

# **Tower Hamlets LA SEND Sufficiency Review**

**November 2023**

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## Executive Summary:

Tower Hamlets is proud of being an inclusive Local Area where pupils achieve good outcomes, and this Sufficiency review is a part of our commitment to delivering high quality provision and placements which meets their needs. This review reflects our desire for needs-led support, with timely identification ensuring that our children and young people can access the right support at the right time. Our SEND Sufficiency Review is a key document for the Local Authority and will lead into a review of our overall SEND Strategy in 2024.

Mastodon C were commissioned to analyse trends and pupil level data for EHCPs and specialist placement numbers across Tower Hamlets. This report provides a detailed analysis of EHCP numbers, need, and pupil profile in the Borough, with a review of current provision on specialist placement and provision. This report has taken into consideration the last three years of SEN2 data, as well as pupil projections from the Greater London Authority.

The report indicates that there is likely to be significant growth in the number of EHCPs to the end of the decade despite declining birth numbers. The three main areas of need being Speech, Language and Communication, Autism, and Social, Emotional and Mental Health; there is significant unmet need in the areas of SLD/PMLD as well. There is a correlation between the increase in demand for specialist provision and placements, and available capacity at our current specialist provisions.

Projections indicate a shortfall of up to 260 places in specialist placements across all needs within the next 10 years; more immediately, it faces a shortfall up to the 2026/27 academic year of between up to 125 places. This is comprised of a shortfall of 75 ASD and Communication/Interactions specialist placements; 25 SEMH placements; and 25 SLD (cognition and learning) placements. There is a near even distribution of need between primary and secondary stages. Currently this demand is being accommodated by mainstream schools or through the Independent and Non-Maintained Sector. Unfortunately, mainstream schools may only partially meet the needs of the pupil, whilst the private sector is at significant cost to the public purse.

This report is proposing immediate action is taken to address this shortfall head on, to ensure that pupils with the most complex of needs can access the placements and support which they require, at a time they require. This report proposes that a pilot programme of specialist Additionally Resourced Provisions, catering to a high level of need in the areas of Autism and Communication and Interaction; SEMH; and SLD; is begun, with an intention they be operationally available to pupils in the 204/25 academic year. Further, an expansion of current specialist provision will need to be considered in the latter half of the decade.

## Legislative Context:

Local Authorities are legally obligated under Section 14 of the Education Act 1996 to ensure the availability of a sufficient number of school places to adequately meet the educational requirements of all children and young individuals residing within their area, or for whom they hold responsibilities. This responsibility encompasses a particular consideration for the provision of educational opportunities for children and young individuals with Special Educational Needs and Disabilities (SEND).

It is important to emphasize that these responsibilities are further reinforced and expanded upon by the provisions outlined in both the Equality Act 2010 and the Children and Families Act 2014.

Key to our ability to meet the needs of all children and young people with SEND is ensuring that we provide and plan for future provision that will meet our local needs. Demand and resourcing pressures mean that the existing approach to specialist Special Educational Needs (SEN) educational placements is not financially sustainable in the long term. The key challenge for the Local Authority (LA) and stakeholders will be maintaining the positive outcomes for pupils whilst reviewing the funding levels to meet demand within the available budget. The six key areas of consideration are:

1. Build upon the already successful model of inclusion by expanding and developing the capacity of mainstream schools to meet the needs of more complex learners,
2. Create the necessary capacity in the system at already high quality, well-established and 'outstanding' specialist provision. Ensuring the LA can meet current and future demand and enabling SEND children to attend the most suitable local school,
3. Reduce the reliance on out of borough special school places and schools in the independent sector, through an increase in local resource provision in mainstream, particularly for children with ASD and SEMH,
4. Redesign the specialist system for children and young people with SEMH to ensure integration pathways for those learners who can be supported back into mainstream settings and ensure high quality learning and support for those whose needs require ongoing specialist support,
5. Extend the offer and range of Post 16 provision, to enable more young people with SEND to achieve Preparation for Adulthood outcomes: employment; independent living; health and community participation,
6. Promote independence by providing independent travel training and personal travel budgets for eligible children and young people and their families.

## Sufficiency Assessment Process:

Mastodon C assessed SEN sufficiency across the borough using a range of data sources to identify the current demands within the SEN sector and to project how these trends may impact future demand on SEN capacity. These included:

- DfE SEN statistics 2021-23,
- SEN2 data 2021-23,
- School census data 2021-23,
- GLA projection data 2023,
- Pupil level information from special schools and resource bases on pupil numbers, 2021-23.

The projections concerning the demand for specialist provision were derived through the utilization of Mastodon C's SEND model, accessible at <https://www.mastodonc.com/products/send-model>. This model commences by incorporating data from the current resident Special Educational Needs (SEN) population, as comprehensively documented in the SEN2 and school census returns. Subsequently, it employs an Empirical Bayes probabilistic Markov model to simulate potential future scenarios on an annual basis, spanning a period of up to 10 years.

The simulation encompasses a comprehensive analysis of various categories, including leavers, stayers, movers, and joiners. These categories are delineated based on National Curriculum Year (NCY), EHCP primary need, and educational setting. The model employs rates that are meticulously grounded in recent historical data, ensuring a robust and reliable projection of demand for specialist provision.

## Tower Hamlets Local Sufficiency Context:

### Tower Hamlets Current Demand:

**Fig. 1: Breakdown of SEN within the School Population 2022/23**

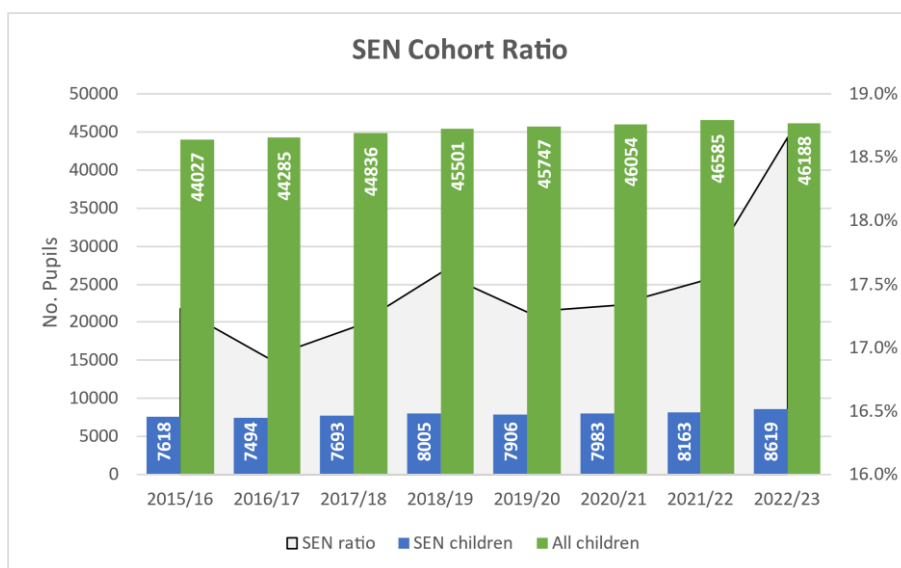
Area	Total Pupils – school population only	Pupils with EHCPs	%	Pupils with SEN support	%	Total pupils with SEND	%
England	9,073,832	389,171	4.3	1,183,384	13.0	1,408,701	17.3
London	1,461,472	65,345	4.5	176,999	12.1	221.368	16.5
Tower Hamlets	48,693	2,889	5.9	6,038	12.4	8,129	18.3

Source: <https://explore-education-statistics.service.gov.uk/find-statistics/special-educational-needs-in-england>

The percentage of Tower Hamlets pupils with EHCPs (5.9%) is significantly above the National (4.3%) and London average (4.5%), while pupils requiring SEN Support is above the London average at 18.3% opposed to 16.5%. The demand for special school placements and transfer requests from mainstream to a specialist setting education continues to grow above the available supply. Consequently, there is an increasing reliance on the independent/non-maintained sector to accommodate the additional students requiring specialist education.

The need for specialist placements demonstrates the consistent year-on-year growth, which has doubled over the past two years. Concurrently, there has been an exponential surge in requests for Education, Health, and Care Needs Assessments (EHCNA) within the borough. Currently monthly EHCNA requests have tripled compared to 2021, maintaining a rate of 90-110 assessment requests a year.

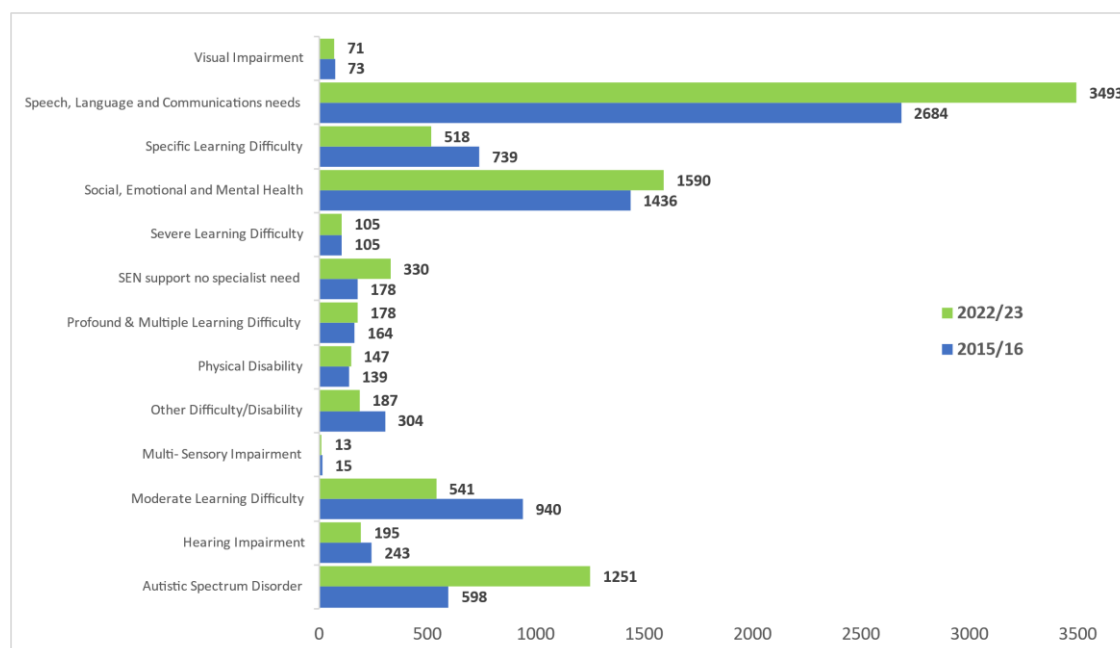
**Fig. 2: Breakdown of SEN children at school**



Source: <https://explore-education-statistics.service.gov.uk/find-statistics/special-educational-needs-in-england>

### SEND Historical and Projected Population Growth:

**Fig. 3: Tower Hamlets SEND population growth 2015 -2023:**

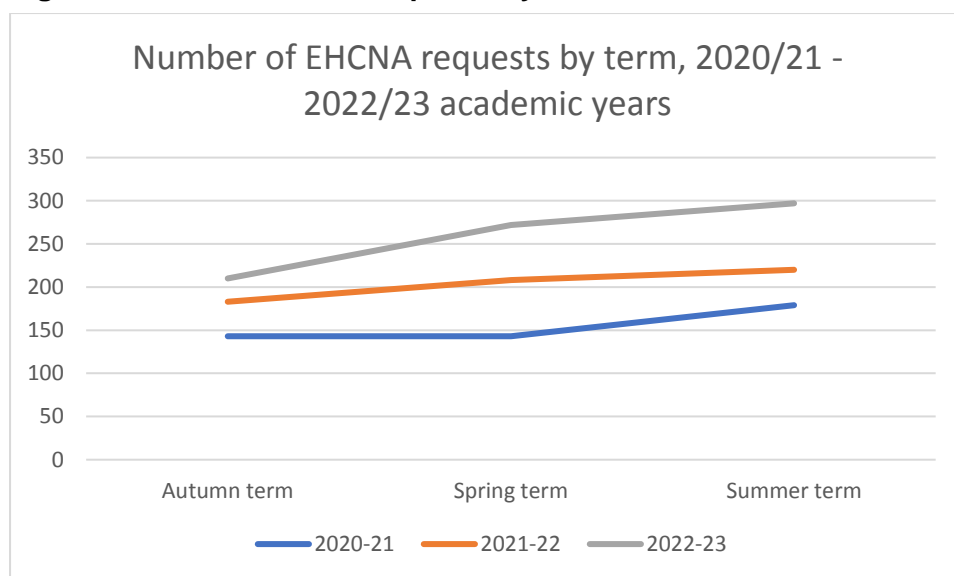


Source: <https://explore-education-statistics.service.gov.uk/find-statistics/special-educational-needs-in-england>

Fig. 3 displays the prevalence of Speech Language and Communication Needs (SLCN), as the most common special educational need across the borough and has increased by 30% since 2015/16. Autistic Spectrum Disorder (ASD) has experienced the largest increase among needs across the borough rising by 109% since 2015/16. In contrast, the demand for provision to accommodate Specific Learning Difficulty and Moderate Learning Difficulty have declined over the same period. The demand for provision to meet the needs of children with Social Emotional and Mental Health Needs (SEMH) continues as the second largest SEN requirement in Tower Hamlets with demand remaining stable since 2015/16, a trend that is shared by demand for Profound & Multiple Learning Difficulty (PMLD).

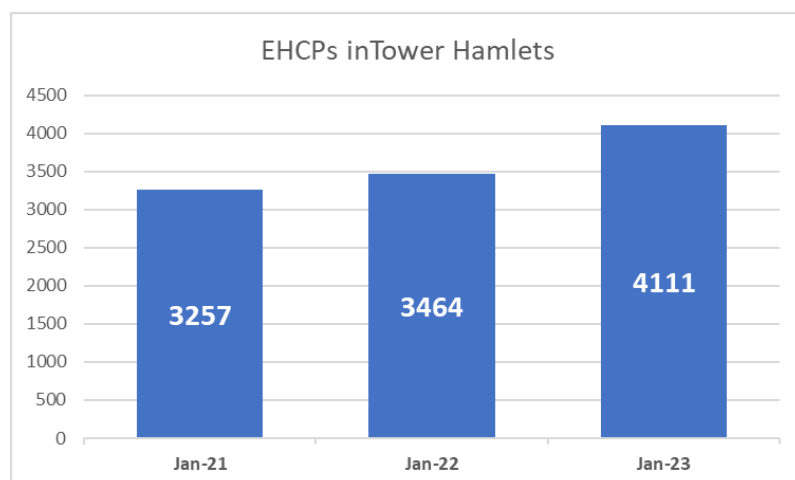
There has been significant increase in the number of new requests for EHCNA seen in recent years: 780 requests for the 2022/23 academic year, against 611 for the 2021/22 academic year, and 465 for the 2020/21 academic year:

**Fig. 4: Number of EHCNA requests by term, 2020/21 – 2022/23 academic year**



In one year, the number of EHCPs issued by Tower Hamlets has increased from 400 in the 2021/22 academic year, to 700 in the 2022/23 academic year.

**Fig. 5: Growth of EHCPs in Tower Hamlets 2021 -2023**



The total number of EHCPs for which the LA is responsible for has risen from 3257 (January 2021) to 4111 (January 2023), representing 26% increase over the period. This increase in demand is reflected nationally: there has been a 14% increase in the total number of Plans between 2020 and 2022 (last available DFE figures).

**Fig. 6: Numbers and Percentages of Pupils with EHCPs within each setting:**

	Tower Hamlets		London		England	
	No.	%	No.	%	No.	%
Independent School	105	4.2	4,885	3.3	28,732	4.9
Non-Maintained Special School	N/A	N/A	252	100	3,995	98.2
State Funded AP school	19	14.2	490	22.8	3,368	25.5
State Funded Nursery	12	3.5	137	1.7	673	1.8
State Funded Primary	1,126	4.5	23,052	3.3	117,757	2.5
State Funded Secondary	861	4.4	15,842	2.7	87,219	2.4
State Funded Special	766	99.7	20,687	97.4	147,427	98.9
<b>Total</b>	<b>2,889</b>	<b>5.9</b>	<b>65,345</b>	<b>4.5</b>	<b>389,171</b>	<b>4.3</b>

Fig. 6 indicates that:

- Tower Hamlets has comparatively higher numbers of pupils with EHC plans in mainstream settings than national and London averages,
- Tower Hamlets has significantly fewer pupils with EHC plans in Pupil Referral Units comparative to national and London averages,
- Tower Hamlets has more pupils with EHC plans in state funded special schools than national and London averages,
- Tower Hamlets has significantly more pupils with EHC plans in state funded nursery schools than the national and London averages.

**Fig. 7: Numbers and Percentages of Pupils with Sen Support within each setting:**

	Tower Hamlets		London		England	
	No.	%	No.	%	No.	%
Independent School	203	8.1	20,645	13.8	89,840	15.2
Non-Maintained Special School	N/A	N/A	0	0	57	1.4
State Funded AP school	82	61.2	1,251	58.2	7,518	57.0
State Funded Nursery	60	17.4	1,591	20.1	6,381	17.0
State Funded Primary	3,562	14.1	88,692	12.6	629,184	13.5
State Funded Secondary	2,129	10.8	64,364	11.1	448,967	12.4
State Funded Special	2	0.3	456	2.1	1,437	1.0
<b>Total</b>	<b>6,038</b>	<b>12.4</b>	<b>176,999</b>	<b>12.1</b>	<b>1,183,384</b>	<b>13.0</b>

Fig. 7 indicates that:

- Tower Hamlets has significantly less pupils with SEN support in state funded special school's comparative to national and London averages,
- Tower Hamlets has more pupils with SEN support in state funded AP and state funded primary schools than national and London averages,
- Tower Hamlets has less pupils with SEN support in state funded nursery schools than the London averages.



## Current SEN Capacity:

### Mainstream:

There are 67 mainstream primary schools, and 16 secondary schools. From a SEND angle, at the end of the 2022/23 academic year, there were 4422 EHCPs held by the Borough, of which 3370 are of school age (Reception through to Year 13). Most school-age children and young people – 70% – in Tower Hamlets are educated within mainstream settings. This is above the national average. Similarly, the SEN Support profile of the borough is above the national average.

The two largest areas of need for our children and young people are Speech Language and Communication Need (SLCN), and Autism. The third largest area of need is SEMH, which is also one of the fastest emerging areas of need as well. Together, SLCN and Autism account for 60% of all EHCPs. This is a profile of need found both locally in London, and in statistical neighbours.

### Special School Provision:

There are 5 special schools located in Tower Hamlets which accommodate a variety of needs across both the primary and secondary sector.

Tower Hamlets has two state funded special schools with approximately 240 places to cater for children with complex learning needs. Broadly these schools are for children with learning difficulties (moderate to severe or Profound and Multiple Learning Disabilities (PMLD) with associated, additional complex special educational needs (for example, speech, language, communication difficulties, autistic spectrum disorders, neurodevelopmental disorders, global delay). Stephen Hawking Special School caters for children aged 2 to 11 and Beatrice Tate Special School for children and young adults aged 11 to 19.

Tower Hamlets has one maintained (state funded) special school for children with Autistic Spectrum Conditions (ASC), Phoenix School. Phoenix recently expanded its pupil capacity from 470 to 500 for the 2023/24 academic year. The school operates on two main sites, along with two satellite sites, comprised as follows:

- Phoenix Lower School at Bow Road with capacity up to 248 pupils aged 3-11
- Phoenix Upper School at Paton Close with capacity up to 205 pupils 12 - 19
- Phoenix Primary Satellite Site at Marner Primary School with capacity up to 18 pupils aged 5-11
- Phoenix Secondary Satellite Site at Bow Secondary School with capacity up to 29 pupils aged 12-19

Tower Hamlets has two state funded special schools with approximately 95 places to accommodate for children SEMH. The provision landscape for children with SEMH is quite complex, reflecting the breadth of profiles of children who cannot be educated in typical mainstream school settings. Ian Mikardo High School is a Multi Academy Trust (MAT) special school that caters for SEMH children aged 11-19. Bowden House School is a LA- maintained special school that accommodates SEMH children aged 9 to 18. Both schools cater for pupils with significant and pervasive SEMH needs with behavioural challenge arising from neurodevelopment difficulties requiring significant and long-term specialist intervention including therapeutic component via clinical therapies or a residential 24-hour curriculum.

**Fig. 8: Special school provision in Tower Hamlets**

Special School	Total Places	Primary need
Beatrice Tate	115	PMLD/SLD
Bowden House	40	SEMH
Phoenix	500	ASD/SLCN
Ian Mikardo	55	SEMH
Stephen Hawking	105	PMLD/SLD

#### Resource Bases and Special School Satellite Sites:

Resource Provisions are specialised education provision integrated into individual mainstream schools. Children are officially registered as part of the mainstream roll of the school where the Resource Provision is located. Children and young people in Resource Bases are ordinarily expected to attend their mainstream class for at least 50% of the time, accessing the Resource Base for more specialist direct intervention and support.

Satellite sites, on the other hand, offers a place on the roll of a special school which operates the satellite, but for children and young people typically of a higher cognitive ability than in the main special school site. These satellite sites, though co-located with a mainstream school, are entirely separate and independent of their mainstream host. However, there are opportunities for some elements of a mainstream curriculum to be incorporated into their learning and provision. Resource Provisions and Satellite Sites play a pivotal role in the Tower Hamlets, contributing significantly to the broader objective of promoting mainstream inclusion.

**Fig. 9: Resource Bases and Satellite Sites in Tower Hamlets**

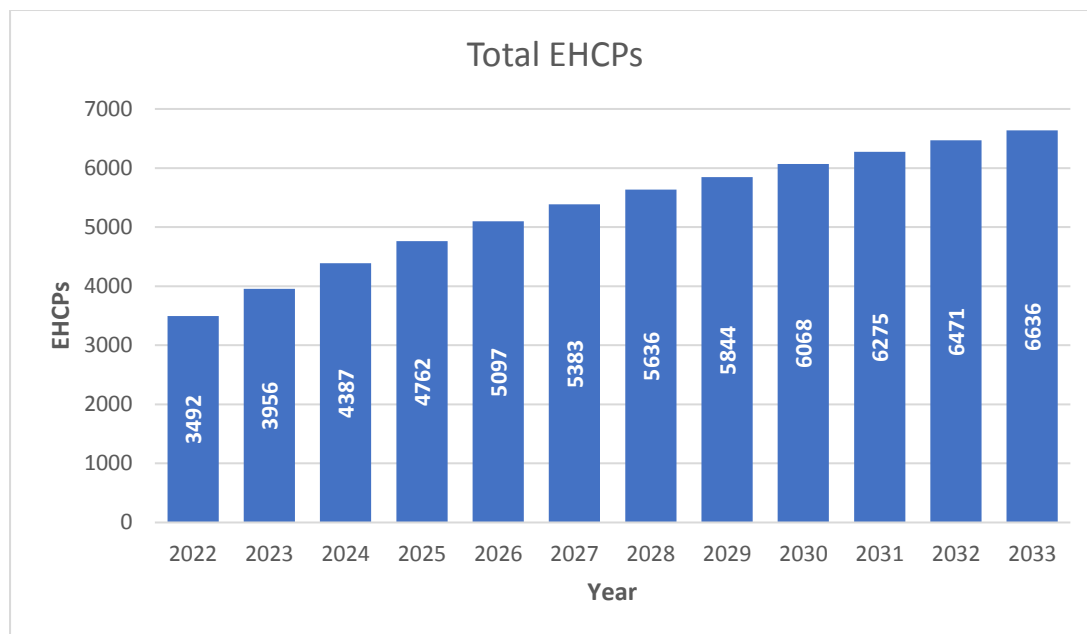
School	Resource Base or Satellite Site	Total number of places available	Primary need
Bangabandhu Primary School	Resource Base	15	ASD
Ben Jonson Primary School	Resource Base	12	SEMH
Culloden Primary Academy	Resource Base	30	HI (Hearing Impairment)
Cyril Jackson Primary School	Resource Base	20	SLCN
Globe Primary School	Resource Base	30	SLCN
Hague Primary School	Resource Base	16	HI (Hearing Impairment)
George Green's Secondary School	Resource Base	15	ASD
St Paul's Way Trust Secondary School	Resource Base	24	HI
Marner Primary School, Phoenix Satellite Site	Satellite Site	18	ASD
Bow Secondary School, Phoenix Satellite Site	Satellite Site	29	ASD

## Needs Analysis:

### Number of EHCPs:

EHCP numbers are still estimated to increase over the upcoming decade. In the short term, EHCP figures are projected to escalate from 3,956 in 2023 to 6,637 by 2033, representing an 67.7% growth in EHCPs over the next 10 years.

**Fig. 10: Tower Hamlets EHCP projections 2022-33**



### EHCP Projections by Phase:

Across primary, secondary, and post16/19 stages of education, SLCN, Autism and SEMH are projected to be the largest areas of need in the Local Area, and whilst there will be significant demand still yet for specialist placements and provision, majority of our pupils will continue to have placements in mainstream settings.

#### Primary:

Fig. 11 below shows that SLCN is projected to be the most prominent SEN need among primary children in the borough, demand is projected to peak at c.900 primary children requiring an EHCP for SLCN by 2029. ASD is projected to be the second most prominent need among primary children, with approximately 500 EHCPs for primary children with ASD by 2025. ASD demand is not projected to increase significantly but instead remain stable over the coming years.

Turning to look at the settings in which pupils will be educated, fig.12 indicates that the increase of primary EHCP pupils will continue to be educated within an LA maintained mainstream setting as opposed to a LA special school or Academy mainstream setting. Overall projections anticipate approximately 1400 primary EHCP pupils to attend either an academy or LA mainstream setting by 2033, compared to c.340 pupils projected at Special LA maintained schools.

Fig. 11: Primary EHCP Projections by Need

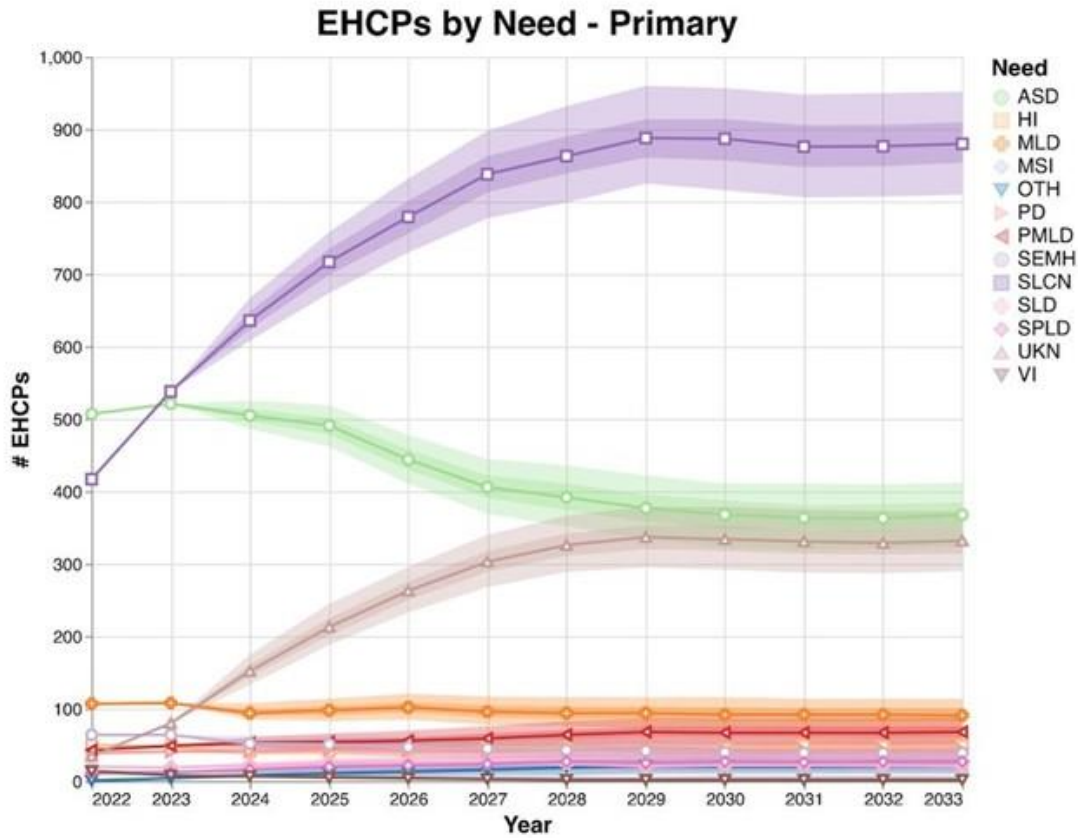
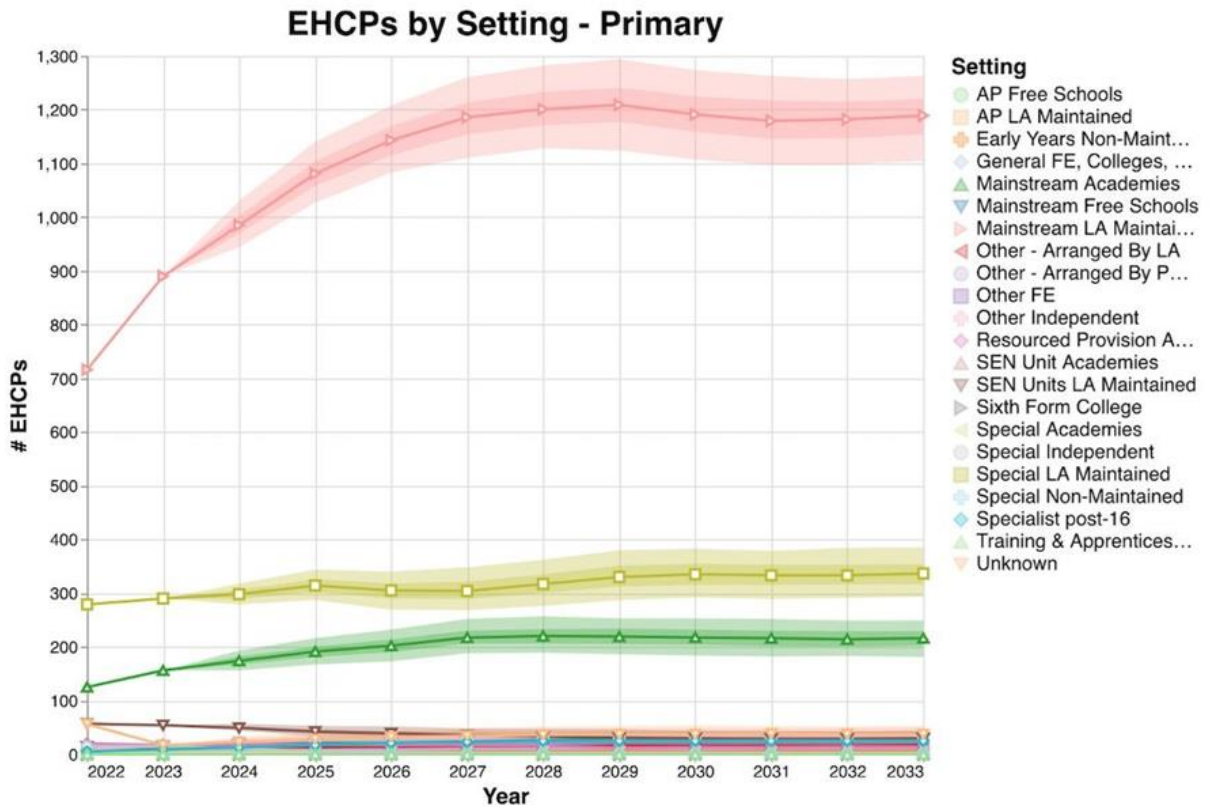
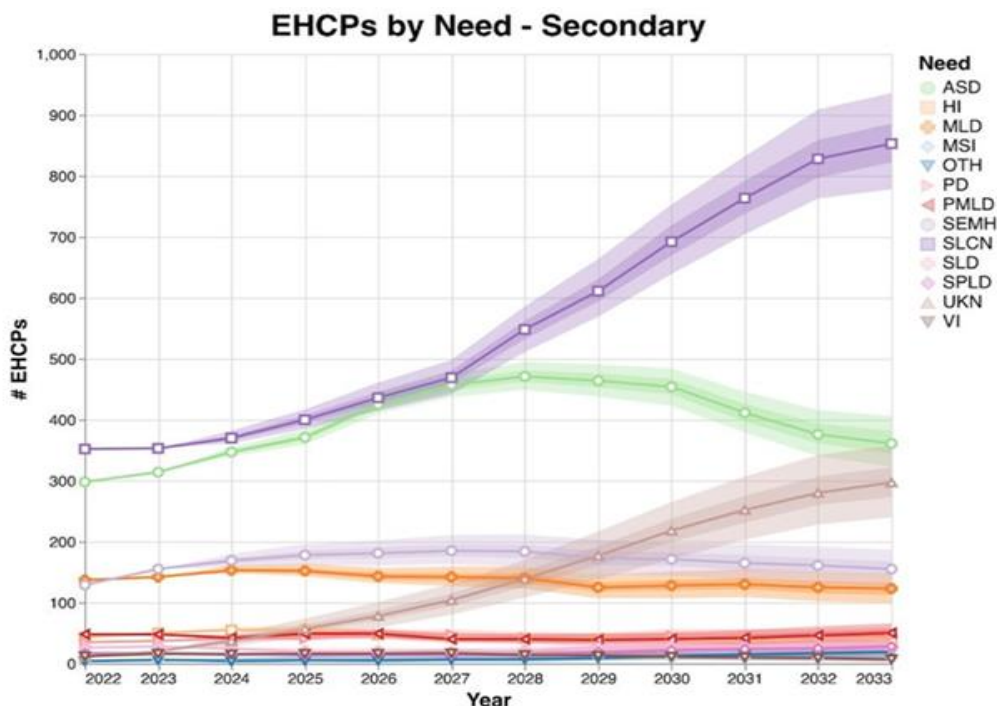


Fig. 12: Primary EHCP Projections by Setting



## Secondary

Fig. 13: Secondary EHCP Projections by Need



SLCN is projected to be the largest area of need among secondary children, with approximately 850 secondary EHCP children projected by 2033, then Autism as the second largest need. However, as pupils become older, there is increasing need in SEMH.

Fig. 14: Secondary EHCP Projections by Setting

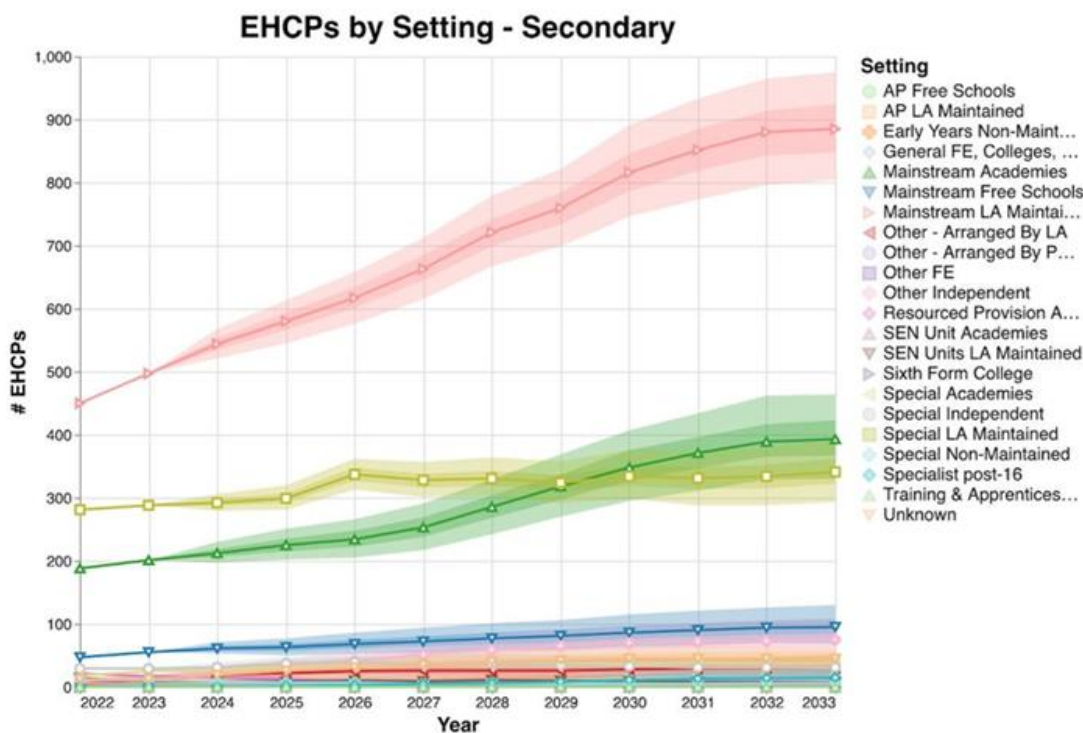


Fig. 14 suggests that the increase of secondary EHCP pupils will be accommodated at either an Academy or LA mainstream settings, with c.1300 pupils expected a mainstream setting in 2033. Due to limited capacity at special school provision pupils attending LA special schools are not projected to increase significantly with c.340 pupils projected to attend LA maintained special provision by 2033.

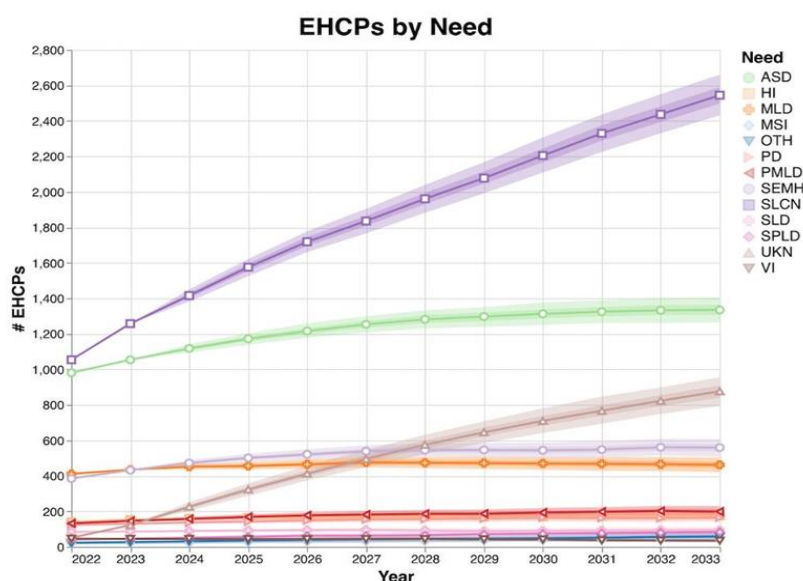
### Post-16 and post-19:

At post-16 and post-19, we see that General Further Education (mainstream FE settings) continue to dominate, with a second high area of need in maintained sixth form provision. However, turning to post-19, there is increasing demand for specialist post-19 provision, with a 66% increase in demand for such settings. Looking at areas of need for post-16 and post-19, there is significant rise in the number of EHCPs supporting young people with Autism and SLCN; come post-19, there is also significant growth in SEMH and MLD.

### EHCP Projections by Needs

Fig. 15 indicates SLCN is projected to continue to be the largest SEN primary need for children requiring an EHCP across the borough, with Autism second. SEMH shows growth and moves to be the third largest area of need in the Local Area. There is growth too in MLD, with it moving over time to become our fourth largest area of need.

**Fig. 15: Total EHCPs Projections by Need**



### Speech, Language and Communication Needs:

In Tower Hamlets, the two largest primary need groups for EHCPs are Speech, Language and Communication Needs (SLCN) and Autism (ASC/D) and these two areas of need account for two-thirds of EHCPs in the Local Area. Feedback from stakeholders and information from Bart's NHS Community Therapies shows a significant rise in demand for Speech and Language assessment, with a tripling in demand over the last two years (2021-23).

Within the Borough, specialist provision for SLCN is met in Resource Bases at Cyril Jackson Primary School and Globe Primary School. There are 20 places at Cyril Jackson, and 30 at Globe Primary School.

**Fig. 16: Primary EHCP Projections for SLCN Resource Provision**

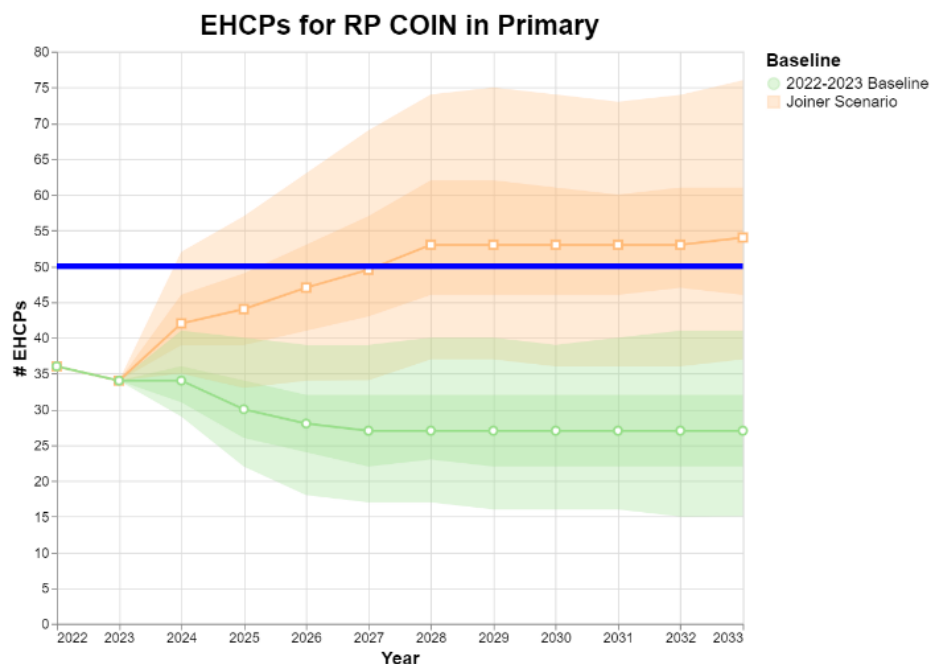


Fig. 16 indicates that there is limited capacity across both settings. There is a high level of variability in number projections for these settings: the blue line indicates the maximum capacity at present. At the upper band, there is a shortfall on capacity, if the rate of new EHCPs with SLCN continues as it is. Taking a longer-term average of issuing however, and there will be capacity available towards the end of the decade. The variability here is due to those with SLCN subsequently receiving a diagnosis of Autism, which changes their primary need; SLCN settings are also not designed currently for educating those with Autism, but for those with Disordered Speech and acute language and communication needs.

The mid-model scenario suggests there is sufficient SLCN specialist provision at Primary level, however this will need to be kept under review as referrals for Speech and Language assessment and therapy come via the NHS.

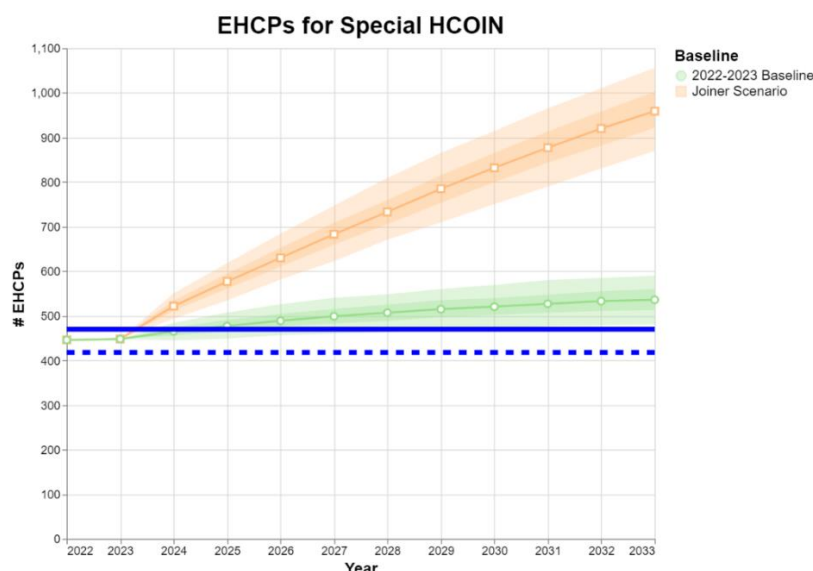
Tower Hamlets does not have specialist SLCN provision at Secondary level. Currently, there is limited demand for such provision, as majority of SLCN at secondary level continues to be met within mainstream settings, or where appropriate and with a diagnosis of Autism, in specialist Autism provision.

**Autism:**

The incident rate of Autism in EHCPs and on ASDAS assessment pathways is 25% higher than the national average. Whilst there have been significant increases in requests for assessment of Autism, this is also a historic pattern of need within Tower Hamlets. There may be an over classification of SLCN, due to delays in children and young people receiving their diagnosis of Autism, which is a national challenge.

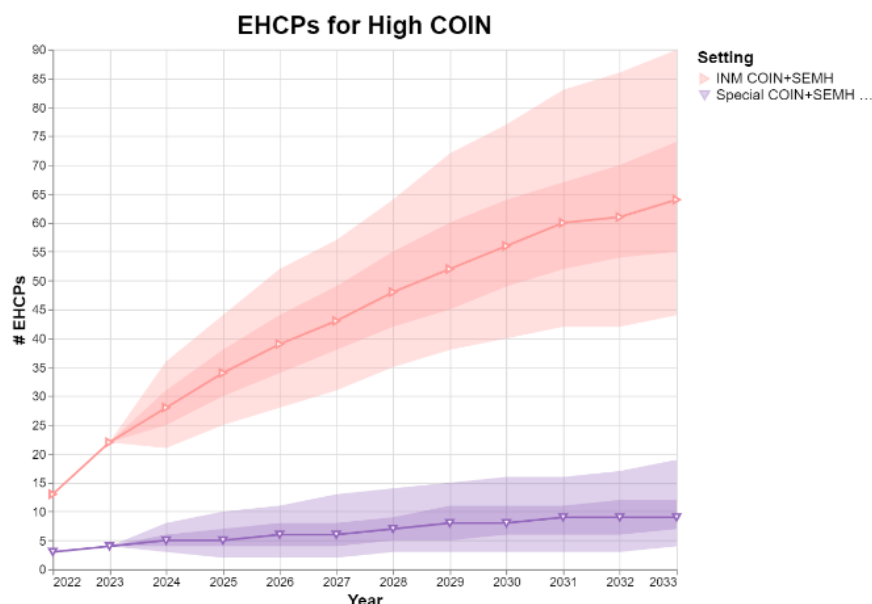
The Borough is committed to meeting the needs of children and young people with Autism locally. It is clear from analysis that Phoenix School, the Borough’s specialist provision for children and young people, Nursery through to Sixth Form, is at capacity.

**Fig. 17: EHCP Projections for Autism at Special School Provision**



The blue line shows the capacity of Phoenix School, 470 at the time of recording, though their Pupil Allocation Number has been updated for the 2023/24 academic year to 500 pupils across all age ranges: this has been done in recognition of Phoenix School taking in additional pupils beyond their intended capacity in the past, to ensure proper and correct funding. Fig. 13 highlights a significant variance between potential outcomes, based on a long-term historic trend demand would surpass capacity by 2026 and result in a shortfall of c.100 places by 2033. Alternatively, based on the elevated rate post-pandemic demand would exceed the capacity by 2024 and grow to c.500 place deficit by 2033. If the baseline scenario is taken, it may be reasonable to take a middle route on placement demand and anticipate a potential shortfall therefore of between 75 and 125 places by the end of the decade.

**Fig. 18: EHCP Projections for Autism at Mainstream vs Special School Provision**



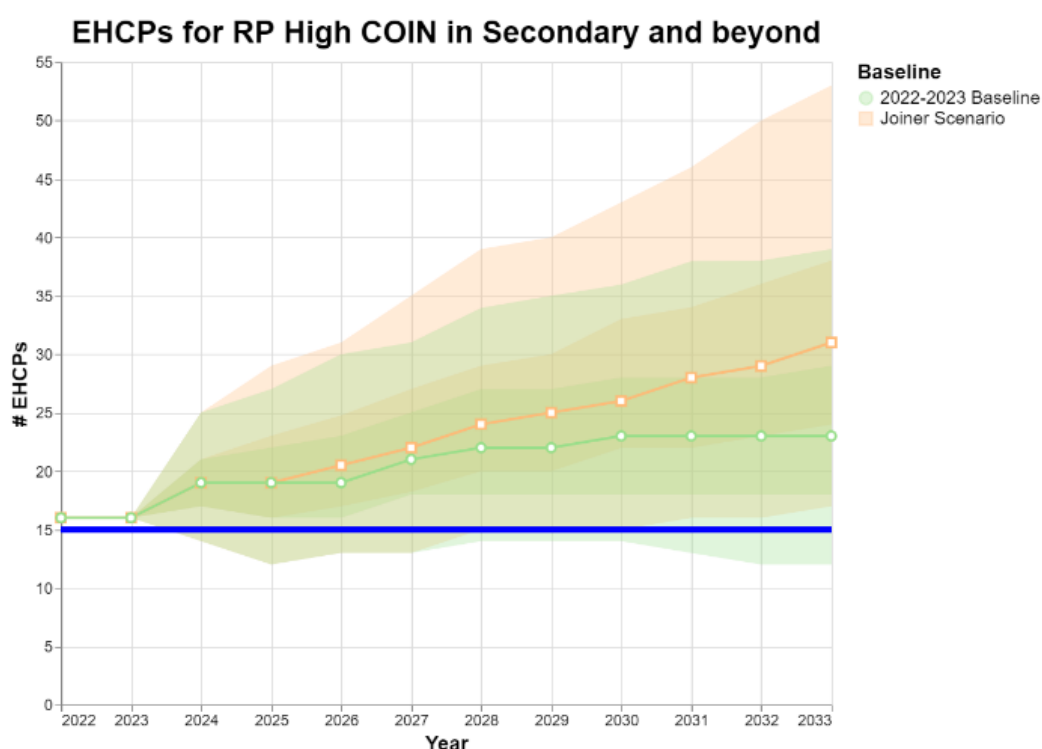
This lack of capacity in Autism specialist placements spills out into neighbouring Local Authorities and the independent sector. There are 25 CYP being educated out of borough and 13 in independent schools who could be educated in Phoenix. There are another 108 in Specialist Post-16 provision, but they may not be the right pupils for Phoenix, given the increasing complexity of Autism need as pupils become young adults and there is greater involvement from social care come living arrangements and future planning.



This does not negate current and acute demand for specialist Autism placements and provision: there are around 45 consultations a year to Phoenix School which may be appropriate, but the pupils cannot be placed there due to capacity constraints. Phoenix School holds a list of 90-100 pupils for whom placement may be appropriate, but there is no capacity to admit.

There is additional resource now in the Borough for middling-high Autism need. George Green’s School (secondary) has recently (2023/24 academic year) had its resource base redesignated from Physical Disability to Autism. The pupils it admits require specialist resource, provision, and teaching, beyond that which might ordinarily be delivered within a mainstream school but below that which is delivered within Phoenix School. This resource is already at capacity, and is likely to be significantly over-demand imminently.

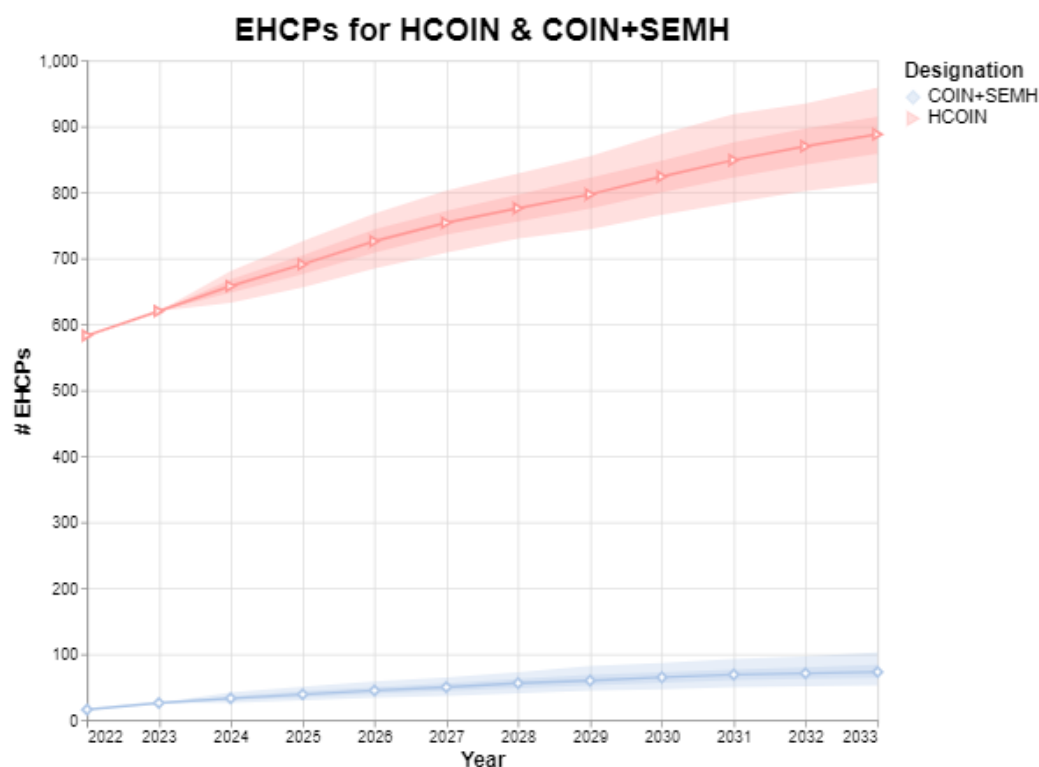
**Fig. 19: Secondary EHCP Projections for Autism Resource Provision**



There are 15 places available in the George Green’s Resource Base. There are 16 on-roll there. Upper and lower band demand suggests a shortfall of between 10 and 35 places by the end of the decade. It must also be noted that 2/3 of pupils in Tower Hamlets with a diagnosis of Autism and having an EHCP are educated within a mainstream setting: this is slightly above the London-wide average of 60%. Nonetheless, there is a significant shortfall on specialist provision for Autism, particularly at Secondary level and in the special school sector.

Fig. 20, below, indicates a rapidly emerging area of unaccommodated need within the Local Area for children and young people who have complex needs across several areas: they may have a diagnosis of Autism, combined SEMH or SLD, and consequently their behavioural and learning profile can make a placement in Phoenix a challenge.

Fig. 20: EHCP Projections for Autism & Combined SLCN/SEMH



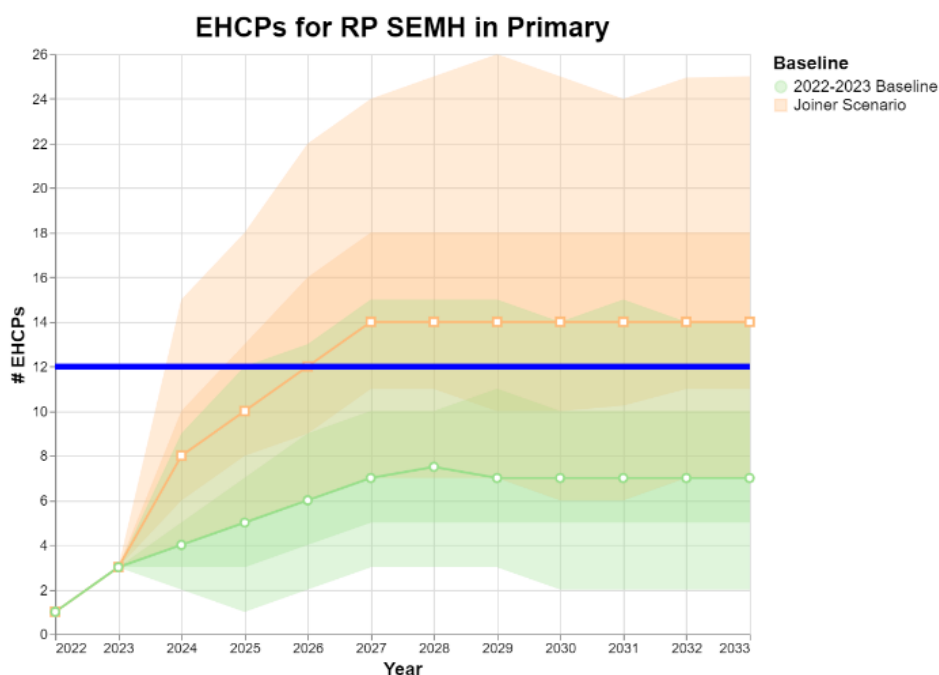
#### Social, Emotional and Mental Health:

Feedback on SEMH was particularly strong from stakeholders, and projections on placement and provision (demand), and EHCP numbers, suggests an increasing need in this area across all ages and stages, with particular concerns at Key Stage 2 and Secondary levels. This increase in SEMH presentation is not unique to Tower Hamlets, however the gap between demand and placement availability is driving exclusion rates up (particularly in primary schools) and an increase in the use of the independent sector and in Alternative Provision, in and out of borough.

There is a gap in pre-statutory level SEMH support for mainstream schools. The Borough offers a Behaviour Support Service, which works with schools and settings on a traded basis, and in an advisory whole-school capacity. It does not offer pupil-level support and direct work.

There has been a minor expansion of Bowden House School to include an 8-place specialist primary division, co-located at Ben Jonson Primary School; this is now full. Ben Jonson Primary School itself has a designated SEMH resource base, but due to capacity constraints in the whole school (Resource Base pupils must be registered against mainstream classrooms) they have only been able to admit 3 pupils into this.

**Fig. 21: Primary EHCP Projections for SEMH Resource Provision**



At Secondary level, there is capacity within Ian Mikardo School, an Academy special school. There is no capacity within Bowden House, the Borough’s specialist SEMH residential school.

**Fig. 22: EHCP Projections for SEMH Special School Provision**

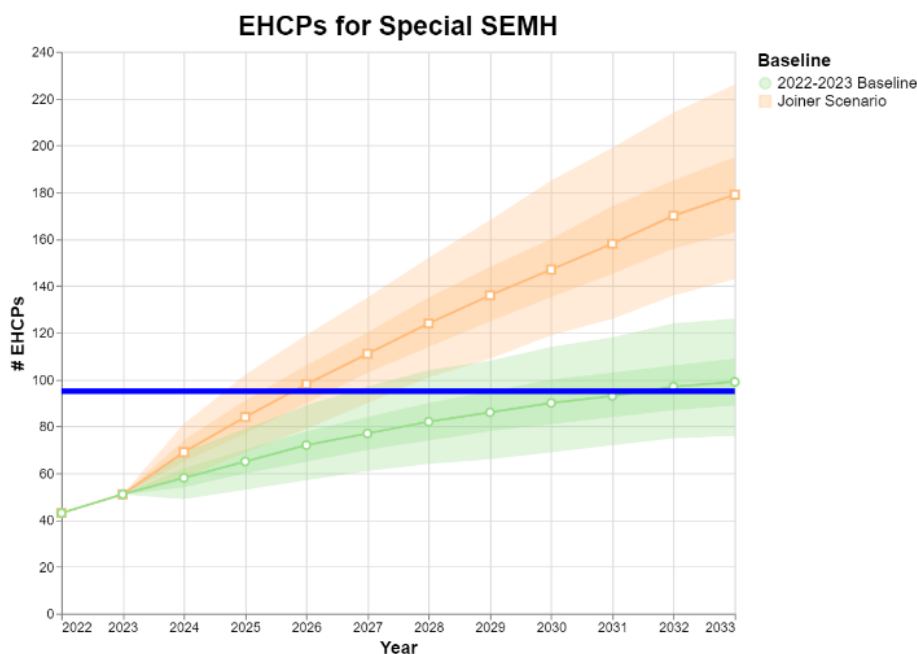
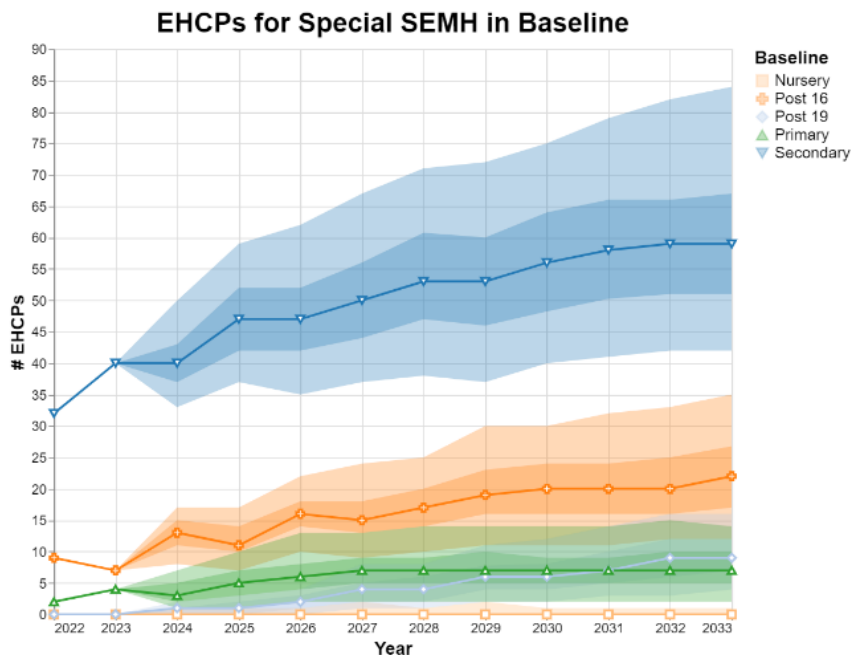


Fig. 22 shows significant growth in the number of EHCPs with SEMH as the primary need, and even accepting the available capacity by numbers in our resource bases and Ian Mikardo, there will be shortfall on specialist provision by the middle of the decade. This increase in SEMH is particularly acute in secondary age pupils as shown in Fig. 18, below. Overall from this analysis, there is a projected shortfall of between 30 and 60 places in SEMH specialist settings: between 10 and 25 at primary stage, and between 20 and 35 at secondary.

**Fig. 23: EHCP Projections by Phase for SEMH Special School Provision**

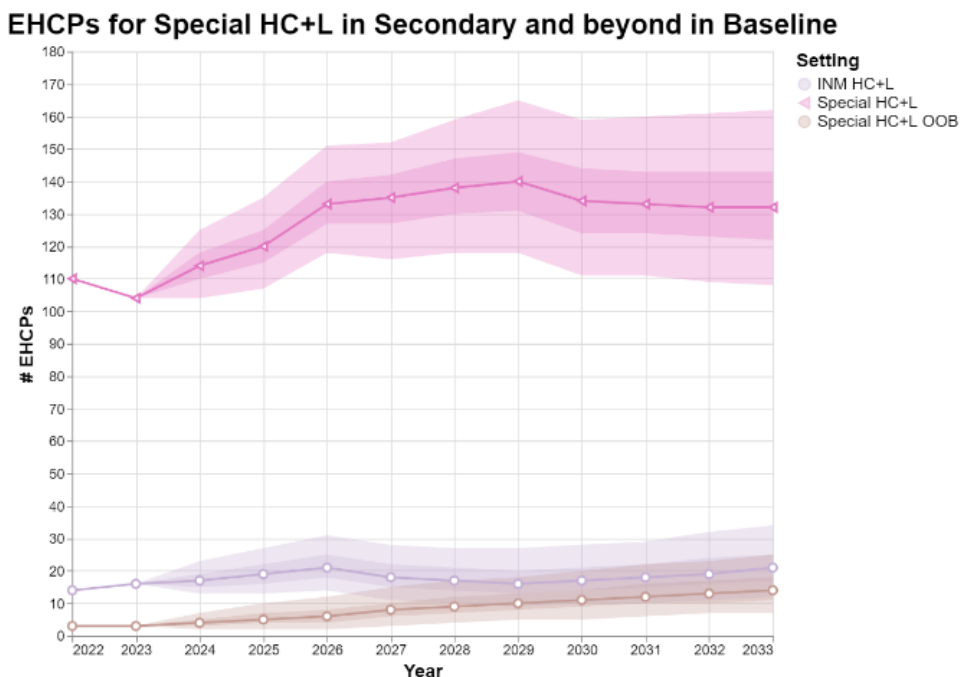


The projections suggests that SEMH is a rapidly changing and growing area of need, and there is a significant shortfall in specialist placements. Furthermore, there is a need for much earlier intervention and support, including at SEN Support level, in order that SEMH needs are identified, and met, earlier than currently. And behaviour is addressed through in-school discipline measures before statutory assessment is sought and changes of placement to specialist provision occur.

**Cognition and Learning:**

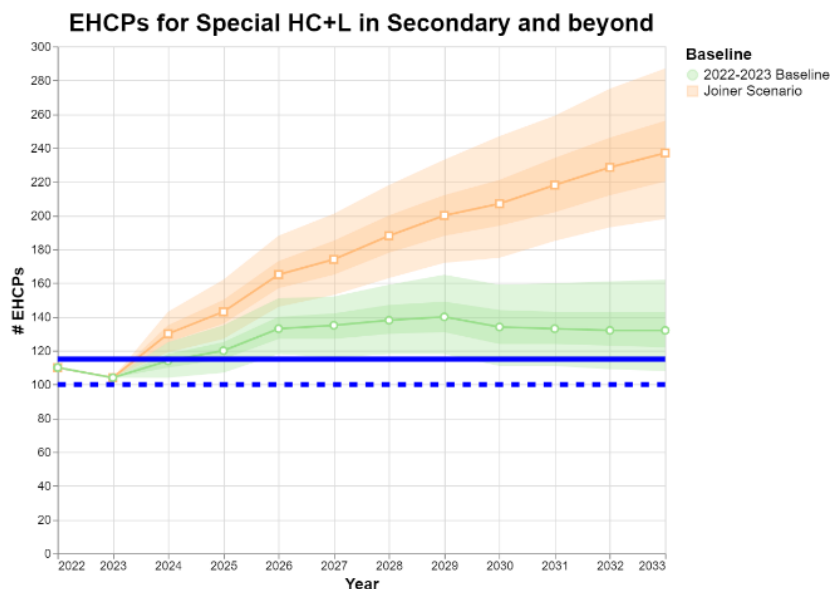
Meeting the needs of children and young people with cognition and learning difficulties is a relative area of strength for Tower Hamlets, with over 75% of pupils with Mild Learning Difficulties educated within mainstream settings.

**Fig. 24: Secondary EHCP Projections for Cognition and Learning School Provision**



However, at the very most complex levels of need, there are significant capacity constraints. At secondary level particularly, there is already a shortfall within Beatrice Tate School, for pupils with PMLD and physical needs; Beatrice Tate also admits pupils with a secondary / additional need of Severe Learning Difficulties.

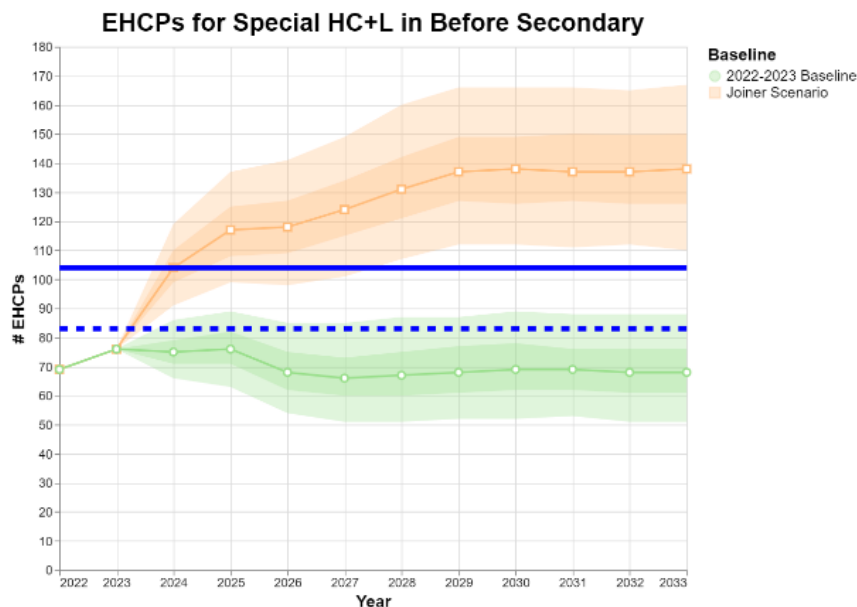
**Fig. 25: Secondary EHCP Projections for Cognition and Learning Special School Provision**



In Fig. 25, both upper and lower bands of projections show a significant shortfall in specialist placement, of up to 100 places. As a result, also seen above, there is an increasing call upon placements in the independent sector and out of borough. This is in part driven by increasing demand for specific SLD placements at Phase Transfer into Year 7 at secondary school.

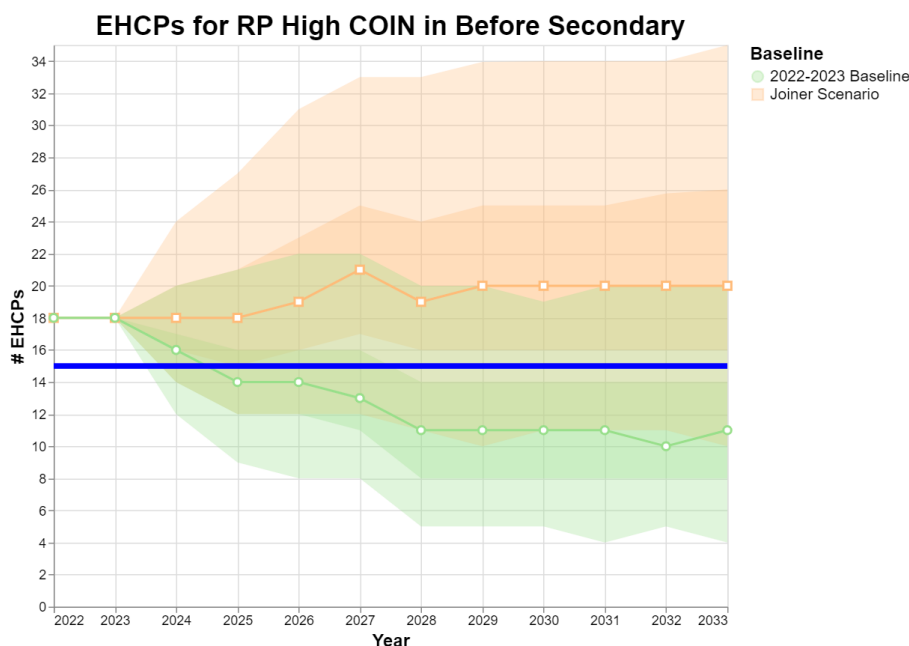
Children and young people increasingly have needs identified in a range of areas, and so their needs do not neatly fit into single-need schools all the time. Like a mixed profile of Autism and SEMH as described above, pupils with PMLD/SLD increasingly have additional needs, especially with needs of Autism and/or SEMH. Currently, placement of these pupils is not always possible given the designation of Beatrice Tate School.

**Fig. 26: Primary EHCP Projections for Cognition and Learning Special School Provision**



At primary level, there is again shortfall in specialist PMLD / SLD provision as shown in Fig. 26. The borough has Stephen Hawking School (nursery to Year 6) as a specialist school and operates a specialist resource base for complex needs at Bangabandhu Primary School: Most of these pupils have needs of PMLD and/or physical needs. Placement shortfall in Stephen Hawking is accommodated by Bangabandhu Resource Base.

**Fig. 27: Primary EHCP Projections for Cognition and Learning Resource Provision**



The Bangabandhu Resource Base has capacity roll for 15 pupils; however, it is currently at capacity, and there are 3 consultations to the setting every 2 months, indicating significant demand for the provision. This data error is under investigation and will be corrected by January 2024.

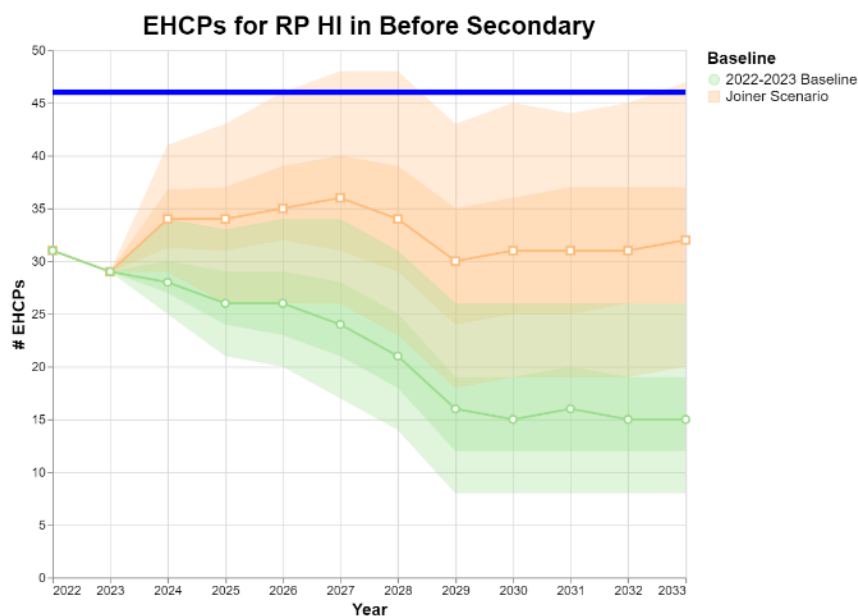
Both Beatrice Tate and Stephen Hawking Schools offer outreach services to mainstream settings to support with pupils with physical needs, educated within mainstream settings and able to access a mainstream, or mainstream differentiated, curriculum. In addition, the Educational Psychology Service and Learning Advisory Service offer support too for pupils with MLD/SLD, and physical needs and disabilities.

Nonetheless, there is a significant shortfall on placements for SLD/PMLD pupils, especially at secondary school.

#### Physical Disability and Sensory Needs:

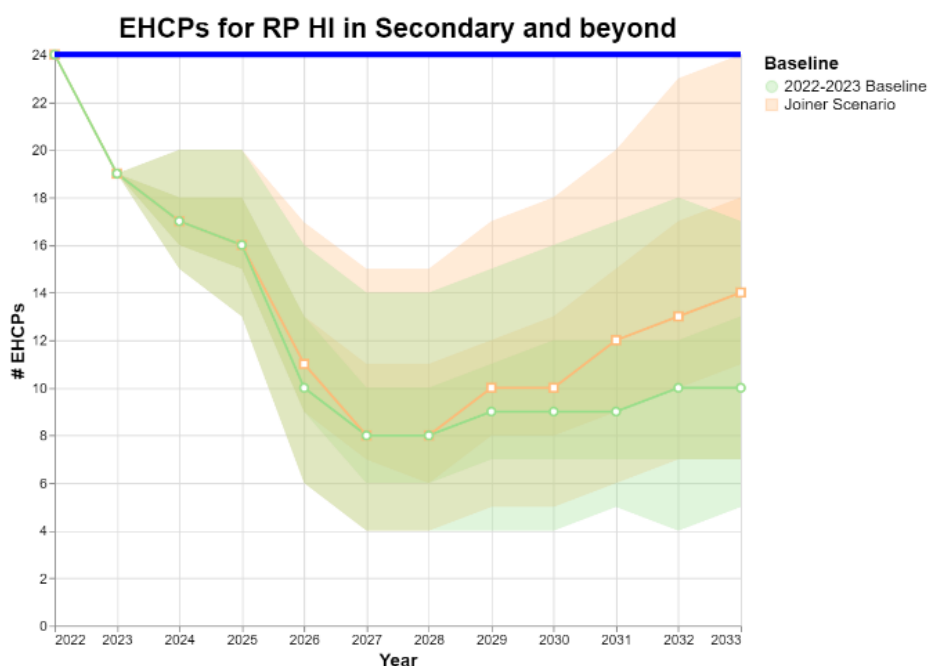
Tower Hamlets is unique as a London Local Authority, with an incident rate of physical need over twice the national average, especially in Hearing Impairment (HI). Most pupils with Hearing Impairment do not have an EHCP and are educated within mainstream settings at SEN Support level, with guidance and input from the Learning Advisory Service along the way.

**Fig. 28: Primary EHCP Projections for Hearing Impairment Resource Provision**



As a result, there is a declining number of EHCPs year on year projected for H.I. need, requiring specialist provision, at both primary (Fig. 28) and secondary (Fig. 29) school ages, and therefore current provision delivers appropriate levels of capacity for H.I. needs within the borough for the foreseeable future:

**Fig. 29: Secondary EHCP Projections for Hearing Impairment Resource Provision**

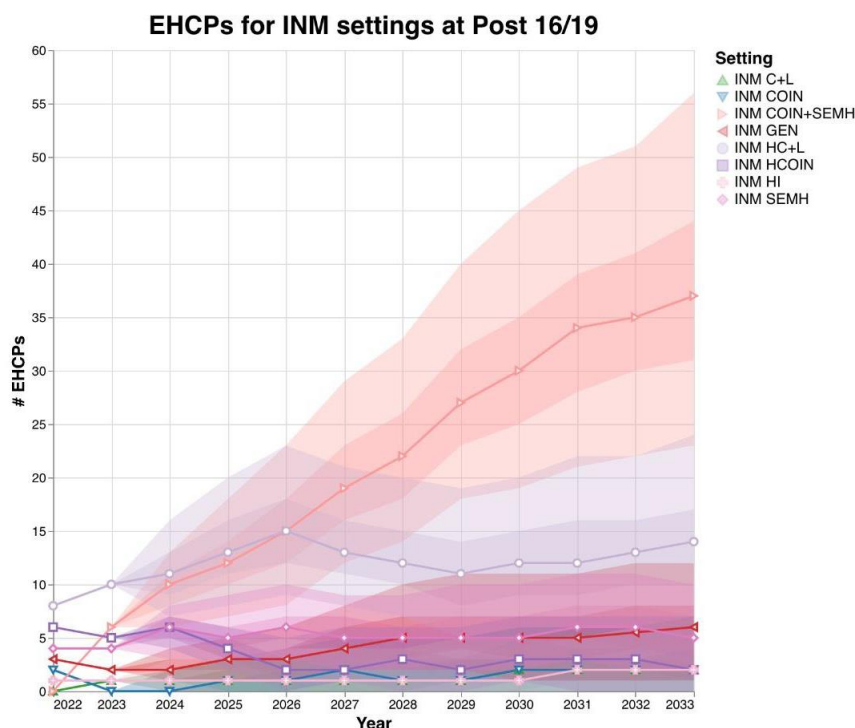


**Preparing for Adulthood:**

There is significant growth in EHCPs for post-16 and post-19 pupils to the end of the decade: this is due not to population growth, but due to children and young people not having their EHCPs ceased as they move through the education system. Preparing for Adulthood spans all areas of need. We have seen that specialist provision in all areas of need except HI are over capacity at secondary level and beyond and will remain so unless action is taken to address the shortfall.

There is a significant shortfall of specialist provision post-16 and post-19 for pupils with SLD and PMLD, who would otherwise be educated at Beatrice Tate School. Although there is flat further demand for placements post-16 and post-19; as the setting is already over capacity. There are currently no local providers able to offer a post-19 curriculum for these most complex pupils, leaving them to attend either residential or out of borough provision, or both. This has significant implications for spend on both placements and travel.

**Fig. 30: Post 16/19 EHCP Projections by Need at Mainstream Provision**



This is similarly seen in Phoenix School, with a shortfall in availability for placements at post-16 and post-19. Currently, Phoenix College provides post-19 provision for pupils with Autism. Phoenix College is a charitable third-sector provider. It delivers its provision supported by Phoenix School, but as a separate entity. It is currently located on the site of Phoenix School. There is no scope for the college to expand its current premises; the college with the Borough is seeking alternative accommodation to allow it to grow from circa 25 places, to circa 75 places. In review of SEMH needs, we again see this scenario of growth in EHCPs against a paucity of provision, and because of this there has been and is projected to be, an increase in use of the independent sector in all areas of need.

**SEN Sufficiency Review Conclusion and Proposed Actions:**

Significant amounts of data have been analysed throughout this process, and the projections on areas of need, and by demand, are strong for the short-medium term; as the projections are also for the next decade, there is some variation to the projections towards the end of the decade and into the early 2030s. Nonetheless it is clear that there is a significant shortfall of specialist provision and placements in the Local Area, which needs addressing quickly.



Autism; Speech, Language, Communication and Interaction; and SEMH continues to dominate the areas of need with the Local Area, with an emerging unmet need of SLD coming through right now, from primary, into secondary, and through to post 16 and post 19 provision. Long-term, there is a shortfall of around 260 specialist places in primary and secondary; more immediately and into the medium-term, there is a shortfall of 125 places, with 75 ASD and Communication/Interactions specialist placements needed; 25 SEMH placements needed; and 25 SLD (cognition and learning) placements needed, again in primary and secondary.

The Local Authority and schools are committed to meeting needs locally, and addressing the shortfall in specialist provision to ensure that all children and young people can access the provision and placements they need, at a time they need, and in a setting close to their home. We are proposing the following action plan:

1. The Local Authority will develop a Pilot programme of specialist Additionally Resourced Provision (ARPs) to address immediate need for specialist placements in the Borough.
2. It is intended that these Pilots ARPs will be delivered on a locality basis, aligned with the School Organisation Stakeholder Group's work, to ensure an even and effective distribution of specialist provision in the Borough.
3. These Pilot ARPs will need to come from the existing school estate and be a partnership basis between specialist and mainstream settings, with the support of the Borough.
4. The Local Authority will be solely responsible for placements into any Pilot ARPs, with the ARPs operated by the host school.
5. It is expected that pending any formal designation, these Pilot ARPs will be funded as though they are SEN Units, therefore meeting more complex needs than a Resource Base.
6. Major building work will not be considered, however repurposing, remodelling, and relocating some elements of existing premises will be.
7. It is anticipated that there will be up to 6 specialist Pilot ARPs established:  
x2 / x3 Autism / Communication and Interaction, x1 each at primary and secondary at least,  
x2 SEMH, x1 each at secondary and secondary,  
x1 SLD, at secondary.
8. Each Pilot ARP will need to have between 12 and 25 pupils, depending on the available size within the host school.
9. Whilst these will be the primary areas of need for each pilot ARP, there will need to be some flexibility in the profile of pupil admitted, given the evidence of secondary needs in our most complex pupils (e.g. Autism and SEMH / SLD).
10. Schools in the Borough will be approached for Expressions of Interest in operating Pilot ARPs early in the spring term of 2024, with service specifications prepared concurrently; a selection process will be run, with the involvement of all local education, health and social care stakeholders, including schools, and parent-carers, before summer 2024.

11. Being developed through minor works only, rather than full building work, it is anticipated that any Pilot ARPs would be operational within the 2024/25 academic year.
12. Though initially a Pilot programme, there will need to be a view to have a contractual commitment of any school to operate any ARP long-term, including funding commitments and regular review of the provision.
13. A small expansion of Phoenix School, within their existing premises, should be considered if viable, within the next 3 years.
14. The planned expansion of Beatrice Tate School, to accommodate pupils captured within the increased demand for specialist places within PMLD, continues.