SSA EQUALITY IMPACT AND NEEDS ANALYSIS

Directorate	Children's Services
Service Area	Education
Service/policy/function being assessed	Proposed closure of Bradstow (Kent) Community
	Special School and Children's Homes
Which borough (s) does the service/policy apply to	Wandsworth
Staff involved in developing this EINA	Elaine Smith, Bill Sinnott, Emma Maffre, Tiffany Elliott, Katie Thornton, Gwen Sinnott, Deborah Johnson
Date approved by Policy and Review Manager	Jamie Fisher 21/08/25
All EINAs must be signed off by the Policy and Review	Head of Policy and Strategy
Manager	
Date submitted to Directors' Board	This EINA has been updated post informal
	consultation and included as part of all paperwork
	for the formal consultation

1. Summary

After careful consideration Wandsworth Council has made the decision to commence the statutory consultation process on the discontinuance (closure) of Bradstow School, a community special school, with the associated closure of the children's homes. The school is located in the coastal town of Broadstairs in Kent, providing education and accommodation to young people with severe learning disabilities who are on the autistic spectrum continuum.

If the decision to close the school is made, Wandsworth council will prioritise the needs and welfare of its children and are committed to working with school leaders to ensure other placing local authorities engage with their families to put in place suitable alternative provision and plan a smooth transition for their children.

The school has successfully played a vital role in supporting children with complex learning needs and autism since 1990, when it was inherited by Wandsworth following the abolition of the Inner London Education Authority (ILEA).

Community special schools providing accommodation to young people for more than 295 days per year are required to register as children's homes. These are inspected under the 2015 Children's Homes Regulations. For this reason, Bradstow was registered as a children's home in 2014.

As a community special school, with children's homes, Bradstow currently provides accommodation for up to 30 children during term time (who return to their families and carers during the school holidays), with an additional capacity of 32 places for day-only pupils.

Historically approximately 40% of pupils placed at the school are Kent County Council pupils. From the October School Census 2024 data, 13 of the 32 children placed at Bradstow were from Kent. 4 of the children were from Wandsworth (1 of whom ended their school journey in summer 2025).

Of the 32 children placed at Bradstow as at the October census, 28 were on 38-week placements with 4 children on day-only placements.

As of July 2025, the cohort of children at Bradstow has reduced to 13, with 77% placed equally by Kent, Medway, Newham, Havering and Wandsworth, and a further 3 local authorities, Barking and Dagenham, Hillingdon and Richmond with a single placement.

Wandsworth Council is committed to supporting children with Special Educational Needs and Disabilities (SEND) locally, keeping them educated and cared for within Wandsworth or as close to their homes as possible. The council has invested £41m in expanding SEND provision in Wandsworth creating over 271 places since 2021, of which £34m is on a purpose-built expansion of Paddock Secondary and Sixth Form School to improve our local provision for children with complex special educational needs linked to their diagnosis of Autism and severe learning disability. A primary aim for the development of Paddock School is to enable Wandsworth children to remain in their local community to allow them to successfully retain their close links to family and friends, which can be lost if they are placed at a significant distance from home. Although this may not benefit the Wandsworth children currently placed at Bradstow, lack of local sufficiency has historically meant that we have needed to place at Bradstow, and so this investment is part of our future planning for children who present with similar needs to keep them local.

Wandsworth Council has explored a number of options to avoid closure including working with Kent County Council since November 2021, to explore the potential for transferring the provision to Kent County Council. However, Kent County Council decided not to proceed with a transfer and so this, combined with significant financial pressures facing the school, left no other viable option at this time but to consult on closure.

There is a statutory process to be followed when proposing the closure of a school. The process requires consultation of such persons the Council considers appropriate (an informal phase) and then publication of formal proposals, which is a four-week period for comments and objections. The Cabinet then decides whether to approve the proposals. The 'informal' consultation commenced on 6 January 2025 and concluded on 16 February 2025. A decision was made by the Cabinet Member for Children's to delay the decision to move to the formal consultation until after 24 March 2025 following discussions held at Wandsworth Children's Overview and Scrutiny committee on 11 February to allow governors the opportunity to explore academisation as an alternative to closure.

Despite fully supporting this process, we were notified 29 July 2025 that the Department for Education (DfE) was not able to approve the application with Cygnus Academy Trust. Given this academisation application decision, and the impact of falling pupil numbers, which has worsened the school's financial position, added to the aged debt the school already holds, Wandsworth has now taken the difficult decision to re-instate the statutory process and formally consult on closure.

Given the nature of proposals, there will be an impact on the protected characteristics of age, sex, disability, ethnicity, and religion, with the EINA highlighting the nature of these impacts in detail. We are committed, through the consultation stage, to listening to and acting on the views and concerns of those affected, and to providing the details and reassurance to mitigate the risk of any adverse impacts the closure of the school may incur.

This EINA has been updated following the findings of the pre-publication consultation and to reflect the current cohort of children attending the school which has significantly reduced from 32 in January 2025, to 13 in July 2025.

This EINA has found that the proposed closure of the school would affect current pupils at the school, of which there were 13 as at July 2025. All children are in receipt of an EHCP, with Autism Spectrum Disorder as their SEN Primary Need. The closure would have the most impact on those pupils of secondary school age, and particular in the age group 16-19. The cohort of children most affected are predominantly male and from a Black or Black British ethnic background and live in the 20-40% most deprived areas in England IDACI Band 2.

The proposal is subject to further statutory consultation, and this EINA will be updated with any additional findings from this.

2. Evidence gathering and engagement

a. What evidence has been used for this assessment? For example, national data, local data via DataRich or DataWand.

Pupil statistics are sourced from the Statutory Department for Education School Census which was last conducted in May 2025. Any data relating to pupil Ethnicity or Primary SEN Need, for Kent, London and National figures are based on January 2025 Census as this was the most recent data published for comparison.

Evidence	Source
Age	School Census May 2025
Disability	School Census May 2025
Sex	School Census January 2025 for breakdown by SEN
	Primary need
	School Census May 2025
Race/ethnicity	School Census May 2025
Free School Meals Eligibility	School Census May 2025
IDACI Band	School Census Jan 2025

b. Who have you engaged and consulted with as part of your assessment?

The proposal will be subject to a 6-week pre-publication consultation period followed by the commencement of the formal stage of the statutorily regulated process to close (discontinue) a school. This EINA has been updated following comments received as part of the pre-publication consultation.

3. Analysis of need

Potential impact on this group of residents and actions taken to mitigate impact and advance equality, diversity and inclusion

Bradstow is a special school, and its population is not necessarily reflective of its local geographical community given that children attend from many different LAs. As of July 2025, the 13 children attending Bradstow come from 8 different LAs, from London and the South-East.

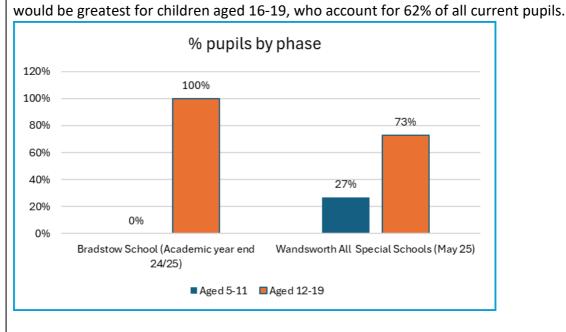
It is important to note that admissions to any special schools (which are non-denominational) is done in line with the SEND code of practice, and consideration of how protective characteristics could impact future placement must be viewed in this context. All allocation would be consider based on the assessed special educational need as outlined in their EHCP, rather than protected characteristics.

Protected group Age The school has the capacity to provide 62 educational places for pupils aged 5 to 19. At the end of the academic year 24/25, the school has 13 children aged 12 to 19 on roll. Bradstow School has a higher proportion of pupils who are of secondary school age, in National Curriculum Year Groups 7 or higher (100%) compared to all Wandsworth special schools (73%).

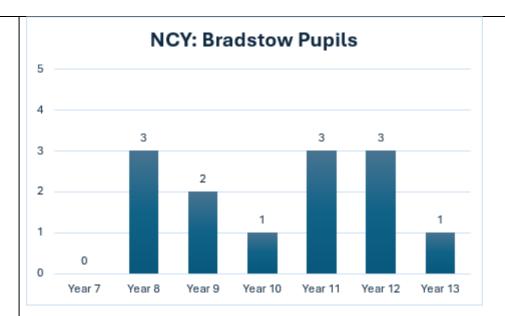
slight shift in age demographic over the course of the school year.

The impact of the potential closure of Bradstow school at the end of the Autumn term 2025/26

In January 25, Bradstow had 32 children aged 5 to 19, of whom 91% were aged 12-19, showing a



Number of pupils at Bradstow as at end of academic year 24/25:



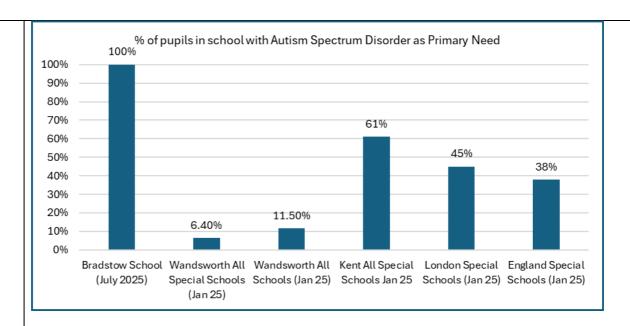
There are 7 children who would be in post 16 classes in the new academic year showing that the greatest impact is for children post 16.

Disability

This provision is a Community Special School where all children on roll will have an EHCP. The proportion of children with an EHCP in all Wandsworth schools was 7.7% in May 2025 as a comparison. Therefore, children with SEND are impacted more in this closure because of its school type.

All children attending Bradstow at the end of July 2025 are on the autistic continuum. The SEN Primary Need of pupils is not collected in the May school census, but data from the January 2025 school census showed that all Bradstow pupils (then 29 - 100%) had an SEN Primary Need of Autism Spectrum Disorder, compared to 6% for all Wandsworth special schools.

SEN Primary	Bradstow	Wandsworth	Wandsworth	Kent All	London	England
Need	School	All Special	All Schools	Special	Special	Special
	(July	Schools (Jan	(Jan 25)	Schools	Schools	Schools
	2025)	25)			(Jan 25)	(Jan 25)
% of pupils in school with Autism Spectrum Disorder as SEN Primary Need	100%	6.4%	11.5%	61%	45%	38%
Total number of pupils in school	13	905	32,003	6473	23028	164492



The impact of the potential closure of Bradstow at the end of the Autumn term 2025/26 would therefore be greatest for children with an Education Health and Care Plan where the SEN Primary Need is Autism Spectrum Disorder, as 100% of Bradstow pupils have an EHCP in July 2025, and 100% of pupils have an SEN Primary Need of ASD.

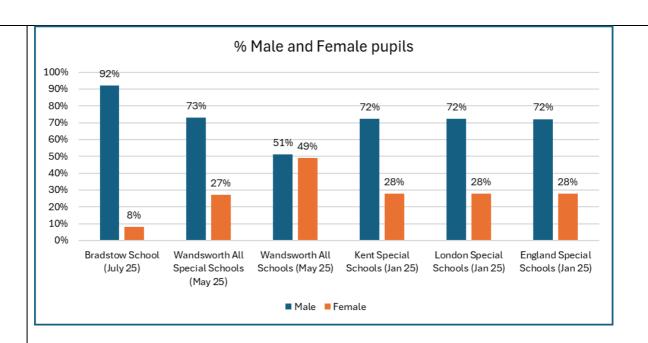
Sex

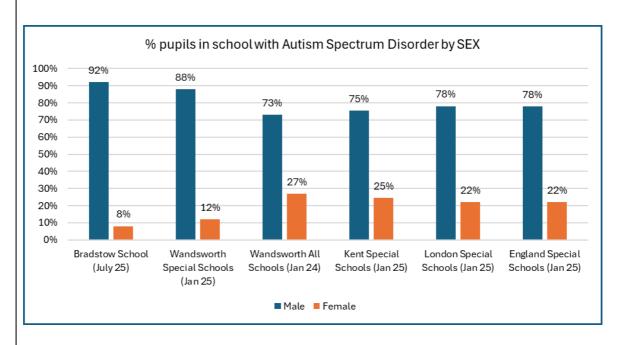
Of the 13 pupils in Bradstow at the end of the 24/25 academic year using school data, 92% were male and 8% were female. This compares to 73% male and 27% female for all Wandsworth Special Schools and compares to 51% male and 49% female for all Wandsworth school pupils.

100% of the 13 Bradstow school pupils have a SEN primary need of Autistic Spectrum Disorder, which has a higher prevalence for males. When considering sex with the SEN primary need of ASD, as of July 25, 92% of the cohort at Bradstow are male, compared to 83% male for Wandsworth special schools and 74% male for all Wandsworth schools

The impact of the potential closure of Bradstow school at the end of the Autumn term 2025/26 would therefore have the greatest impact on male pupils.

Bradstow is a co-educational school. School places are allocated using the statutory admissions criteria outlined in the SEND Code of Practice (2015) without reference to sex. All admissions into specialist provision are based on the special educational needs of the individual child or young person and the identified school's ability to meet those needs.

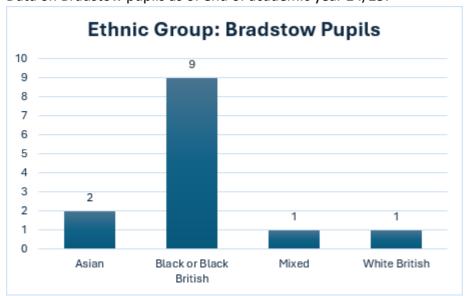




Gender reassignment	N/A
Marriage and civil partnership	N/A
Pregnancy and maternity	N/A
Race/ethnicity	In January 2025, the ethnic breakdown of pupils at Bradstow School were 48% White, 31% Black, 10% Mixed, 10% Asian. This compares to 39% White for all Wandsworth special schools, 36% White for all London special schools and 73% White for all England special schools. Other comparisons for all Wandsworth special schools, London special schools and England special schools are shown in the table below.

		Wandsworth	Wandsw	Kenth All	London	England
	Bradsto	Special	orth All	Special	Special	Special
	w (Jan	Schools (Jan	Schools	Schools	Schools	Schools
Ethnic Breakdowns	25)	25)	(Jan 25)	(Jan 25)	(Jan 25)	(Jan 25)
Asian or Asian British	10%	15%	18%	3%	19%	11%
Black or Black British	31%	26%	19%	3%	25%	7%
Mixed	10%	17%	16%	6%	14%	7%
Other		4%	5%	1%	6%	2%
White & White British	48%	39%	42%	87%	36%	73%
All Global Majority Ethnic						
(Asian, Chinese, Black,	52 %	61%	58%	13%	64%	27%
Mixed and Other)						

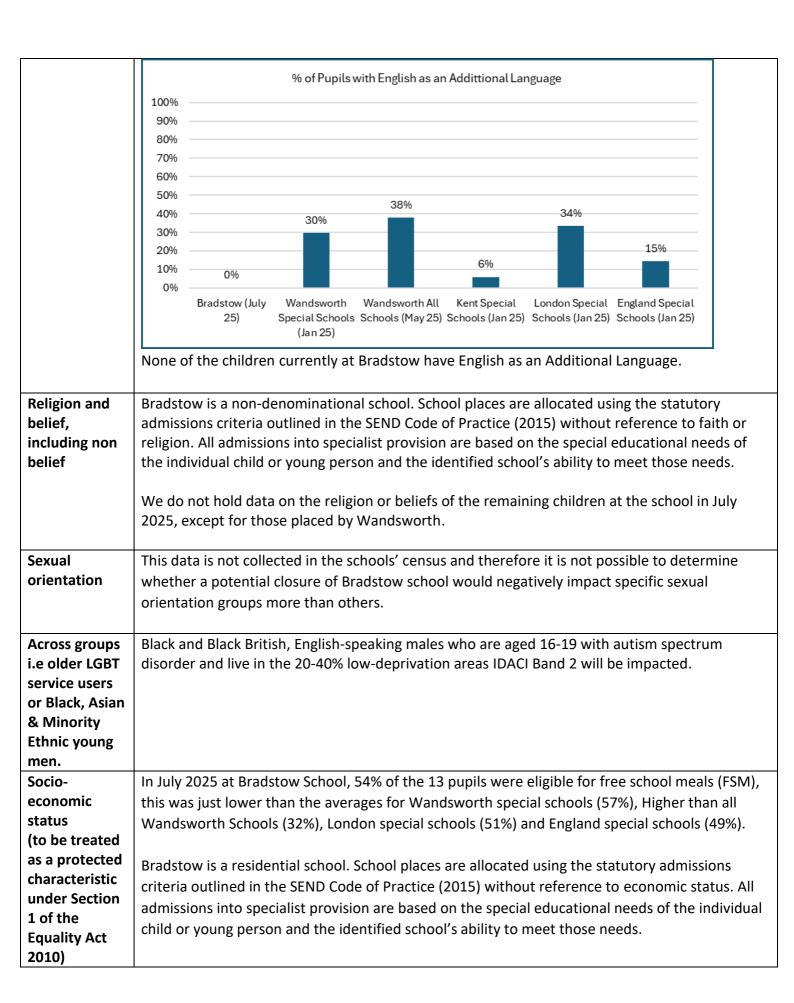
Data on Bradstow pupils as of end of academic year 24/25:



As of the end of the academic year 24/25, the ethnic breakdown of pupils has changed to where the majority of pupils are Black or Black British (69%), with now only 1 pupil (8%) with a White British background compared to 48% in January 2025.

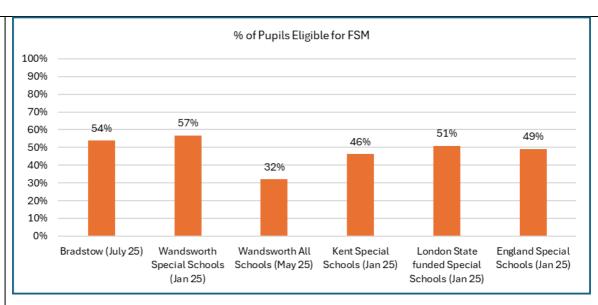
The potential closure of Bradstow school at the end of the Autumn term 2025/26 could therefore have the greatest impact on Black ethnic groups.

Admissions to any special schools (which are non-denominational) isn't considered on the grounds of race or ethnicity, but in line with the SEND code of practice, and hence although those from a black ethnic group are most impacted by potential closure their ethnicity would not impact future placement as allocation would be consider based on special educational need as outlined in their EHCP.



Include the following groups:

- Deprivation
 (measure d by the 2019 English Indices of Deprivation)
- Lowincome groups & employme nt
- Carers
- Care experienc ed people
- Single parents
- Health inequalitie
- Refugee status



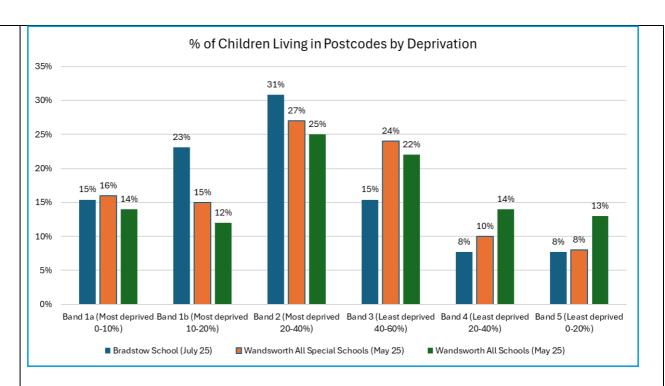
The Council also uses Income Deprivation Affecting Children index (IDACI) data as an indicator of deprivation based on pupils' home postcodes. This is categorised by IDACI bandings where Band 1 includes the top 20% most deprived areas in England (further broken down by Band 1a for top 10%).

38% of pupils attending Bradstow in July 2025 were living in the top 20% most deprived areas of England (IDACI Bandings 1a and 1b). This is higher than the average of 31% for Wandsworth special school pupils and well above 26% for all Wandsworth school pupils using May census data.

45% of pupils attending Bradstow in July 2025, were living in the mid-deprivation areas of England (20-60% least deprived, IDACI Banding 2 and 3). This compares to 51% for all Wandsworth special school pupils and 47% for all Wandsworth school pupils (May 25).

There is no regional or national comparison data available on this measure.

This data suggests that the potential closure of Bradstow school at the end of the Autumn term 2025/26 would have a greater impact on families living in the most deprived 20-40% areas in England, IDACI Band 2. Please note that numbers in different groups are small as there are only 13 children in the Bradstow cohort.



Care Experienced

We do not hold current data for the non-Wandsworth children at Bradstow, although none are in the care of Wandsworth.

Health Inequalities

All of the pupils at Bradstow have an Educational, Health and Care Plan.

Refugee status

The school advised in December 2024 that there were no pupils with refugee status. As no new placements have been agreed during the period December 2024 – July 2025, this information remains unchanged.

Data gaps

Data gap(s)	How will this be addressed?
N/A	

4. Impact

Protected group	Positive	Negative
Age		The impact of the potential closure of
		Bradstow school at the end of the Autumn
		term 2025/26 would be greatest for
		children of secondary school age and
		particularly post 16, who make up over half
		of the remaining school population in July

2025. Typically, few placements are made at Bradstow for younger aged children with their needs able to be met in their own local authority maintained provision for ASD and SLD. However, potentially maintaining this type of placement is more difficult as the child progressing through their educational journey, hence the greater number of 12-19 year olds. To mitigate this, we have invested in early intervention and our inclusion advisory services to support our Wandsworth schools to manage increasing complexity of need reducing the requirement for places at Bradstow over time

Closure would disproportionately affect learners at key transition stages, requiring personalised planning to protect curriculum continuity and preparation for adulthood outcomes.

Mitigation would include ensuring that transition planning addresses not only pupils' EHCP needs but also their educational stage. This would involve liaison with receiving schools or colleges to protect curriculum pathways, accreditation routes, and preparation for adulthood programmes, with personalised support for each student and their family.

Any school closure resulting in the need for a child to change school will be disruptive to their education. However, to mitigate this impact placing local authorities will work with parents/carers and the school to review individualized needs and identify suitable alternative provision and if appropriate, settings which cater for their needs post-19. This would avoid the need for future placement changes at 19 which is when children placed at Bradstow would ordinarily transition. The review would also consider positive learning opportunities.

Disability

The impact of the potential closure of Bradstow school at the end of the Autumn term 2025/26 would be greatest for children with an Education Health and Care Plan (EHCP) where the SEN Primary Need is Autism Spectrum Disorder (ASD), as 100% of Bradstow pupils have an EHCP as at July 2025 and all of those SEN Primary Need of ASD.

Any school closure resulting in the need for a child to change school will be disruptive to their education, with that potential impact increasing for children with SEND. We acknowledge finding appropriate alternative provision for this group of children may be challenging, but to mitigate against this Wandsworth has undertaken an exercise to match the needs of its children placed at Bradstow with provision type, in order to progress placement consultations in line with parental preference if requested to do so, or if the need arises further to a decision being made on this proposal. Transition planning meetings have now taken place for 2 pupils, with families and receiving schools involved. These meetings ensure detailed knowledge transfer, early relationship-building, and personalised planning around EHCP outcomes. Only 1 child from Wandsworth remains in Bradstow from September 2025, with it being parental choice to remain, although a confirmed alternative offer has been secured.

To realise Wandsworth's collective ambition to give children the best care and keep children local to their family, friends and community wherever possible, the council has invested £41m in expanding SEND provision in Wandsworth creating over 271 places since 2021, of which £34m is on a purpose-built expansion of Paddock Secondary and Sixth Form School to improve our local provision for children with complex special educational needs

linked to their diagnosis of Autism and severe learning disability. A primary aim for the development of Paddock School is to enable Wandsworth children to remain in their local community and successfully retain their close links to family and friends which can be lost if they are placed at a significant distance from home. Although this may not benefit the Wandsworth children currently placed at Bradstow, lack of local sufficiency has historically meant that we have needed to place at Bradstow, and so this investment is part of our future planning for children who present with similar needs to keep them local. This change in strategy has led to fewer placements for Wandsworth residents at Bradstow over recent years.

As outlined in Kent County Councils SEND strategy 2025- 2028, Kent have developed a SEND sufficiency strategy with current priorities including reviewing their special school offer to ensure it is appropriate to meet the needs of the most complex pupils through updating school designations. The 24 Kent Special Schools will have one of three designations with supporting admissions guidance, being Complex Learning needs - Profound, Complex Severe. Social, Emotional and Mental Health needs Neurodivergent with Learning Difficulties, all these designations can expect to admit children with Autism.

It has been the recommendation to all other placing local authorities to parallel plan with families and commence the consultation process for alternative provision. This will ensure that if the proposal to close is approved, responsible individuals in placing local authorities will have sufficient time to work with families and the staff at Bradstow school to support pupils to integrate smoothly into their new setting.

Gender reassignment Marriage and	N/A N/A	N/A N/A
Sex		The impact of the potential closure of Bradstow school at the end of the Autumn term 2025/26 would have the greatest impact on male pupils who make up 92% of the school's population as of July 2025. This is because Bradstow school is predominantly for pupils with an SEN primary need of Autistic Spectrum Disorder, which has a higher prevalence for males. As a result of this trend for males being the predominant group who have Autism, all schools nationally cater for, and accept, this dominant feature.
		The consultation process will prioritise transparency and inclusivity, giving families, staff, and community members ample opportunity to feedback. This process will allow Wandsworth Council to carefully assess options and plan a phased transition that ensures continuity of care for children for whom we are responsible, with the intention to work closely with other placing authorities to support their families and children as they transition on.
		Since we commenced the pre-publication consultation process in January 25, 19 children have moved from the school, indicating that there is sufficient suitable alternative provision to meet the special educational needs of the cohort of children attending Bradstow school. This supports the findings of an exercise undertaken by Wandsworth's Assistant Director of SEND and Inclusion at the beginning of the year to map provision in, or near, the local authorities with children remaining at Bradstow.

Race/ethnicity	N/A	The potential closure of Bradstow school at the end of the Autumn term 2025/26 would have the greatest impact on Black or Black British ethnic groups who make up 69% of the school's population at the end of the academic year 2024/25. Admissions to any special schools (which are non-denominational) isn't considered on the grounds of race or ethnicity, but in line with the SEND Code of Practice, and hence although those from a Black and Black British ethnic group are most impacted by potential closure their ethnicity would not impact future placement as allocation would be consider based on special educational need as outlined in their EHCP.
Religion and belief, including non belief	N/A	Although we do not hold data on religion and belief for non-Wandsworth children currently placed at Bradstow, admissions to special schools (which are non-denominational) isn't considered on the grounds of religion or belief, but in line with the SEND code of practice, and hence religion or belief would not impact future placement as allocation would be consider based on special educational need as outlined in their EHCP.
Sexual	N/A	N/A
orientation		
Socio-economic	The admission criteria for Bradstow school	The potential closure of Bradstow school at
status	follows the process outlined in the SEND	the end of the Autumn term 2025/26
(to be treated as	Code of Practice (2015) and the legislation in	would have a greater impact on families
a protected	the Children's and Families Act (2014).	who are eligible for free school meals, who
characteristic	Placements are made based on the special	make up 54% of the school's population at
under Section 1	educational needs outlined in individual	the end of the academic year 2024/25.
of the Equality	Education, Health and Care Plans (EHCP) and	
Act 2010)	if the specialist provision confirms they are	The potential closure of Bradstow school at
Include the	able to meet these needs.	the end of the Autumn term 2025/26
following		would have a greater impact on families
groups:	To realise our collected ambition to give	living in the 20 – 40% most deprived areas,
• Deprivation	children the best care and keep children	IDACI Band 2, who make up 31% of the
(measured	local to their family, friends and community	school's population. Although worth noting
by the 2019	wherever possible, we have invested in and	that numbers in different groups are small
English	developed local maintained provision and	as there are only 13 children in the
1	expanded our local special schools in	Bradstow cohort.

Indices of Deprivation)

- Low-income groups & employment
- Carers
- Care experienced people
- Single parents
- Health inequalities
- Refugee status

Wandsworth. This has meant that we have sufficient alternative schools locally and have required fewer placements in Bradstow over the years.

An individual's socio-economic status often affects their ability to travel. However, transportation for children and young people with EHCPs is clearly outlined in Section 9.214 of the SEND Code of Practice (2015). If the decision is made to close Bradstow school and alternative educational provision is determined through this process, the local SEND Transport team would be able to identify if transport would be provided based on the Government guidance on eligibility. Wandsworth is committed to ensuring children and young people for whom we are responsible are educated in their community, where possible, to avoid long travel journeys which can be very stressful for individuals.

The consultation process will prioritise transparency and inclusivity, giving families, staff, and community members ample opportunity to feedback. This process will allow Wandsworth Council to carefully assess options and plan a phased transition that ensures continuity of care, with hopes to work closely with other placing local authorities and relevant bodies to support each family and child as they transition on.

Therefore, the proposal could potentially negatively affect these vulnerable groups of children as their care during term times will revert to their family, or their local social care team.

If a suitable 38-week placement cannot be identified, families will be supported by their local social care team to identify the most appropriate package of care and support wrapping around education, this could include transportation for local provision or targeted financial assistance.

5. Actions to advance equality, diversity and inclusion

Action	Lead Officer	Deadline
Placing local authorities to work with parents/carers to consider	Head of SEND in	As required
alternative provision in line with parental preference and secure	placing	
placement for children with an EHCP if the decision is taken to close.	authority	
If the decision is taken to close, we will work with the school to support	Head of SEND in	As required
the smooth transition to new provision to mitigate impact of change.	placing	
	authority	

6. Further Consultation (optional section – complete as appropriate)

<u>Guidance</u>

Is any further consultation planned? Set details out below.

Consultation planned	Date
Pre-proposal consultations (6 weeks)	Monday 6 January 2025
Recommended consultation period of a minimum of 6 weeks.	to Sunday 16 February 2025
Final review of consultation feedback and delegated decision for Director of Children's Services in consultation with the Cabinet lead for children to decide whether to publish statutory proposals for these changes.	July 2025
4-week statutory representations ('formal consultation').	Monday 1 September
Notice to be published in a local newspaper on first day of consultation.	2025 – Sunday 28 September 2025
Cabinet – decision made on closure of the school following formal consultation. Note: Cabinet are required to make decision on the outcome within a 2-month period of closing date of statutory consultation. Decision may be called in for scrutiny within three working days of the decision being published.	November 2025
School closed if proposal approved	31 December 2025