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	Katie Cigari, Josh Huckins, Meri Pesola, Pavlos		
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	Sinnott		
Date approved by Policy and Review Manager	Clare O'Connor 20/12/24		
All EINAs must be signed off by the Policy and Review			
Manager			
Date submitted to Directors' Board	This EINA will be updated post consultation and		
	included as part of all paperwork linked to next steps		

1. Summary

Wandsworth Council has made the decision to commence the statutory consultation process on the discontinuance (closure) of Bradstow School, a community special school with 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 are from Kent. 4 of the children are from Wandsworth (1 of whom is due to end 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.

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 have worked with Kent County Council since November 2021, following a meeting chaired by the Regional Schools Commissioner, to explore the potential for transferring the provision to Kent County Council. However, Kent County Council has recently decided not to proceed with a transfer and so this, combined with significant financial pressures facing the school, has left no other viable option at this time but to consult on closure at the end of the academic year.

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 Council then decides whether to approve the proposals. The 'informal' consultation is due to commence in January 2025.

This EINA will form part of the consultation documentation that will be published, and will be updated with any findings from the consultation process. 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.

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 October 2024. Any data relating to pupil Ethnicity or Primary SEN Need, as well as all London and National figures are based on January 2024 Census as this was the most recent data published.

Evidence	Source
Evidence	Source

Age	School Census October 2024
Age	School Census October 2024
Disability	School Census October 2024
Sex	School Census October 2024
	School Census January 2024 for breakdown by SEN
	Primary need
Race/ethnicity	School Census January 2024
Religion and belief	Bradstow School, December 2024
Free School Meals Eligibility	School Census October 2024
IDACI Band	School Census October 2024
Refugee status	Bradstow School, December 2024

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 will be 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

Protected group	Findings					
Age	The school provides 62 educ	ational places f	for pupils aged 5 to 19.			
	As of October 2024, the scho	ool has 32 child	ren aged 5 to 19, of whom 91% were aged 12-19.			
	Bradstow School has a highe	r proportion of	f pupils who are in National Curriculum Year Groups			
	7 or higher (78%) compared	to all Wandswo	orth special schools (73%).			
	The impact of the potential of	closure of Brad	stow school at the end of the 2024/25 academic			
	year would be greatest for cl	hildren aged 12	2-18, who make up 91% of the school's population,			
	and for children in NC Year G	Groups 7 and al	pove, who make up 78% of the school's population.			
	Bradstow					
	Age (October census 2024)	School (Oct				
	2024)	24)				
	Aged 5-11	9%				
	Aged 12-19	91%				
	Total pupils at Bradstow	32				

National Curriculum	Bradstow	Wandsworth	Wandsworth
Year Group	School	Special	All Schools
	(Oct 24)	Schools (Oct	(Oct 24)
		24)	
Up to NC Year 6	22%	27%	57%
NC Years 7-14	78%	73%	43%
Total pupils	32	904	31,849

Disability

In October 2024, there were 904 children attending a Wandsworth special school, all of whom have an Education Health and Care Plan (EHCP). Of these, 32 pupils were attending Bradstow, all of whom have an EHCP.

Special	Bradstow	Wandsworth	Wandsworth	London	England
Educational	School (Oct	Special Schools	All Schools	Special	Special
Needs -	24)	(Oct 24)	(Oct 24)	Schools	Schools
Education Health				(Jan 24)	(Jan 24)
and Care Plan					
% of pupils in	100%	100%	7%	99%	99%
school with EHCP					
Total number of	32	904	31,849	22,054	156,300
pupils in school					

Bradstow is a community special school that provides education and accommodation to young people with severe learning disabilities who are on the autistic continuum. The SEN Primary Need of pupils is not collected in the October school census, but data from the January 2024 school census showed that 98% of 58 Bradstow pupils had an SEN Primary Need of Autism Spectrum Disorder, compared to 8% for all Wandsworth special schools and 11% for all Wandsworth schools.

SEN Primary Need	Bradstow	Wandsworth	Wandsworth	London	England
	School	Special	All Schools	Special	Special
	(Jan 24)	Schools (Jan	(Jan 24)	Schools	Schools
		24)		(Jan 24)	(Jan 24)
% of pupils in school	98%	8%	11%	43%	36%
with Autism Spectrum					
Disorder as SEN					
Primary Need					
Total number of pupils	58	931	32,795	22,054	156,300
in school					

The impact of the potential closure of Bradstow school at the end of the 2024/25 academic year 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 October 2024, and 98% of pupils have an SEN Primary Need of ASD in January 2024.

Sex Of the 32 pupils in Bradstow in the October 2024 school census, 94% were male and 6% were female. This compares to 74% male and 26% female for all Wandsworth Special Schools, and compares to 51% male and 49% female for all Wandsworth school pupils. Bradstow school is predominantly for pupils with an SEN primary need of Autistic Spectrum Disorder, which has a higher prevalence for males. When considering the SEN primary need of ASD only, Bradstow makes up 83% male in January 2024, compared to 83% male for Wandsworth special schools and 74% male for all Wandsworth schools of 74%. The impact of the potential closure of Bradstow school at the end of the 2024/25 academic year would therefore have the greatest impact on male pupils who make up 94% of Bradstow's population. London England Wandsworth Bradstow Wandsworth Special Special Special Sex of school pupils School (Oct All Schools Schools Schools Schools (Oct 24) 24) (Oct 24) (Jan 24) (Jan 24) 94% 74% 51% 72% 72% Male 6% 49% Female 26% 28% 28% Wandsworth Sex of school pupils who Bradstow Wandsworth Special have a SEN primary need of School (Jan All Schools Schools (Jan 24) (Jan 24) Autistic Spectrum Disorder 24) Male 83% 83% 74% Female 17% 26% 18% Gender N/A reassignment Marriage and N/A civil partnership **Pregnancy and** N/A maternity Race/ethnicity In January 2024, the ethnic breakdown of pupils at Bradstow School were 62% White, 22% Black, 9% Mixed, 5% Asian and 2% Chinese. 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. There were no pupils at Bradstow School who spoke English as an additional language (EAL) in October 2024. The potential closure of Bradstow school at the end of the 2024/25 academic year would therefore have the greatest impact on White ethnic groups who make up 62% of the school's population in January 2024, and those who speak English as a first language who make up 100% of the school's population in January 2024.

Ethnic Breakdowns	Bradstow (Jan 24)	Wandsworth Special Schools (Jan 24)	Wandsworth All Schools (Jan 24)	London Special Schools (Jan 24)	England Special Schools (Jan 24)
Asian or Asian British	5%	13%	17%	19%	11%
Black or Black British	22%	27%	19%	25%	7%
Mixed	9%	16%	15%	13%	7%
Other	2%	4%	6%	7%	2%
White & White British	62%	39%	41%	36%	73%
Minority Ethnic (Asian, Chinese, Black, Mixed and Other)	38%	60%	57%	64%	27%

English as an Additional Language (EAL)	Bradstow (Oct 24)	Wandsworth Special Schools (Oct 24)	Wandsworth All Schools (Oct 24)	London Special Schools (Jan 24)	England Special Schools (Jan 24)
% EAL	0%	29%	39%	34%	15%

Religion and belief, including non belief

Bradstow is a non-denominational school. School places are allocated using the statutory admissions criteria outlined in the SEND Code of Practice (2015) without reference to faith or religion. 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.

Most of the pupils at Bradstow have no religious beliefs (43%). Where pupils did have a religious belief, this was predominantly Christian (39% of all pupils). Therefore, the potential closure of Bradstow school at the end of the 2024/25 academic year would have the greatest impact on Non-belief pupils who make up 42% of the school's population and Christian pupils who make up 39% of the school's population (data as at December 2024).

Policion	Bradstow
Religion	Dec 24
No Religion	44%
Christian	41%
Other religion	13%

Sexual orientation

This data is not collected in the schools' census and therefore it is not possible to determine whether a potential closure of Bradstow school would negatively impact specific sexual orientation groups more than others.

Across groups i.e older LGBT service users or

White, English-speaking males who are aged 12-18 with Autism Spectrum Disorder and live in mid-deprivation areas will be impacted.

Black, Asian & Minority Ethnic young men.

Socio-economic status
(to be treated as a protected characteristic under Section 1 of the Equality Act 2010) Include the following groups:

- Deprivation (measured by the 2019 English Indices of Deprivation)
- Low-income groups & employment
- Carers
- Care experienced people
- Single parents
- Health inequalities
- Refugee status

In October 2024 at Bradstow School, 47% of the 32 pupils were eligible for free school meals (FSM), this was lower than the averages for Wandsworth special schools (56%), London special schools (49%) and England special schools (47%). However, special schools have higher proportions of FSM eligibility than the averages for all state schools, for example only 30% of all Wandsworth school pupils are eligible for free school meals. Therefore, the potential closure of Bradstow school at the end of the 2024/25 academic year would have a greater impact on families who are eligible for free school meals, who make up 47% of the school's population in October 2024.

Eligibility for Free School Meals	Bradstow School (Oct 24)	Wandsworth Special Schools (Oct 24)	Wandsworth All Schools (Oct 24)	London State funded Special Schools (Jan24)	England Special Schools (Jan24)
FSM %	47%	56%	30%	49.3%	47.4%

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%).

Just over a quarter of pupils attending Bradstow in October 2024 (26%) were living in the top 20% most deprived areas of England (IDACI Bandings 1a and 1b). This is lower than the average of 31% for Wandsworth special school pupils and in line with 26% for all Wandsworth school pupils.

More than half of the pupils attending Bradstow in October 2024 (53%) were living in the middeprivation areas of England (20-60% least deprived, IDACI Bandings 3 and 4). This compares to 32% for all Wandsworth special school pupils and 36% for all Wandsworth school pupils.

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 2024/25 academic year would have a greater impact on mid-deprivation families living in the 20-60% least deprived areas, IDACI Bandings 3 and 4, who make up 53% of the school's population.

	Bradstow School (Oct 24)	Wandsworth Special Schools (Oct 24)	Wandsworth All Schools (Oct 24)
Band 1a (Most deprived 0-10%)	13%	16%	14%

Band 1b (Most deprived 10-20%)	13%	16%	12%
Band 2 (Most deprived 20-40%)	13%	27%	25%
Band 3 (Least deprived 40-60%)	28%	22%	22%
Band 4 (Least deprived 20-40%)	25%	10%	14%
Band 5 (Least deprived 0-20%)	9%	9%	13%

Care Experienced

There are currently 4 care experienced young people placed at Bradstow, although none in the care of Wandsworth.

Health Inequalities

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

Refugee status

The school have advised there are no pupils with refugee status as of Dec 2024.

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
	3 children (9.4%) of the 32 cohort as at the October census were aged 18 and hence would be transitioning from Bradstow at the end of the 24/25 academic year.	2024/25 academic year would be greatest for children aged 12-18, who make up 91% of the school's population in October 2024, and for children in NC Year Groups 7 and above, who make up 78% of the school's population. 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.

Wandsworth has undertaken an exercise to match the needs of its 4 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.

To realise our ambition to give children the best care and keep children local to their family, friends and community wherever possible, we have invested in and developed local maintained provision and expanded our local special schools in Wandsworth. This has meant that we have sufficient alternative schools locally and have required fewer placements in Bradstow over the years.

It has been the recommendation to all other placing local authorities by the Director of Children's Services of Wandsworth Council to undertake a similar exercise in order to parallel plan. Given the number of children placed at the provision by Kent County Council, the Head of SEND and Inclusion for Wandsworth Council has already made contact with the Director of Education and SEND in Kent to ascertain if any support is required from Wandsworth.

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
	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
	Kent County Council and other placing
	authorities to support their families and
	child as they transition on.
Disability	The impact of the potential closure of
	Bradstow school at the end of the
	2024/25 academic year 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 in October 24 and
	98% of pupils have an SEN Primary
	Need of ASD in January 24.
	Any school closure resulting in the need
	for a child to change school will be
	disruptive to their education, and that
	impact increases for children with
	SEND. We acknowledge finding
	appropriate alternative provision for
	this group of children may be
	challenging but to mitigate against this
	Wandsworth have undertaken an early
	exercise to match the needs of its 4
	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. It
	has been the recommendation to all
	other placing local authorities by the
	Director of Children's Services of
	Wandsworth Council that they
	undertake similar exercises in order to
	parallel plan, thus supporting a phased
	transition and continuity of care if the
	decision is taken to close.
	uecision is taken to close.
	To realise our collective ambition to
	give children the best care and keep
	children local to their family, friends

	and community wherever possible, we have invested in and developed local maintained provision and expanded our local special schools in Wandsworth. This has meant that we have sufficient alternative schools locally and have required fewer placements in Bradstow over the years.
	If the proposal is approved, responsible individuals in placing local authorities, will work closely with parents/carers to identify, and consult with, suitable alternative schools which caters for those with severe learning difficulties and Autism and which brings them closer to their local area where possible. They will also work with the school to support pupils to integrate smoothly into their new setting.
	Given the number of children placed at the provision by Kent County Council, the Head of SEND and Inclusion for Wandsworth Council has already made contact with the Director of Education and SEND, in Kent to ascertain if any support is required from Wandsworth.
Sex	The impact of the potential closure of Bradstow school at the end of the 2024/25 academic year would have the greatest impact on male pupils who make up 94% of the school's

		population in October 2024. 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.
Gender reassignment	N/A	N/A
Marriage and civil partnership	N/A	N/A
Pregnancy and maternity	N/A	N/A
Race/ethnicity		The potential closure of Bradstow school at the end of the 2024/25 academic year would have the greatest impact on White ethnic groups who make up 62% of the school's population in October 2024, and those who speak English as a first language who make up 100% of the school's population. 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 white 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	The potential closure of Bradstow school at the end of the 2024/25 academic year would have the greatest impact on Non-belief pupils who make up 44% of the school's population and Christian pupils who make up 41% of the school's population (data as at December 2024). Admissions to special schools (which are non-denominational) isn't

Sexual orientation

Socio-economic status (to be treated as a protected characteristic under Section 1 of the Equality Act 2010) Include the following groups:

- Deprivation (measured by the 2019 English Indices of Deprivation)
- Low-income groups & employment
- Carers
- Care experienced people
- Single parents
- Health inequalities
- Refugee status

N/A

The admission criteria for Bradstow school follows the process outlined in the SEND Code of Practice (2015) and the legislation in the Children's and Families Act (2014). Placements are made based on the special educational needs outlined in individual Education, Health and Care Plans (EHCP) and if the specialist provision confirms they are able to meet these needs.

To realise our collected ambition to give children the best care and keep children local to their family, friends and community wherever possible, we have invested in and developed local maintained provision and expanded our local special schools in 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, ttransportation 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

considered on the grounds of religion or belief, but in line with the SEND code of practice, and hence although those pupils of non belief or who are Christian are most impacted by potential closure their religion or belief would not impact future placement as allocation would be consider based on special educational need as outlined in their EHCP

N/A

The potential closure of Bradstow school at the end of the 2024/25 academic year would have a greater impact on families who are eligible for free school meals, who make up 47% of the school's population in October 2024.

The potential closure of Bradstow school at the end of the 2024/25 academic year would have a greater impact on mid-deprivation families living in the 20-60% least deprived areas, IDACI Bandings 3 and 4, who make up 53% of the school's population.

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.

guidance on eligibility. Wandsworth is committed to ensure 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 Kent County Council and other relevant bodies to support each family and child as they transition on.

5. Actions to advance equality, diversity and inclusion

Guidance

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

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

Guidance

Is any further consultation planned? See 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

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.	Monday 17 February to Friday 7 March 2025
4-week statutory representations ('formal consultation').	Monday 10 March 2025
Notice to be published in a local newspaper on first day of consultation.	to Friday 4 April 2025.
OSC and Executive – approving outcome of formal consultation.	Special committee
	likely required:
Note: Executive are required to make decision on the outcome within a 2-month period of closing date of statutory consultation.	April/May 2025 - TBC