

Integrated Impact Assessment (IIA)

Integrated impact assessment (IIA) form December 2019

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The integrated impact assessment is a quick and easy screening process. It should:

- identify those policies, projects, services, functions or strategies that could impact positively or negatively on the following areas:
 - Communities and safety
 - Regeneration and culture
 - Environment and public space
 - Equality & - Diversity - This can be found in Section A5

Directorate:

Children, Families and Education

Service, function:

Inclusion Service

Title of policy, service, function, project or strategy (new or old) :

Changes to the way that mainstream schools receive funding to support children with Education Health and Care Plans

Type of policy, service, function, project or strategy:

- Existing
- New / proposed
- Changed

What is the aim of your policy, service, function, project or strategy?

The aims of this change to the way that additional (element 3) funding is provided to mainstream schools to support the needs of children with Education Health and Care Plans (EHCPs) are:

- To continue to ensure that the provision identified in a child's EHCP is made in all cases

* To provide greater flexibility for schools to decide how best to meet a child's needs within an individual school context, over time,

- To provide greater predictability for schools in managing their budgets,
- To provide more equity and consistency across schools in providing for children with similar needs (e.g. equity of funding across mainstream schools with Inclusion Centres), and
- To enable better management of the Dedicated Schools Grant High Needs Block as a whole.

Background/rationale

A child or young person has special educational needs (SEN) if they have a learning difficulty or disability which calls for special educational provision to be made for them. Around 16% of children and young people in schools, colleges and early years settings have (SEN). Educational settings are required, according to the SEN Code of Practice to identify SEN and provide support to enable the child or young person to make progress, following an assess, plan, do review cycle. The majority of SEN Support can be provided from what is 'ordinarily available' in settings, funded from the setting's delegated budget. Schools are required to fund up to the first £6,000 of additional SEN Support for an individual child with identified needs.

A small percentage of children and young people (3-4%) will need more support than is 'ordinarily available' in schools, colleges and early years settings. For these children, a multi-agency needs assessment can lead to the issuing of an Education, Health and Care Plan (EHCPs) to specify the child or young person's special educational, health and social needs and set out the additional support required to meet those needs. Additional funding can be provided to deliver this provision. This is known as 'element 3' or 'top-up' funding and is in addition to the first £6,000 of support that is funded from a school's delegated budget.

In Portsmouth, there are approximately 1600 children and young people with EHCPs. Of these, less than half attend a mainstream school in the city, with the others attending special schools, inclusion centres, colleges, early years settings or schools outside of the city. Any additional funding to support children with EHCPs in mainstream schools in the city is provided in line with an individual Summary of Provision which is completed as part of the statutory assessment of the child's needs.

This method of calculating funding was introduced in Portsmouth in 2014 in response to the implementation of the Children and Families Act. It was intended to reflect the greater specificity of provision in EHCPs and the move away from an over-reliance on support being provided through one-to-one Teaching Assistant time. This method of calculating funding, however, has a number of disadvantages including a lack of flexibility for schools to make professional decisions about how best to support a child within that setting, as well as a lack of predictability for schools and the local authority in managing budgets.

It was therefore agreed that this method of funding EHCPs in mainstream schools would be reviewed. A task and finish group was established in 2019 with head teachers, SENCos and council officers and on the basis of this, a move to a banded funding model for children with EHCPs in mainstream schools was proposed, to be implemented from April 2021.

The Inclusion Service has worked with schools to develop criteria for each of the bands in order to be able to allocate a band to each individual pupil, based on their assessed needs, as set out in their Education Health and Care Plan. In some circumstances, as is the case currently, an EHCP may be issued where all of the provision can be delivered from what is 'ordinarily available' in schools. In this case, it is possible that the EHCP will have no element 3 top-up funding attached.

Under this proposed new funding model, as under the current funding arrangements:

- The LA will continue to provide schools with the funding to ensure that they can make the provision available that is specified in a child's Education Health and Care Plan, as set out in the Children and Family Act 2014 and the SEN Code of Practice 2015.

- It may be necessary to provide additional funding, as an exceptional arrangement, where a child's provision as specified in their EHCP, falls significantly outside of what could reasonably be provided from the allocated banded funding level.
- If it is deemed that the child's needs cannot be met from within the allocated funding (e.g. because the child's needs have changed) evidence can be provided through the statutory annual review process and a request made to the local authority that a higher band of funding is required.

Children who attend special schools in Portsmouth are already subject to a banded funding model, which has been in place for a number of years.

Has any consultation been undertaken for this proposal? What were the outcomes of the consultations? Has anything changed because of the consultation? Did this inform your proposal?

A consultation on these proposed changes has been undertaken with Portsmouth schools from 20th October to 13th November 2020. Schools were invited to submit any further comments on the proposed changes to the way that funding is allocated and the proposed banding criteria in response to this consultation.

Of the 61 schools in the City, two comments were received in reaction to the banding of mainstream Education Health and care plans (EHCP). Schools were provided with a table that set out the financial impact of the move to a banded funding model for EHCPs in mainstream schools. This was calculated based on the pupils in receipt of funding as at July 2020.

In response to one of the queries, this information will be provided to schools by the Inclusion Team in February in preparation for the implementation from 1 April 2021.

The second query raised a specific question in relation to the proposed funding provided for the Exceptional Band. The response to this query is set out below:

The proposed funding value of £4,300 Element 3 Top-up was calculated using the Element 3 Top-up values paid to schools as at July 2020. Of the 237 pupils that were identified as meeting the exceptional band criteria, 185 (78%) are currently in receipt of individual Element 3 Top-up values lower than the £4,300 proposed value.

When setting the proposed value of £4,300 the authority reviewed the average (£3,430), the median (£1,780), mode (£4,130) and maximum (£6,660) values paid to schools for pupils identified as exceptional. Overall the value of £4,300 would provide an additional £27,188 of funding for pupils who are placed on this band (as at July 2020). As stated in the consultation the banding values quoted are the minimum value that will be paid for each band in 2021-22, the final value will come to Schools Forum and Cabinet Member in January 2021 following receipt of the 2021-22 DSG High Needs Block allocation in December 2020.

Under the new EHCP banded funding proposals, schools will still have to make the provision, as specified in the EHCP. This is currently costed on the basis of standardised amounts to ensure equity across schools, rather than actual costs e.g. teaching assistant time is currently costed at the equivalent of £9 per hour.

The new banded funding rates will give schools the flexibility to make decisions as to how best to provide the specified support within the funding band allocated. This flexibility provides schools with greater predictability in terms of the budget available, whilst also allowing for changes that might be necessary across the school year e.g. a child might need a higher level of support initially and then this can be reduced as their develop greater independence skills etc. For those small number of cases where schools identify that additional funds are needed to make the required provision available, the school will be able to apply to the LA for additional resources, as an exceptional arrangement (this is different to the 'Exceptional' band of funding and is for unusual/ one-off situations where additional funds are needed).

This approach is more consistent with the move towards support for children being provided through time-limited interventions rather than having an identified 1-to-1.

In light of the responses, it is not proposed to make any further changes to the new funding model. The final banding values will be agreed by Schools Forum in January 2021 for approval for implementation from 1 April 2021.

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Is your policy/proposal relevant to the following questions?

A1-Crime - Will it make our city safer?



In thinking about this question:

- How will it reduce crime, disorder, ASB and the fear of crime?
- How will it prevent the misuse of drugs, alcohol and other substances?
- How will it protect and support young people at risk of harm?
- How will it discourage re-offending?

If you want more information contact Lisa.Wills@portsmouthcc.gov.uk or go to:

<https://www.portsmouth.gov.uk/ext/documents-external/cou-spp-plan-2018-20.pdf>

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

How will you measure/check the impact of your proposal?

A - Communities and safety

Yes

No

Is your policy/proposal relevant to the following questions?

A2-Housing - Will it provide good quality homes?



In thinking about this question:

- How will it increase good quality affordable housing, including social housing?
- How will it reduce the number of poor quality homes and accommodation?
- How will it produce well-insulated and sustainable buildings?
- How will it provide a mix of housing for different groups and needs?

If you want more information contact Daniel.Young@portsmouthcc.gov.uk or go to:

<https://www.portsmouth.gov.uk/ext/documents-external/psh-providing-affordable-housing-in-portsmouth-april-19.pdf>

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

How are you going to measure/check the impact of your proposal?

A - Communities and safety

Yes

No

Is your policy/proposal relevant to the following questions?

A3-Health - Will this help promote healthy, safe and independent living?

In thinking about this question:

- How will it improve physical and mental health?
- How will it improve quality of life?
- How will it encourage healthy lifestyle choices?
- How will it create healthy places? (Including workplaces)

If you want more information contact Dominique.Letouze@portsmouthcc.gov.uk or go to:

<https://www.portsmouth.gov.uk/ext/documents-external/cons-114.86-health-and-wellbeing-strategy-proof-2.pdf>

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

How are you going to measure/check the impact of your proposal?

| | | |
|-----------------------------------|-----|----|
| A - Communities and safety | Yes | No |
|-----------------------------------|-----|----|

Is your policy/proposal relevant to the following questions?

A4-Income deprivation and poverty-Will it consider income deprivation and reduce poverty?

In thinking about this question:

- How will it support those vulnerable to falling into poverty; e.g., single working age adults and lone parent households?
- How will it consider low-income communities, households and individuals?
- How will it support those unable to work?
- How will it support those with no educational qualifications?

If you want more information contact Mark.Sage@portsmouthcc.gov.uk or go to:

<https://www.portsmouth.gov.uk/ext/documents-external/cou-homelessness-strategy-2018-to-2023.pdf>
<https://www.portsmouth.gov.uk/ext/health-and-care/health/joint-strategic-needs-assessment>

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

How are you going to measure/check the impact of your proposal?

A - Communities and safety

Yes

No

Is your policy/proposal relevant to the following questions?

A5-Equality & diversity - Will it have any positive/negative impacts on the protected characteristics?

In thinking about this question:

- How will it impact on the protected characteristics-Positive or negative impact (Protected characteristics under the Equality Act 2010, Age, disability, race/ethnicity, Sexual orientation, gender reassignment, sex, religion or belief, pregnancy and maternity, marriage and civil partnership,socio-economic)
- What mitigation has been put in place to lessen any impacts or barriers removed?
- How will it help promote equality for a specific protected characteristic?

If you want more information contact gina.perryman@portsmouthcc.gov.uk or go to:

<https://www.portsmouth.gov.uk/ext/documents-external/cmu-equality-strategy-2019-22-final.pdf>

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

This change in the way that funding is allocated to support children with an EHCP will continue to ensure that children with special educational needs and disabilities receive the support that is specified in the EHCP by providing equitable funding to schools based on the child's assessed need.

How are you going to measure/check the impact of your proposal?

An analysis of the impact of this change on the funding provided to schools has been undertaken, as set out below:



B - Environment and climate change

Yes

No

Is your policy/proposal relevant to the following questions?

B1-Carbon emissions - Will it reduce carbon emissions?

In thinking about this question:

- How will it reduce greenhouse gas emissions?
- How will it provide renewable sources of energy?
- How will it reduce the need for motorised vehicle travel?
- How will it encourage and support residents to reduce carbon emissions?

If you want more information contact Tristan.thorn@portsmouthcc.gov.uk or go to:

<https://www.portsmouth.gov.uk/ext/documents-external/cmu-sustainability-strategy.pdf>

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

How are you going to measure/check the impact of your proposal?

B - Environment and climate change

Yes

No

Is your policy/proposal relevant to the following questions?

B2-Energy use - Will it reduce energy use?

In thinking about this question:

- How will it reduce water consumption?
- How will it reduce electricity consumption?
- How will it reduce gas consumption?
- How will it reduce the production of waste?

If you want more information contact Triston.thorn@portsmouthcc.gov.uk or go to:

<https://www.portsmouth.gov.uk/ext/documents-external/pln-portsmouth-plan-post-adoption.pdf>

<https://democracy.portsmouth.gov.uk/documents/s24685/Home%20Energy%20Appendix%201%20-%20Energy%20and%20water%20at%20home%20-%20Strategy%202019-25.pdf>

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

How are you going to measure/check the impact of your proposal?

B - Environment and climate change

Yes

No

Is your policy/proposal relevant to the following questions?

B3 - Climate change mitigation and flooding-Will it proactively mitigate against a changing climate and flooding?

In thinking about this question:

- How will it minimise flood risk from both coastal and surface flooding in the future?
- How will it protect properties and buildings from flooding?
- How will it make local people aware of the risk from flooding?
- How will it mitigate for future changes in temperature and extreme weather events?

If you want more information contact Tristan.thorn@portsmouthcc.gov.uk or go to:

<https://www.portsmouth.gov.uk/ext/documents-external/env-surface-water-management-plan-2019.pdf>

<https://www.portsmouth.gov.uk/ext/documents-external/cou-flood-risk-management-plan.pdf>

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

How are you going to measure/check the impact of your proposal?

B - Environment and climate change

Yes

No

Is your policy/proposal relevant to the following questions?

B4-Natural environment-Will it ensure public spaces are greener, more sustainable and well-maintained?

In thinking about this question:

- How will it encourage biodiversity and protect habitats?
- How will it preserve natural sites?
- How will it conserve and enhance natural species?

If you want more information contact Daniel.Young@portsmouthcc.gov.uk or go to:

<https://www.portsmouth.gov.uk/ext/documents-external/pln-solent-recreation-mitigation-strategy-dec-17.pdf>

<https://www.portsmouth.gov.uk/ext/documents-external/pln-portsmouth-plan-post-adoption.pdf>

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

How are you going to measure/check the impact of your proposal?

B - Environment and climate change

Yes

No

Is your policy/proposal relevant to the following questions?

B5-Air quality - Will it improve air quality?

In thinking about this question:

- How will it reduce motor vehicle traffic congestion?
- How will it reduce emissions of key pollutants?
- How will it discourage the idling of motor vehicles?
- How will it reduce reliance on private car use?

If you want more information contact Hayley.Trower@portsmouthcc.gov.uk or go to:

<https://www.portsmouth.gov.uk/ext/documents-external/env-aq-air-quality-plan-outline-business-case.pdf>

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

How are you going to measure/check the impact of your proposal?

B - Environment and climate change

Yes

No

Is your policy/proposal relevant to the following questions?

B6-Transport - Will it improve road safety and transport for the whole community?

In thinking about this question:

- How will it prioritise pedestrians, cyclists and public transport users over users of private vehicles?
- How will it allocate street space to ensure children and older people can walk and cycle safely in the area?
- How will it increase the proportion of journeys made using sustainable and active transport?
- How will it reduce the risk of traffic collisions, and near misses, with pedestrians and cyclists?

If you want more information contact Pam.Turton@portsmouthcc.gov.uk or go to:

<https://www.portsmouth.gov.uk/ext/travel/local-transport-plan-3>

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

How are you going to measure/check the impact of your proposal?

B - Environment and climate change

Yes

No

Is your policy/proposal relevant to the following questions?

B7-Waste management - Will it increase recycling and reduce the production of waste?

In thinking about this question:

- How will it reduce household waste and consumption?
- How will it increase recycling?
- How will it reduce industrial and construction waste?

If you want more information contact Steven.Russell@portsmouthcc.gov.uk or go to:

<https://documents.hants.gov.uk/mineralsandwaste/HampshireMineralsWastePlanADOPTED.pdf>

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

How are you going to measure/check the impact of your proposal?

C - Regeneration of our city

Yes

No

Is your policy/proposal relevant to the following questions?

C1-Culture and heritage - Will it promote, protect and enhance our culture and heritage?

In thinking about this question:

- How will it protect areas of cultural value?
- How will it protect listed buildings?
- How will it encourage events and attractions?
- How will it make Portsmouth a city people want to live in?

If you want more information contact Claire.Looney@portsmouthcc.gov.uk or go to:

<https://www.portsmouth.gov.uk/ext/documents-external/pln-portsmouth-plan-post-adoption.pdf>

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

How are you going to measure/check the impact of your proposal?

C - Regeneration of our city

Yes

No

Is your policy/proposal relevant to the following questions?

C2-Employment and opportunities - Will it promote the development of a skilled workforce?

In thinking about this question:

- How will it improve qualifications and skills for local people?
- How will it reduce unemployment?
- How will it create high quality jobs?
- How will it improve earnings?

If you want more information contact Mark.Pembleton@portsmouthcc.gov.uk or go to:

<https://www.portsmouth.gov.uk/ext/documents-external/cou-regeneration-strategy.pdf>

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

How are you going to measure/check the impact of your proposal?

Is your policy/proposal relevant to the following questions?

C3 - Economy - Will it encourage businesses to invest in the city, support sustainable growth and regeneration?

In thinking about this question:

- How will it encourage the development of key industries?
- How will it improve the local economy?
- How will it create valuable employment opportunities for local people?
- How will it promote employment and growth in the city?

If you want more information contact Mark.Pembleton@portsmouthcc.gov.uk or go to:

<https://www.portsmouth.gov.uk/ext/documents-external/cou-regeneration-strategy.pdf>

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

How are you going to measure/check the impact of your proposal?

Q8 - Who was involved in the Integrated impact assessment?

Julia Katherine, Head of Inclusion
Alison Egerton, Group Accountant
Mike Stoneman, Deputy Director, Education

This IIA has been approved by:

Contact number:

Date: