

Decision *No change required*

Date *02 January 2025*



# The Proposal

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## 1. What is the Proposal

The Special Educational Needs and Disabilities (SEND) and Alternative Provision Strategy 2025-29 identifies priorities and actions to deliver the best possible outcomes for children and young people with SEND and their families in the City of London.

## 2. What are the recommendations?

The Strategy has five priorities:

1. children and young people with SEND and their families get the right help, at the right time
2. children and young people with SEND and parent carers are supported during transitions, including preparation for adulthood
3. children and young people with SEND and their families are supported and enabled by a skilled, valued workforce
4. children and young people with SEND and their families feel recognised, valued and part of their local community
5. children and young people experience high quality, appropriate alternative provision when needed

**3. Who is affected by the Proposal?** *Identify the main groups most likely to be directly or indirectly affected by the recommendations.*

The strategy is aimed at children and young people with SEND - including those with an Education, Health and Care Plan or SEN Support - aged 0-25 and their families who live in the City of London. The priorities in the strategy are designed to reflect and meet their needs.

**Age - Additional Equalities Data (Service Level or Corporate)**

**What is the proposal's impact on the equalities aim?** *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

Census data from 2021 shows that of the 8,600 population in the City of London, the majority are of working age but 1,975 are 0-25, with 713 of those aged 0-18. At the end of August 2024, there were 26 City of London Children and Young People with an Education, Health and Care Plan (EHCP). With only one maintained school in the City of London (a primary school), City of London children and young people go to 66 different schools in other areas. Amongst these children, 55 were receiving SEN Support in their schools.

[Ageism can be found](#) in many institutions and sectors of society including those providing health and social care, the workplace and the legal system. Young people can be discriminated against because of their age, for example in gaining employment and being paid poor wages, not having the same rights as adults or difficulties in accessing education, health care and social services. Disabled young people can be impacted by this same discrimination but in a more complex way due to their individual needs and barriers put in place by society.

**Key borough statistics:**

Included above.

**What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?**

The strategy's focus on 0-25s will provide a range of priorities and actions that will have a direct positive impact on children and young people with SEND aged 0-25. This includes a focus on the early identification of needs which in younger children can help prevent issues reaching crisis point at they get older.

The strategy will deliver for children and young people with SEND aged 0-25 and will need to:

- drive the delivery of services that ensure children and young people with SEND and their families get the right help at the right time
- bring partners together to co-design inclusive universal services for children and young people with SEND and services that meet parent carers needs
- empower young people with SEND to live the life they choose
- promote opportunities for young people with SEND to access training and employment
- support children and young people with SEND through key transitions, including into adulthood

## Disability - Additional Equalities Data (Service Level or Corporate)

**What is the proposal’s impact on the equalities aim?** *Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact*

At the end of June 2024, there were 26 City of London Children and Young People with an Education, Health and Care Plan (EHCP). 55 City of London children and young people were receiving SEN Support in their schools.

SEND is the main focus on the strategy and the priorities have been developed with children and young people with SEND as well as parent carers. It will have a positive impact on children and young people with SEND.

The Strategy is focused on supporting and improving choice and outcomes for children and young people with SEND so will have a positive impact on this protected characteristic.

Some of issues and barriers faced by disabled people include:

[The disability employment gap](#) is the difference in the employment rate of disabled people and people who are not disabled. It stands around 29 percentage points. The disability pay gap demonstrates that disabled people are paid less, on average, than non-disabled people, in 2021 this was 13.8%.

[Disabled young people](#) are less likely than their non-disabled peers to not be in education, employment or training and disabled young people (age 16-24) had one of the lowest median hourly earnings compared to non-disabled people.

[Disabled young people](#) are more likely to experience downward social mobility compared to their non-disabled peers. This means they’re more likely to hold jobs with worse conditions and pay than their parents.

**What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?**

No negative impact on children and young people with SEND, and their families, has been identified. The strategy aims to tackle some of the barriers they face and create more inclusive communities within the City of London. This is reflected in the priorities:

- children and young people with SEND and their families get the right help, at the right time
- children and young people with SEND and parent carers are supported during transitions, including preparation for adulthood
- children and young people with SEND and their families are supported and enabled by a skilled, valued workforce
- children and young people with SEND and their families feel recognised, valued and part of their local community
- children and young people experience high quality, appropriate alternative provision when needed

<p><a href="#">Social factors</a> including low expectations and experiences of bullying can create barriers to higher education for young people with disabilities. A significant group of young people with disabilities enter secondary education with poorer academic results than non-disabled peers, and never catch-up.</p> <p><a href="#">Life costs more if you're disabled</a>. On average, disabled households (with at least one disabled adult or child) need an additional £975 a month to have the same standard of living as non-disabled households. The costs rises if there are more disabled people in the household. <a href="#">Poverty rates</a> are higher among families where at least one member is disabled.</p> <p><a href="#">Disabled people</a> (16-64), on average, have poorer ratings of personal well-being than non-disabled people. The greatest disparity is in average levels of anxiety experienced. Disabled people reported lower levels of well-being than non-disabled people throughout all stages of the Covid-19 pandemic.</p> <p><a href="#">Multiple individual characteristics</a> and societal factors intersect to compound discrimination in any given context. Therefore, disability intersects with other identity factors such as those listed in this document.</p>	
<p><b>Key borough statistics:</b></p> <p>Included above.</p>	

# Gender Reassignment

Check this box if NOT applicable

## Gender Reassignment - Additional Equalities Data (Service Level or Corporate)

**What is the proposal's impact on the equalities aim?** *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

92.1% of the City of London population that completed the Census 2021 stated their gender as being the same as their sex registered at birth. 7.4% of respondents did not provide an answer to the question around gender identity. 0.4% identified as either gender identify different from sex registered at birth but no specific identify given, trans woman, trans man or non-binary.

Due to lack of further data, we conclude that there is a neutral impact of the proposals on this protected characteristic.

### Key borough statistics:

Included above.

**What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?**

The priorities and actions in the strategy will be available and accessible to all children and young people with SEND so it is expected that there will be a neutral impact on this protected characteristic.

Data will be kept under review to monitor any emerging specific needs within this protected characteristic group.

# Pregnancy and Maternity

Check this box if NOT applicable

## Pregnancy and Maternity - Additional Equalities Data (Service Level or Corporate)

**What is the proposal's impact on the equalities aim?** *Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact*

Under the theme of population, the [ONS website](#) has a large number of data collections grouped under:

- [Contraception and Fertility Rates](#)
- [Live Births](#)

City of London has been grouped with Hackney for live birth data after 2004. The strategy focuses on the early identification of need and providing support to meet that need. It considers support for parent carers and covers the Early Years.

Some issues faced by parent carers can include:

[Postnatal depression](#) can affect more than 1 in every 10 women within a year of giving birth. It can also affect fathers and partners.

[Getting a diagnosis](#) for a child, whatever age including during pregnancy and the early years, can be stressful and cause worry and anxiety for parents.

[The birth mother's](#) nutritional and mental health significantly influences the child's long-term growth and wellness.

### Key borough statistics:

Included above.

**What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?**

There is no negative impact identified relating to this protected characteristic. The strategy aims to advance equality and equity in the delivery of services. It aims to respond to engagement with parent carers by co-designing services and support with them to meet their needs, actions include:

- co-designing the support offer for parent carers to better reflect and meet their needs during key transitions
- working with parent carers to review and develop the emotional wellbeing offer for them
- strengthening the information, advice and support offer for families including reviewing the Local Offer in partnership with the City Parent Carer Forum

**Race - Additional Equalities Data (Service Level or Corporate)**

**What is the proposal's impact on the equalities aim?** *Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact*

Our resident population is predominantly white. The largest minority ethnic groups of children and young people in the area are Asian/Bangladeshi and Mixed – Asian and White. The City of London has a relatively small Black population, less than London and England and Wales. Children and young people from global majority groups account for 41.71% of all children living in the area, compared with 21.11% nationally. White British residents comprise 57.5% of the total population, followed by White-Other at 19%.

National research suggests that [children of ethnic minority groups](#) (global majority) are over-represented for some types of Special Education Needs and under-represented in others compared to White British pupils.

[Research by the Disabled Children's Partnership](#) (DCP - a national charities coalition) highlights that the experiences of families from global majority backgrounds with disabled children in accessing children's social care is an under-researched area. But through its own research, DCP highlights that in common with other families with disabled children, families from global majority backgrounds 'face significant barriers in accessing the support they need, due to high thresholds, a lack of services, poor understanding on their needs and a system focused on protection rather than support. However, families from BAME (global majority) backgrounds faced significant additional barriers due to their ethnicity.'

**Key borough statistics:**

Included above.

**What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?**

The strategy aims to foster equity, inclusion and equal opportunities for all children and young people. Services and support are based on need, not race, so therefore, it is likely that there will be a positive indirect impact on children, young people and families from all ethnic backgrounds.

However, this will need to be monitored related to the success measure of ensuring equity across different communities under the priority around children and young people with SEND getting the right help at the right time.



# Religion or Belief

Check this box if NOT applicable

## Religion or Belief - Additional Equalities Data (Service Level or Corporate)

**What is the proposal's impact on the equalities aim?** *Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact*

Census 2021 data shows that amongst City of London residents, 43.8% had no religion, 34.7% were Christian and 6.3% were Muslim. These were the biggest groups in the census with other religions making up the remainder of the population.

Census 2021 data also shows that people who describe their religion and 'other religion' had the highest proportion of disabled people (30.2% in England).

There is limited information available on the interaction of religion and belief with SEND.

### Key borough statistics – sources include:

Included above.

**What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?**

It is expected that a focus in the strategy on equity, inclusion and equality of opportunity for children and young people with SEND will have an indirect positive impact on this protected group.

Religion or belief will need to be considered in relation to any specific initiatives or services that may develop from the action plan.

**Sex - Additional Equalities Data (Service Level or Corporate)**

**What is the proposal’s impact on the equalities aim?** *Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact*

[Census 2021 data](#) shows that:

- In England, 18.7% of females and 16.5% of males were disabled in 2021.
- In those aged under 15 years, a higher percentage of males were disabled compared to females.
- The percentage of disabled females increased notably between the ages of 10 to 14 years and 15-19 years between 2011 and 2021 – rising from 6.8% to 12.2%.

The Census 2021 also showed that the City of London population comprised of 4,800 males and 3,800 females (56% and 44% respectively)

National research on the [gender gap in autism](#) found that on average between three and four times more often in boys compared to girls. Girls on average tend to be diagnosed 1.8 years later than boys, and it can take longer for them to get a diagnosis after parents or teachers first raise concerns. In other words, autistic girls are more likely to be ‘missed’ until later in life – even until adulthood.

**Key borough statistics:**

Included above.

**What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?**

The Strategy relates to all children regardless of sex so it is likely there will be an indirect positive impact on this characteristic.

Sex will need to be considered in relation to any specific initiatives or services that may develop from the action plan, e.g. targeting girls, and kept under review in terms of impact.

# Sexual Orientation

Check this box if NOT applicable

## Sexual Orientation - Additional Equalities Data (Service Level or Corporate)

**What is the proposal's impact on the equalities aim?** *Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact*

Census 2021 national data found that the percentage of disabled people (16+) who identified as lesbian, gay, bisexual or another minority sexual orientation referred to in the Census reporting as LBG+ (6.4% in England) was greater than that of non-disabled people (2.6% in England). The difference in sexual orientation between disabled and non-disabled people was primarily driven by the higher proportion of young disabled females reporting being LBG+ (7.4% in England).

Data from the Census 2021 for the City of London showed:

- 79.28% of City residents that undertook the census 2021 identified as heterosexual or straight.
- 7.58% identified as gay or lesbian
- 2.31% identified as bisexual
- 0.29% identified as pansexual
- 0.06% identified as asexual
- 0.10% identified as queer
- 0.01% identified as all other sexual orientations
  
- 10.37% did not answer.

Data is not available for children and young people.

**What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?**

The priorities and actions in the strategy will be available and accessible to all children and young people with SEND so it is expected that there will be a neutral impact on this protected characteristic.

Data will be kept under review to monitor any emerging specific needs within this protected characteristic group and sexual orientation will need to be considered in relation to any specific initiatives or services that may develop from the action plan.

**Key borough statistics:**

Included above.

## Marriage and Civil Partnership

Check this box if NOT applicable

### Marriage and Civil Partnership - Additional Equalities Data (Service Level or Corporate)

**What is the proposal's impact on the equalities aim?** *Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact*

Census 2021 national data found that a third of disabled adults were married (34.2% in England) compared with just under half of non-disabled people (47.1% in England); the percentage of disabled people who had never married, separated, been widowed or divorced was higher compared with non-disabled people.

Life can be challenging for parents of children with SEND. [Research](#) has shown that couples raising disabled children are more likely to separate than parents with non-disabled children. Various factors can put a strain on relations such as the intense schedule of care and frequent hospital visits and financial pressure.

**Key borough statistics – sources include:**

- [The 2011 Census contain data broken up by local authority on marital and civil partnership status](#)

**What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?**

The Strategy doesn't focus on the relationship status of parent carers of children and young people with SEND but by providing support in response to need, it is likely that it will have an indirect positive impact on this characteristic.

Under the priority 'children and young people with SEND and their families get the right help, at the right time', actions include:

- Continuing to identify children and young people's needs early and providing the right support.
- Working with parent carers to review and develop the emotional wellbeing offer for them.
- Strengthening the information, advice and support offer for families.

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposal.

# Additional Impacts on Advancing Equality and Fostering Good Relations

Check this box if NOT applicable X

## Additional Equalities Data (Service Level or Corporate)

**Are there any additional benefits or risks of the proposals on advancing equality and fostering good relations not considered above?**

None.

**What actions can be taken to avoid or mitigate any negative impact on advancing equality or fostering good relations not considered above?** Provide details of how effective the mitigation will be and how it will be monitored.

# Additional Impacts on Social Mobility

Check this box if NOT applicable

## Additional Social Mobility Data (Service level or Corporate)

### Are there any additional benefits or risks of the proposals on advancing Social Mobility?

Drivers of social mobility include factors like childhood conditions, such as education and occupation level of your parents, and work opportunities for young people. Furthermore, [analysis by the Social Mobility Commission](#) states that people with a disability do significantly worse across all outcomes. In some cases, the gap is even wider among those from a 'lower working-class background', suggesting that professional families are better able to mitigate the effects of disability on young people's life chances.

A priority in the strategy is children and young people with SEND and parent carers are supported during transitions. Within this, actions that link to promoting social mobility include:

- Reviewing and strengthening support and information for families during times of transition.
- Working in partnership to raise awareness of apprenticeships and supported internships, supporting young people with SEND through the application process.

### What actions can be taken to avoid or mitigate any negative impact on advancing Social Mobility not considered above?

Provide details of how effective the mitigation will be and how it will be monitored.

None.

# Conclusion and Reporting Guidance

**This analysis has concluded that ...**

**Outcome of analysis** – check the one that applies

**Outcome 1**

No change required where the assessment has not identified any potential for discrimination or adverse impact and all opportunities to advance equality have been taken.

**Outcome 2**

Adjustments to remove barriers identified by the assessment or to better advance equality. Are you satisfied that the proposed adjustment will remove the barriers identified.

**Outcome 3**

Continue despite having identified some potential adverse impacts or missed opportunities to advance equality. In this case, the justification should be included in the assessment and should be in line with the duty to have 'due regard'. For the most important relevant policies, compelling reasons will be needed. You should consider whether there are sufficient plans to reduce the negative impact and/or plans to monitor the actual impact.

**Outcome 4**

Stop and rethink when an assessment shows actual or potential unlawful discrimination.

Signed off by Director: *Assistant Director Partnerships and Commissioning*

Name: *Simon Cribbens*

Date *02 January 2025*