"> <thead> <tr> <th>Primary type of need</th> <th>Number of pupils with an EHCP</th> <th>% pupils on EHCP</th> </tr> </thead> <tbody> <tr> <td>Speech, Language and Communications needs</td> <td>1550</td> <td>34.7%</td> </tr> <tr> <td>Autistic Spectrum Disorder</td> <td>1172</td> <td>26.3%</td> </tr> </tbody> </table>	Primary type of need	Number of pupils with an EHCP	% pupils on EHCP	Speech, Language and Communications needs	1550	34.7%	Autistic Spectrum Disorder	1172	26.3%
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Social, Emotional and Mental Health	504	11.3%
Moderate Learning Difficulty	447	10.0%
Hearing Impairment	153	3.4%
Profound & Multiple Learning Difficulty	143	3.2%
Physical Disability	140	3.1%
Severe Learning Difficulty	90	2.0%
Specific Learning Difficulty	73	1.6%
Visual Impairment	47	1.1%
Other Difficulty/Disability	41	0.9%
Multi- Sensory Impairment	20	0.4%

(Education, health and care plans: England 2024)

For our EHCP cohort the most prevalent primary need groups are Speech, Language and Communication Needs (SLCN) and Autism. These areas of need account for almost two-thirds of EHCPs in the Local Area. Providing specific support for Autism and SCLN are priorities within the strategy, including early identification and diagnosis, implementing a speech and language therapy programme for 2 – 5 year olds, and the development of pathways for parents to support children will social and communication needs.

Whilst SCLN and Autism make up for almost two-thirds of EHCPs in Tower Hamlets, the strategy aims to meet the wide range of needs of our children and young people with SEND. For example, we recognise that children with physical disabilities and sensory impairment might represent a small number of EHCPs, but that these conditions may have lifelong impacts and have significant resource need. The strategy makes a specific commitment to deliver more support and placements for children with more complex needs, and for Tower Hamlets to be a ‘neurodiversity friendly’ borough.

Furthermore, at the time of writing the strategy, the SEND Joint Strategic Needs Assessment (JSNA) is underway. The JSNA will further explore support for ADHD.

Sex	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p><i>Boys and girls have different rates of SEND. Further analysis is required to understand gender inequalities in the identification of SEND.</i></p> <p>Boys are much more likely to be identified as having SEND than girls. Of those aged 0 - 25 on EHCPs, 72% are male and 28% are female. This is in line with the national trend. Of children and young</p>
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				<p>people with SEND (EHCPs and SEN support), 65% are male and 35% are female. This is in line with the national trend.</p> <p>Males are particularly overrepresented in EHCPs for Autism as the primary category of need. Of those with Autism as a primary need, 82% are male and 18% are female. The overrepresentation of males with Autism is even more pronounced in Tower Hamlets than nationally. Nationally, of those with Autism as a primary need, 77.9% are male and 22.1% are female. Underdiagnosis of Autism in girls has been widely documented as the expressions of symptoms may differ to boys and girls may be socialised to mask their challenges more so than boys.</p> <p>The underdiagnosis of Autism in girls is even more significant for certain ethnic groups. For example, 16.9% of Bangladeshi pupils with EHCPs for Autism are girls, and 11.1% of 'Any other black background' pupils are girls.</p> <p>The JSNA will examine potential inequalities linked to gender and ethnicity in the identification of SEND. The strategy commits to using the JSNA to understand and address inequalities in identification and support.</p>						
Gender reassignment	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>Insufficient information to draw conclusions. However, the strategy has a strong focus on building the voice and wishes of children and young person into all plans and support.</p>						
Marriage and civil partnership	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>Discrimination based on marriage and civil partnership status not relevant to this strategy.</p>						
Religion or philosophical belief	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p><i>The strategy's focus on inclusion and co-production will support the partnership to meet the needs of children and young people with SEND in a culturally inclusive way</i></p> <p>Information about religion or belief is not captured within the SEND data. Census data shows that the majority of 0 – 24 year olds in Tower Hamlets are Muslim:</p> <table border="1"> <thead> <tr> <th>Religion (10 categories)</th> <th>Number</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>Muslim</td> <td>57696</td> <td>57.5%</td> </tr> </tbody> </table>	Religion (10 categories)	Number	Percentage	Muslim	57696	57.5%
Religion (10 categories)	Number	Percentage								
Muslim	57696	57.5%								

No religion	18050	18.0%
Christian	15463	15.4%
Not answered	6575	6.6%
Hindu	1354	1.3%
Buddhist	428	0.4%
Other religion	324	0.3%
Sikh	245	0.2%
Jewish	224	0.2%
Does not apply	0	0.0%

(2021 ONS Census)

Throughout the SEND Strategy consultation parents raised the importance of environments that are not only inclusive for children and young people with SEND, but are also inclusive of different faiths and cultures. For example, Muslim mothers highlighted the challenges of not being able to attend mixed swimming lessons with their children with SEND.

The strategy has a clear focus on inclusion and supports links between the SEND service, Public Health and the insourced leisure service. The strategy commits to co-production and to improve inclusivity as part of bringing leisure services under council management which will ensure the needs of the community are met.

Race

Different ethnic groups receive different rates of support for SEND and varying prevalence of different needs. The strategy's focus on understanding the needs of individual children and communities, and co-production of services, will ensure that the strategy addresses a wide range of needs.

Ethnicity	All pupils	EHCP	SEN Support	No SEN
Asian (%)	66.2	62.9	56.6	67.9
Black (%)	9.4	9.2	9.2	9.1
Mixed (%)	8.1	8.1	11.3	7.5
Other (%)	3	2.1	3	3.1
Unknown (%)	0.8	1	0.7	0.8

White (%)	12.5	14.1	19.1	11.5
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(Special educational needs in England: January 2024)

White British children are overrepresented in both the EHCP and SEN support cohorts. Whilst White British children make up 7.7% of all pupils in Tower Hamlets schools, they make up 10.7% of students on EHCPs and 14.3% students on SEN Support. Mixed children are overrepresented in SEN support cohorts, making up 8.1% of all pupils and 11.3% SEN support. The JSNA will further explore the overrepresentation of White British children with SEND.

Of our EHCP cohort, Somali pupils are overrepresented in receiving EHCPs for ASD. 33% of Somali pupils on an EHCP have ASD as their primary need, whereas 25% of all pupils on an EHCP have ASD as their primary need. The ASD in Somali Children Research Project has highlighted that Somali parents felt racism meant that their child's needs were being dismissed as behavioural issues.

Bangladeshi pupils are underrepresented in SEN support for ASD, representing 62.4% of the pupil population, and representing 48.7% of pupils receiving SEN support for ASD.

Consultation with parents, including Somali and Bangladeshi parents, highlighted specific barriers to accessing services including understanding of terminology, access to services, understanding within the community, and access to culturally sensitive pathways. The strategy's focus on user-friendly services and early identification will support all children and young people with SEND and their parents to access services. The strategy's focus on co-production and engagement will ensure that the delivery of the strategy is informed by the needs of the community.

Sexual orientation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Insufficient information to draw conclusions. However, the strategy has a strong focus on building the voice and wishes of children and young person into all plans and support.
Pregnancy and maternity	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Discrimination based on pregnancy and maternity not relevant to this strategy.
People with Care Experience	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Strategy includes commitments to strengthen joint working between social care and SEND services and to strengthen transition pathways for young people with EHCPs who will transition from Children's Social Care to Adult Social Care, which will enhance and coordinate support for children and young people who we look after or are care experienced.

Other																			
Socio-economic	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p><i>Using free school meals as an indicator, children with SEND are more likely to be from low-income families. The strategy prioritises early identification and user-friendly services which national research has recommended to improve access for children from low-income families to SEND support.</i></p> <p>Children and young people with SEND who attend Tower Hamlets schools are more likely to be eligible for free school meals. 53.2% of children with an EHCP are eligible for free school meals compared with 37.5% of children who do not have SEN support.</p> <table border="1" data-bbox="808 536 1809 703"> <thead> <tr> <th>Eligibility for free school meals</th> <th>Total</th> <th>EHC plans</th> <th>SEN Support</th> <th>No SEN</th> </tr> </thead> <tbody> <tr> <td>Eligible for free school meals (%)</td> <td>40.1</td> <td>53.2</td> <td>49.2</td> <td>37.5</td> </tr> <tr> <td>Not eligible for free school meals (%)</td> <td>59.9</td> <td>46.8</td> <td>50.8</td> <td>62.5</td> </tr> </tbody> </table> <p><i>(Special educational needs in England: January 2024)</i></p> <p>Research has documented the link between SEND and poverty, including the outcomes children gain as part of their education, their wellbeing as children, their access to support for their needs, and their chances of finding well-paid work as an adult. This research also highlights that pupils from low-income families are more likely to be identified as having SEND, but at the same time are less likely to receive support or effective interventions that might help to address their needs.</p> <p>Whilst the strategy aims to improve the outcomes of all children and young people with SEND, the focus on user-friendly services, early intervention and transitions supports research recommendations for improving access to SEND support for children from low-income families.</p>	Eligibility for free school meals	Total	EHC plans	SEN Support	No SEN	Eligible for free school meals (%)	40.1	53.2	49.2	37.5	Not eligible for free school meals (%)	59.9	46.8	50.8	62.5
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Parents/Carers	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p><i>The strategy has a focus on support for and continued engagement with parents.</i></p> <p>The strategy takes into account the views of parents of children and young people with SEND. In the public consultation, parents expressed that they would like more access to training and resources to better support their children, more accessible play and leisure facilities, and access to support such as Let's Talk SEND events. The strategy has a clear focus on user-friendly services, inclusion, empowering parents to support their children, support for parents, and ongoing co-production and engagement with parents.</p>															

People with different Gender Identities e.g. Gender fluid, Non-Binary etc	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Insufficient information to draw conclusions. However, strong focus on building the voice and wishes of children and young person into all plans and support.</p> <p>The JSNA might explore barriers that children and young people with SEND may face in understanding their gender and sexual identity, accessing support to understand their identity, and sexual health services.</p>
Any other groups	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

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Section 5: Impact analysis and action plan

Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Update on progress
Do further analysis of the over and underrepresentation of girls and minoritised communities in SEND cohorts	Complete a SEND Joint Strategic Needs Assessment and agree recommendations.	September 2024	Phoebe Kalungi	
Ensure engagement and co-production of services with young people and parents is representative of the community	Monitor equalities information for engagement and co-production activities.	Annually	Tina Sode	
Improve minoritised communities' access to services	Implement agreed recommendations from ASD in Somali Children Project.	Annually	Tina Sode	
Improve minoritised communities' access to services	Reflect parent feedback from the SEND Strategy public consultation in the delivery plans.	October 2024	Tina Sode	

Section 6: Monitoring




What monitoring processes have been put in place to check the delivery of the above action plan and impact on equality groups?

The action plan will be delivered through the strategy's annual delivery plan to ensure that equalities actions are embedded in strategy delivery.

The delivery plan will be monitored and reviewed on an annual basis.

Appendix A

EIA decision rating

Decision	Action	Risk
<p>As a result of performing the EIA, it is evident that a disproportionately negative impact (direct, indirect, unintentional or otherwise) exists to one or more of the nine groups of people who share a Protected Characteristic under the Equality Act and appropriate mitigations cannot be put in place to mitigate against negative impact. It is recommended that this proposal be suspended until further work is undertaken.</p>	<p>Suspend – Further Work Required</p>	<p>Red</p> 
<p>As a result of performing the EIA, it is evident that there is a risk that a disproportionately negative impact (direct, indirect, unintentional or otherwise) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, there is a genuine determining reason that could legitimise or justify the use of this policy.</p>	<p>Further (specialist) advice should be taken</p>	<p>Red Amber</p> 
<p>As a result of performing the EIA, it is evident that there is a risk that a disproportionately negatively impact (as described above) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, this risk may be removed or reduced by implementing the actions detailed within the <i>Impact analysis and action plan</i> section of this document.</p>	<p>Proceed pending agreement of mitigating action</p>	<p>Amber</p> 
<p>As a result of performing this analysis, the policy or activity does not appear to have any adverse effects on people who share <i>Protected Characteristics</i> and no further actions are recommended at this stage.</p>	<p>Proceed</p>	<p>Green</p> 