

Equality Impact Assessment / Equality Analysis

(Version 4)

Item name	Details
Title of service or policy	SEND Service Update
Name of directorate and service	Education and Safeguarding
Name and role of officers completing the EqIA	Laura Donnelly- Head of SEND
Date of assessment	17/02/2026

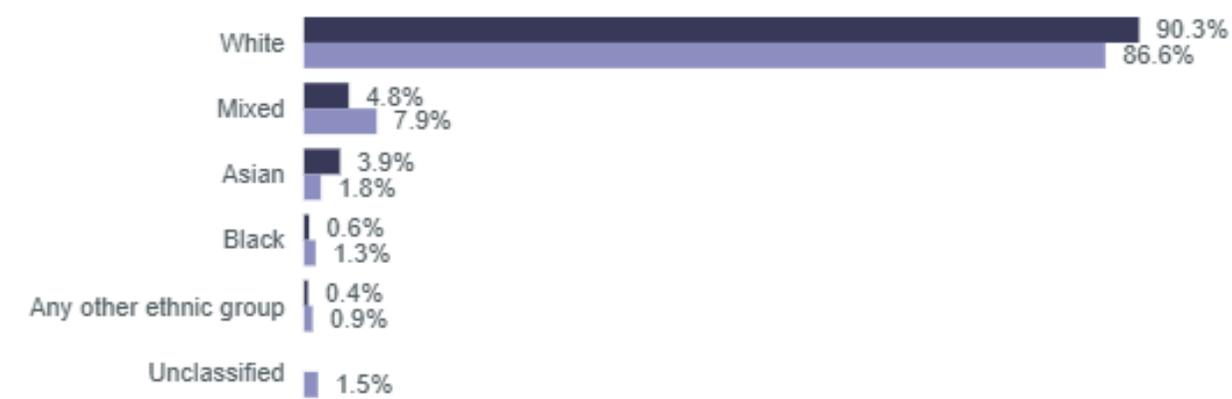
Equality Impact Assessment (or 'Equality Analysis') is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on people and different groups within our community. The main aim is to identify any adverse impacts (i.e. discriminatory or negative consequences for a particular group or sector of the community, and to identify areas where equality can be better promoted). Equality impact Assessments (EqIAs) can be carried out in relation to services provided to customers and residents as well as employment policies/strategies that relate to staffing matters.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EqIA) or Equality Analysis. **Not all sections will be relevant – so mark N/A any that are not applicable.** It is intended that this is used as a working document throughout the process, and a final version will be published on the Council's website following relevant service lead approval.

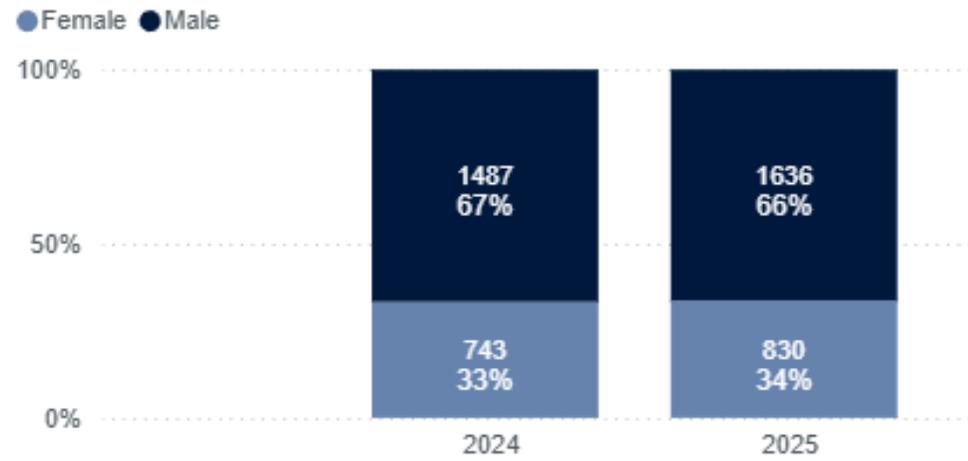
1.1 Identify the aims of the policy or service and how it is implemented

Key questions	Answers / notes
1.1 Briefly describe purpose of the service/policy e.g. <ul style="list-style-type: none"> ● How the service/policy is delivered and by whom ● If responsibility for its implementation is shared with other departments or organisations ● Intended outcomes 	This is an update from the statutory SEND team and does not include any changes to new or existing policy.
1.2 Provide brief details of the scope of the policy or service being reviewed, for example: <ul style="list-style-type: none"> ● Is it a new service/policy or review of an existing one? ● Is it a national requirement?). ● How much room for review is there? 	The statutory SEND service works to deliver the Local Authority's responsibilities under the Special Educational Needs and Disability Code of Practice 2015. This is a national requirement. How this is delivered can be reviewed.
1.3 Do the aims of this policy link to or conflict with any other policies of the Council?	No

2. Consideration of available data, research and information

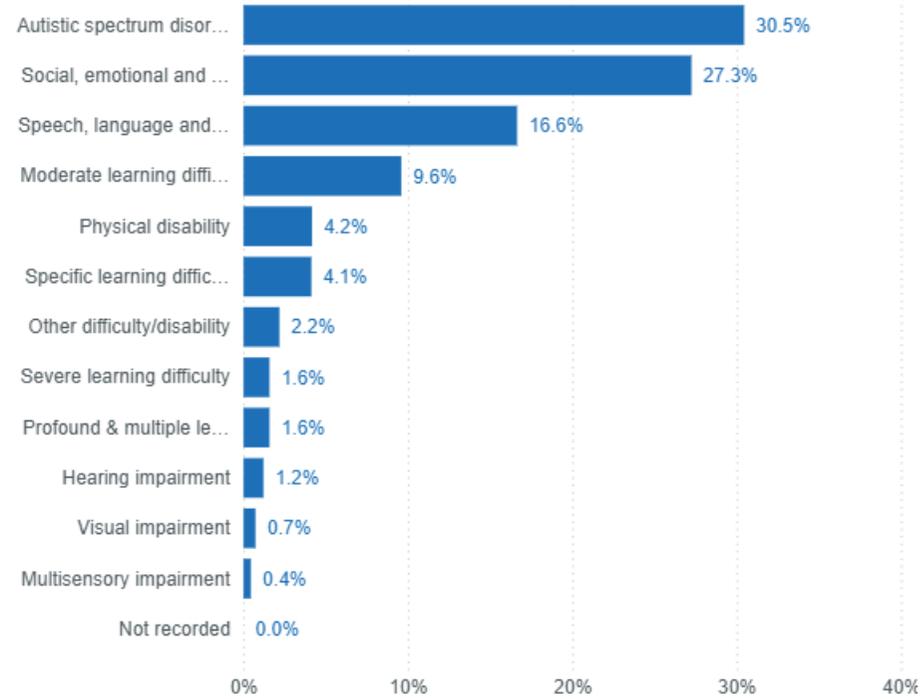
Key questions	Data, research and information that you can refer to																					
<p>2.1 What equality focussed training have staff received to enable them to understand the needs of our diverse community?</p>	<p>All staff have attended mandatory equalities training available on the Council’s Learning Pool. All staff have attended systemic practice workshops. Children's services and Education staff have access to additional training provided by SARI.</p>																					
<p>2.2 What is the equality profile of service users?</p>	<p>Children and young people with an EHCP have additional learning needs that may be considered a disability under the Equalities Act 2010.</p> <p>SEND2 Data: B&NES 0-25 Population and Active EHCPs in 2025, by Ethnic Group</p> <p>● B&NES Population (Census 2021) ● B&NES EHCPs in 2025</p>  <table border="1"> <thead> <tr> <th>Ethnic Group</th> <th>B&NES Population (Census 2021)</th> <th>B&NES EHCPs in 2025</th> </tr> </thead> <tbody> <tr> <td>White</td> <td>90.3%</td> <td>86.6%</td> </tr> <tr> <td>Mixed</td> <td>4.8%</td> <td>7.9%</td> </tr> <tr> <td>Asian</td> <td>3.9%</td> <td>1.8%</td> </tr> <tr> <td>Black</td> <td>0.6%</td> <td>1.3%</td> </tr> <tr> <td>Any other ethnic group</td> <td>0.4%</td> <td>0.9%</td> </tr> <tr> <td>Unclassified</td> <td>-</td> <td>1.5%</td> </tr> </tbody> </table>	Ethnic Group	B&NES Population (Census 2021)	B&NES EHCPs in 2025	White	90.3%	86.6%	Mixed	4.8%	7.9%	Asian	3.9%	1.8%	Black	0.6%	1.3%	Any other ethnic group	0.4%	0.9%	Unclassified	-	1.5%
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Active EHCPs by Sex, for B&NES CYP

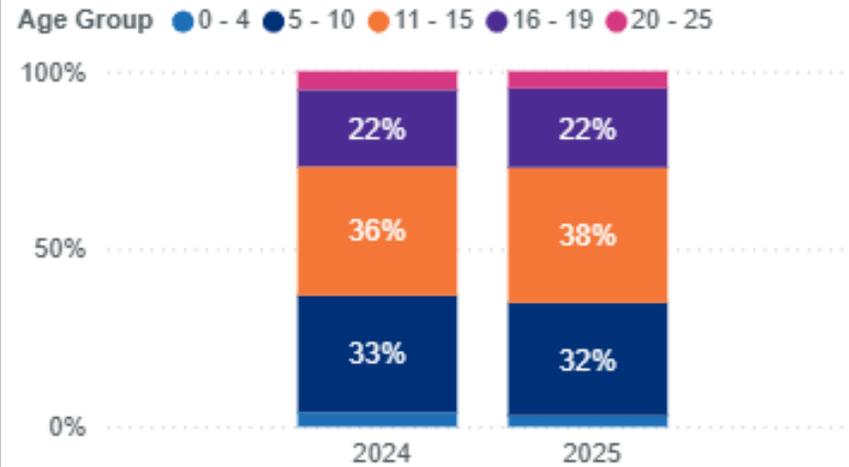


Active EHCPs by Primary Need in 2025

● B&NES



Active EHCPs for B&NES CYP, by Age Group



2.3 Are there any recent customer satisfaction surveys to refer to? What were the results? Are there any gaps? Or differences in experience/outcomes?

A recent survey of parents and carers tells us that whilst the service has improved its communication with families, we still have further improvements to make. The service is working with Zoom and CoPilot to improve communication and have recently moved to a call centre telephone model making us easier to reach. Booking links are now provided for all practitioners.

Families also tell us that our adherence to statutory timeframes need to be improved, which is addressed in this paper.

2.4 What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?

None

2.5 If you are planning to undertake any consultation in the future regarding this service or

The Statutory SEND Head of Service meets fortnightly with the parent carer forum for consultation, and monthly to discuss communications.

policy, how will you include equality considerations within this?	Parent carers form part of our ongoing multiagency quality assurance group.
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3. Assessment of impact: 'Equality analysis'

Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy:

- Meets any particular needs of equalities groups or could help promote equality in some way.
- Could have a negative or adverse impact for any of the equality groups

Key questions	Examples of what the service has done to promote equality	Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this
<p>3.1 Issues relating to all groups and protected characteristics</p>	<p>The needs of children and young people, as identified using a multi-agency approach, and are detailed in their EHC assessment and subsequent plan. Provision and placement is agreed using the process outlined in the code of practice section 9, underpinned by the CFA 2014 and associated case law.</p> <p>Families can access independent support from SENDIAS and the Banes Parent Carer Forum to help them navigate this process, and formal mediation is available, funded by the LA, should support a disagreement be required.</p> <p>The LA funds the parent carer forum to support families with this process if needed.</p>	<p>Children and young people are provided with support via an education health and care plan based on their assessed needs.</p> <p>Delays in the process may result in delays in provision, having a detrimental effect on the progress of children and young people.</p>

<p>3.2 Sex – identify the impact/potential impact of the policy on women and men.</p>	<p>34% of EHCPs in B&NES are issued to females. The percentage issued to females is higher than in our statistical neighbours (30%) and England (29%).</p>	<p>The local authority continues to work hard to address the imbalance in plans being issued between girls and boys and recognises that this is an ongoing piece of work that requires further attention.</p>
<p>3.3 Pregnancy and maternity</p>	<p>Pregnant young people will receive person centred planning to support them during pregnancy and maternity. This support is the responsibility of the school or education setting, who provide reasonable adjustments</p> <p>Pregnancy and maternity do not form part of an EHCP and would not be included in the plan.</p>	<p>There are not anticipated to be any adverse or negative impacts on this protected characteristic.</p>
<p>3.4 Gender reassignment – identify the impact/potential impact of the policy on transgender people</p>	<p>The EHCP process promotes equality by signposted to inclusive and affirming services for children and young people. Services are designed to address challenges such as discrimination, stigma, or mental health concerns that may disproportionately affect young people who are questioning their gender identity.</p> <p>B&NES Commissioned services include: Off the Record provide LGBTQ+ support services. SARI to provide training and practice reflective sessions.</p> <p>All colleagues in the SEND team attend systemic relationship training.</p>	<p>There are not anticipated to be any adverse or negative impacts on this protected characteristic.</p>
<p>3.5 Disability – identify the impact/potential</p>	<p>EHCP decision making within the Local Authority is made based on a robust and co-produced scheme of delegation.</p>	<p>Children and young people are provided with support via an education health and care plan based on their assessed needs.</p>

<p>impact of the policy on disabled people (ensure consideration of physical, sensory and mental health needs/differences)</p>	<p>This is audited via an internal and external (multi agency) quality assurance process and reports into the Local Area Inclusion Partnership (attached).</p> <p>The Local Authority commissions SENDIAS as an independent advice service for families, alongside peer support provided by the BANES parent carer form who provide impartial advice for families should they need support to challenge decisions made by the Local Authority. Lines of redress include mediation, tribunal, local ombudsman review and judicial review.</p> <p>All colleagues in the SEND team attend systemic relationship training.</p>	<p>Delays in the process may result in delays in provision, having a detrimental effect on the progress of children and young people. Processes are in place to ensure families wait well.</p>
<p>3.6 Age – identify the impact/potential impact of the policy on different age groups</p>	<p>EHCPs are issued for children and young people aged 0-25.</p> <p>It is noted that there is a spike in EHCPs during key school transition times. This informs us that a focus on moving between schools, from school to college and into adulthood requires careful consideration to ensure a continuity of care and support.</p>	<p>There are not anticipated to be any adverse or negative impacts on this protected characteristic.</p>
<p>3.7 Race – identify the impact/potential impact on across different ethnic groups</p>	<p>The SEND Team promotes equality by ensuring services are culturally sensitive and address the specific needs of children and young people from all racial and ethnic backgrounds. This includes commissioning placements and support services that respect and reflect the cultural, linguistic, and religious identities of children. The team works to address disparities by monitoring outcomes for children from minority ethnic backgrounds and ensuring equal access to high-quality services. Collaboration with culturally competent providers and</p>	<p>There are not anticipated to be any adverse or negative impacts on this protected characteristic.</p>

	<p>community organisations ensures children feel valued and supported in their heritage, while also combating discrimination or bias within service delivery. The team commission SARI to provide training and practice reflective sessions for staff. Individuals and families are supported to access SARI for Race related issues or incidents.</p> <p>B&NES Race Equality Charter Mark is proactively acting within schools and education settings to:</p> <ul style="list-style-type: none"> • challenge racism and racial harassment • promote race equality and cultural diversity • foster good race relations <p>Fosseway School are members of this multi-agency partnership: https://www.bathnes.gov.uk/race-equality-charter-schools</p> <p>We do not use ethnicity data when deciding if a child/young person is eligible for support or placement.</p> <p>All colleagues in the SEND team attend systemic relationship training.</p>	
<p>3.8 Sexual orientation – identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual,</p>	<p>In relation to sexual orientation, the EHCP process promotes equality by signposted to inclusive and affirming services for children and young people of all sexual orientations. Services are designed to address challenges such as discrimination, stigma, or mental health concerns that may disproportionately affect LGBTQ+ children.</p> <p>B&NES Commissioned services include:</p>	<p>There are not anticipated to be any adverse or negative impacts on this protected characteristic.</p>

questioning people	<p>Off the Record provide LGBTQ+ support services. SARI to provide training and practice reflective sessions. Individuals and families are supported to access SARI</p> <p>We do not collect sexual orientation data or use this in any part of our decision making.</p> <p>All colleagues in the SEND team attend systemic relationship training.</p>	
<p>3.9 Marriage and civil partnership – does the policy/strategy treat married and civil partnered people equally?</p>	<p>In relation to marriage and civil partnerships, the EHCP process promotes equality by ensuring that services are inclusive and sensitive to the diverse family structures and legal partnerships that children and young people may encounter. This includes recognising the role of married or civilly partnered carers, such as foster carers or adoptive parents, in providing stable and nurturing environments. The team ensures that SEND services do not discriminate based on marital or partnership status and that all families are treated equitably</p>	<p>There are not anticipated to be any adverse or negative impacts on this protected characteristic.</p>
<p>3.10 Religion/belief – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.</p>	<p>B&NES recognises its statutory duty to have a Standing Advisory Council on Religious Education (SACRE). The B&NES SACRE monitors standards of religious education and collective worship in our schools and to promotes interfaith respect and understanding. https://www.banes-sacre.com/about</p>	<p>There are not anticipated to be any adverse or negative impacts on this protected characteristic.</p>

<p>3.11 Socio-economically disadvantaged* – identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances (this is not a legal requirement, but is a local priority).</p>	<p>The B&NES Affordable School Programme aims to 1) increase understanding of the barriers and challenges faced by pupils and families who are living with financial hardship and poverty. 2) help schools make positive changes to policies and practices https://thehub.bathnes.gov.uk/Page/21430</p> <p>All decision making panels consider decisions relating to children supported by social or who are in receipt of free schools meals before other children, and placement allocations are also considered for them first.</p> <p>All colleagues in the SEND team attend systemic relationship training.</p>	<p>It is recognised that children and young people from more affluent family backgrounds have access to private reports and services paid for by families.</p> <p>All such reports are reviewed by colleagues in NHS/LA services to review equity of offer, and when appropriate, over provision is challenged.</p> <p>There is inequity in access to tribunal services, which is addressed through support provided by BANES Parent Carer Forum and SENIAS, however inequality still remains in this area.</p>
<p>3.12 Rural communities* identify the impact / potential impact on people living in rural communities</p>	<p>Link to B&NES SEND Home to School Transport Policy https://www.bathnes.gov.uk/get-school-transport</p> <p>Link to the Equality Impact Assessment for the SEND Home to School Travel Policy for compulsory school age children https://www.bathnes.gov.uk/sites/default/files/SEND-HTST-Policy-Review-EIA.pdf</p>	<p>There are not anticipated to be any adverse or negative impacts on this protected characteristic.</p>

<p>3.13 Armed Forces Community ** serving members; reservists; veterans and their families, including the bereaved. Public services are required by law to pay due regard to the Armed Forces Community when developing policy, procedures and making decisions, particularly in the areas of public housing, education and healthcare (to remove disadvantage and consider special provision).</p>	<p>B&NES is a signatory to The Armed Forces Covenant https://www.bathnes.gov.uk/armed-forces-covenant</p>	<p>There are not anticipated to be any adverse or negative impacts on this protected characteristic.</p>
<p>3.14 Care Experienced *** This working definition is currently under review and</p>	<p>The LA takes the view that the EHCPs of young people who are care experienced will continue until 25, unless requested to be ceased by the young person. This is to recognise the challenges faced by those who are care experienced and ensure adequate additional time is given to those young people to make decisions regarding education.</p>	<p>Due to the high number of young people who are in care out of county, it is acknowledged that returning to B&NES at 18 poses challenges for reintegration and education planning.</p>

<p>therefore subject to change:</p> <p>In B&NES, you are 'care-experienced' if you spent any time in your childhood in Local Authority care, living away from your parent(s) for example, you were adopted, lived in residential, foster care, kinship care, or a special guardianship arrangement.</p>	<p>The SEND service works collaboratively with the care experienced team to ensure the very best transition to post 18 services, including additional support planning for future education and employment.</p>	
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*There is no requirement within the public sector duty of the Equality Act to consider groups who may be disadvantaged due to socio economic status, or because of living in a rural area. However, these are significant issues within B&NES and have therefore been included here.

** The Equality Act does not cover armed forces community. However, the Armed Forces Bill (which came in on 22 Nov 2022) introduces a requirement to pay 'due regard' to make sure the Armed Forces Community are not disadvantaged when accessing public services.

***The Equality Act does not cover care experienced people. B&NES adopted this group as a protected characteristic in March 2024 alongside over 80 other Local Authorities. Although we have data for care leavers and children/young people who are currently in the care of B&NES we do not have wider data on disadvantage experienced through being in care.

4. Bath and North East Somerset Council Equality Impact Assessment Improvement Plan

Please list actions that you plan to take as a result of this assessment/analysis. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. The actions need to be built into your service planning framework. Actions/targets should be measurable, achievable, realistic and time framed.

Issues identified	Actions required	Progress milestones	Officer responsible	By when
Timeliness of needs assessments impacting support for disabled children and young people	An action plan is in place to improve adherence to statutory timescales	Educational Psychology service clear the backlog of assessments by April 1 st 2026 SEND service reaches its goal of 60% timeliness by September 2026 (above national average of 47%)	Laura Donnelly	September 2026

5. Sign off and publishing

Once you have completed this form, it needs to be 'approved' by your Divisional Director or their nominated officer. Following this sign off, send a copy to the Equality Team (equality@bathnes.gov.uk), who will publish it on the Council's website. Keep a copy for your own records.

Signed off by:

Chris Wilford

(Divisional Director or nominated senior officer)

Date: 25.2.26