

Subject:	Special School and Pupil Referral Unit (PRU) Reorganisation Proposals		
Date of Meeting:	19 June 2017		
Report of:	Executive Director- Families, Children & Learning		
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Wards affected:	All		

FOR GENERAL RELEASE

1. PURPOSE OF REPORT AND POLICY CONTEXT

- 1.1. This report is the latest in a series taking forward wide-ranging recommendations resulting from the 2014 review of special educational needs and disability (SEND) provision.
- 1.2. Recommendations in this report relate to the planned re-design of special school and Pupil Referral Unit (PRU) provision in the city. These proposals:
 - are based on a vision to improve the integrated education, health and care offer for our most vulnerable young people
 - re-design our existing six special schools and two Pupil Referral Units into three 'hubs' offering enhanced education, health support and extended day provision on one site
 - maintain the number of special school and PRU places available
 - consolidate provision so that it runs more efficiently and more sustainably into the future
- 1.3. Specifically the report provides:
 - (i) feedback on the local authority's formal consultation on the proposal to redesign special school and Pupil Referral Unit provision to create three hubs, and seeks approval to proceed to publish statutory notices to achieve this.
 - (ii) an update on other areas of the review, including the merger of the two Pupil Referral Units and the development of the new early years provision for children with very complex special educational needs within a mainstream nursery to release the current bases of Jeanne Saunders Centre and Easthill Park.

2. RECOMMENDATIONS

- 2.1. That the outcome of the formal consultation on the proposals to:

i. expand, re-designate and extend the age range up to the age of 19 years of Hillside Community Special School

ii. close Downs Park Community Special School

to form the integrated hub for severe and complex learning difficulties in the west of the city be noted and agreement be given to the publication of statutory notices to progress this proposal

2.2 That the outcome of the formal consultation on the proposals to:

i expand and re-designate Downs View Community Special School

ii close the Cedar Centre Community Special School

to form the integrated hub for severe and complex learning difficulties in the east of the city be noted and agreement be given to the publication of statutory notices to progress this proposal.

2.3 That the outcome of the consultation on the proposal to expand pupil numbers and site of Homewood College and to extend the age range of pupils from 11-16 to 5-19 be noted and agreement be given to the publication of statutory notices to progress this proposal.

2.4 That the outcome of the consultation on the creation of an integrated hub for pupils with social, emotional and mental health needs, formed by merging the two Pupil Referral Units and bringing them together with Homewood College be noted.

2.5 To note the update on other areas of the review.

3. CONTEXT/ BACKGROUND INFORMATION

3.1. The LA began a wide ranging review of its provision for children with special educational needs in 2014. There have been a number of milestones as the review has progressed towards more specific proposals for change. The review's journey is outlined in Appendix 1.

4. THE REDESIGN OF THE EXISTING SPECIAL SCHOOLS AND TWO PUPIL REFERRAL UNITS INTO THREE 'HUBS'

4.1. At their meeting on 6 March 2017 the Children, Young People and Skills Committee gave approval to formally consult on the redesign of the city's existing special schools and two Pupil Referral Units to form three 'hubs' offering enhanced and integrated education, health support and extended day provision. It was proposed that the hub for pupils with learning difficulties in the west of the city should be formed from merging Hillside Community Special School and Downs Park Community Special School. The hub in the east of the city for those with learning difficulties would be formed from the merger of Downs View Community Special School and Cedar Centre

Community Special School. Bringing together the existing Homewood College and the two Pupil Referral Units would create the hub for those with social, emotional and mental health needs across the city.

- 4.2. The consultation process ran from 15th March 2017 until 9 May 2017.
- 4.3. Feedback was welcomed from everyone and could be submitted online via the council's consultation portal or by sending responses by email, on paper or via the consultation voicemail. The consultation process included a range of events for staff and parents at all affected provision, alongside other opportunities for pupils and other groups of people across the city who have an interest in SEND to discuss the proposals and give us their views. During the period of the consultation, there was ongoing discussion with headteachers, governing bodies and management committees. Further information about the consultation process is included in Appendix 2.
- 4.4. The LA received 211 responses, 203 via the online consultation portal, 7 via email and one via voicemail. 12 of the responses were on behalf of groups and represented the views of a larger group of people. Over 300 people attended events or were interviewed in person or on the telephone.
- 4.5. All responses were reviewed by council officers and representatives from both the Parent Carers' Council and Amaze. Appendix 2 gives a more detailed summary of responses. It is important to balance the responses from the 300 attendees at events with those received online. The consultation meetings generated more positive responses overall as the presence of key headteachers and governors alongside LA officers allayed a number of concerns and any views based on misunderstandings could be corrected.

The views of all respondents have been taken in to account. Copies of responses received via the online consultation, other consultation opportunities and feedback from events are available in the Members' room.
- 4.6. The development of additional post 16 provision as part of the hub development was supported (55% were in favour for the Integrated Hub West, and 42% for SEMH), although in the comments there was some difference in opinion about where this should be provided and to what age. The opportunity for more integrated working alongside increased therapies and services as part of the extended day was also highlighted as a positive change in the offer to be made from the hubs. The development of the SEMH hub broadly received a balance of positive and negative comments (39% in favour, 37% against) this was generally replicated in the feedback on the other hubs too.
- 4.7. However, views from some parents and staff were less positive about the value of the proposed changes in the east and west hubs (43% in favour in the East, 42% in favour in the West). This is perhaps understandable given that in each of these hubs, proposals are for one school to 'close' as part of the merger even although numbers of places would remain the same and this was a worry for a number of staff and parents. Given the success of existing high quality educational provision, a significant number of parents and school

staff were not convinced that this would be any better if delivered via a hub and this concern is reflected in the relatively high proportion of respondents who neither agreed nor disagreed. At the same time, there was recognition of the need for greater financial security for this provision and so some respondents proposed alternative ways of grouping the schools. The need for greater flexibility, economies of scale and a more sustainable model in the longer term was identified by school leaders and governors as a particularly significant benefit of the creation of the new hubs.

4.8. Respondents commented on a range of issues, and the areas which attracted the most views were:

- the impact that any change at all might have
- the wider mix of pupils in the hubs and
- the development of more post 16 provision.

5. SUMMARY OF THE MAIN POINTS RAISED, WITH RESPONSES

5.1. The prospect of change

Parents and were generally very happy with the current provision made for their child's needs and appreciated the high quality of the city's special provision, which are all rated good or outstanding by Ofsted. Any change that might disrupt this caused some parents and staff anxiety. However, maintaining the status quo is not an option as the city's large number of very small schools is not financially sustainable. The level of commitment from senior leaders to continuing to build on the quality offered at the moment to make the best possible provision in the future for the city's most vulnerable children and young people acknowledges the views of those who urged change, and offers reassurance that the current quality will at least be maintained or enhanced. The existing governing bodies have begun to work together in different groupings, so that the transition from one model to another is as smooth as possible for everyone. This should mitigate the concerns expressed that the mergers would result in a 'take over' of one school over another to the point of domination. Both the LA and the governing bodies have been keen to emphasise that the hubs will be deemed new organisations and the ethos developed with the shared perspective of school leaders, staff, parents and pupils. The council has agreed a long lead in time for any changes, as it is proposed that the hubs come into being on September 2018 and changes will be introduced over a number of years to minimise disruption for individual pupils. In some instances, ie the Pupil Referral Units, pupils were not always in agreement with their parents and welcomed the prospect of change, particularly new facilities and a wider curriculum offer. The proposal to increase post 16 opportunities received very positive feedback.

5.2. The level of detail

Although they recognised that this consultation focussed primarily on the model of provision and its legal framework, some respondents felt that they would have liked more detail about how the hubs might work on a day to day basis to be confident that they would be able to provide effectively for the

needs of pupils and families. Governors and senior leaders attended the consultation meetings with parents and were able to give reassurance not only that they would want to retain the best of what currently exists and plan any changes sensitively and over time, but also that they were committed to involving parents in taking the hubs forward, so that what is provided in the future for pupils and their families is tailored to their needs. The LA would ensure that senior leaders have the feedback from the consultation so that they can use this to frame their early thinking and talk further to staff and families in the spirit of engagement and co-production.

5.3. Impact on pupils

Whilst there was some anxiety about the impact of changes to schools with which pupils are already familiar, it was acknowledged that the development of hubs will broaden what they can offer to pupils within the learning curriculum and in their social and personal development. The continuing need for programmes tailored to the needs of individuals, with a particular focus on personalised learning was considered important to ensure that pupils maximise their potential. There was support for the new provision to be introduced over a period of time, as it was agreed that this would minimise disruption for pupils. The vast majority of pupils will remain on their current site with familiar staff. Where the needs of individual pupils might necessitate some changes, then this will be managed sensitively with a personalised plan for each pupil. Downs View School has had recent experience of a significant building work project adjacent to the school which was managed effectively to keep noise to a minimum and minimise any impact on pupils. The school's senior leaders were able to offer reassurance to parents that building work to extend the school or refurbish existing buildings would be managed similarly.

5.4. The size of the new hubs

Many parents liked very small schools and were keen to retain the personalised approaches that current provision is able to offer. The importance of continuing to tailor provision to the needs of individuals was a clear message in the consultation feedback and school leaders were able to explain that this approach, proven to be effective, would be maintained. Some respondents were very supportive of the council's rationale for creating larger organisations which could operate more flexibly and make the best use of resources. Strategic leaders in particular acknowledged that even at the new pupil numbers they would not constitute large schools, compared to both similar provision in neighbouring LAs and the national picture and would offer exciting opportunities to do things differently.

5.5. The combination of schools to create the hubs

Whilst recognising the need to create larger schools with greater opportunities for flexibility and efficiency, some respondents questioned the rationale for bringing together the schools in the combinations which the proposals put forward. A small number of these suggested alternatives, for example bringing together Cedar Centre and Downs Park, whose pupil populations were felt to be similar, alongside a merged Hillside and Downs View. This had been considered at an earlier stage of the review debate but

not favoured, as it limited parental choice further and did not make best use of the benefits arising from the geographical location of the existing schools. Cedar Centre and Downs Park have historically been part of a Federation of three schools but this model has not enabled them to maintain an even balance of pupil numbers.

5.6. Inclusion

The proposal to bring together a wider range of pupils with special educational needs in one hub created considerable debate. Those who supported the concept of inclusion in its broadest sense had no problem with this. However, others did not want the pupils either across the whole age range or with different needs to mix together. There was a difference in opinion about the apparent disparity between the council's commitment to inclusion and the extension of the age ranges of the new provision, although it was recognised that this increased the options available to parents. Concern was expressed about how the admission of very young children, particularly to SEMH provision, might lead to early 'labelling' of children, which was felt to be undesirable. Some parents were worried that resources might come under pressure by the demands of those with profound and multiple learning difficulties, or that the needs of those deemed less complex might be overlooked. Some health colleagues in particular suggested that the schools should be brought together according to need, rather than locality. However, the council continues to have a legal duty to meet the needs of all pupils with special educational needs and disabilities. There is confidence, based on the experience of other LAs who have developed similar provision that this can be achieved very successfully in schools with a wider range of needs. There are a number of ways in which this can be managed-by the creative use of sites, a range of groupings according to learning style, pupil need and social, emotional and communication issues. The city's current PRU provision for primary and Key Stage 4 is effectively managed on the same site, but with separate accommodation and entrances, and offers one model of using sites creatively. Some parents who have opted to educate their children with very complex needs in mainstream were keen that consideration be given to them being able to access the wider range of services which are planned to be developed within the hubs.

5.7. The breadth of the new provision

Some parents were anxious that the needs of those pupils on the autistic spectrum were not being sufficiently addressed within the proposed changes. The current special schools all have pupils with a diagnosis of autism and this will continue. The council also plans to develop a new Special Facility in a mainstream secondary school to enable the needs of those with a range of communication difficulties to be met. It is planned that this should open in September 2018. Additionally the LA is looking to create a small specialist unit within one of the hubs for the small number of more able pupils with autism/Asperger's syndrome, whose challenging behaviour or mental health needs mean that they cannot cope in a mainstream school. The LA acknowledged the view of some parents that a change in designation of Hillside and Downs View to the generic term of 'learning difficulties' may not reflect the full breadth of needs that the hub is intended to meet. Thus the

proposed re-designation has been adjusted to 'severe and complex learning difficulties.' The hubs should be able to offer a wider range of curriculum opportunities than previously available through smaller schools and this is likely to result in a curriculum that is more tailored to the ability, needs and interests of pupils than ever before, including those on the autistic spectrum. Respondents were keen that a wide range of accreditation options would be available in the new hubs, so that individual students could explore their talents fully, and gain qualifications according to their potential. PRU pupils were particularly keen to access a wider and more creative curriculum than at present, and the creation of the SEMH hub is intended to offer increased flexibility by giving specialist staff the opportunity for staff development to work across different cohorts.

5.8. **Post 16 provision**

This was an area of the consultation which solicited strong views. Most respondents were in favour of the proposal to extend opportunities for provision beyond the age of 16. However, there were a range of views about what this might look like and who could offer this provision. Existing providers of post 16 provision for those with the most severe and complex needs at Downs View Link College preferred that this should be expanded to retain a citywide provision for this cohort of students, although it was recognised that the numbers of students would exceed the capacity of the current building. There was considerable support from those mostly closely linked with the west and citywide SEMH hubs that the creation of post 16 provision elsewhere would enable there to be a broader range of models and thus offer different pathways to adulthood. It is intended that the new provision delivered via the other hubs should focus more on enhancing opportunities for those who could access local college courses or pathways to employment with the right level of specialist help, thus creating joint ventures with other providers. It was acknowledged that the original proposal created some inequality in the proposed age ranges for post 16 provision and the LA has addressed this in response to the views expressed during the consultation. The proposed age range for the SEMH and west hub is now extended to aged 19.

5.9. **Closer working between the Pupil Referral unit and Homewood College**

The principles behind closer working between these two LA provisions received support. Whilst many saw the benefits of closer working, some were concerned about what this would mean in practice. The need to limit the number of pupils with SEMH on one site was highlighted as important to maintaining a productive learning environment, and utilising more than one site was felt to be key to the hub being able to effectively meet the diversity of need of pupils with SEMH. Linking the newly merged PRU and Homewood College to form the new SEMH hub will enable a more flexible response to meet the LA's responsibilities towards those whose challenging needs limit their ability to access mainstream schools. The significant rise in the number of exclusions in the last year has presented a significant challenge to the LA to meet its statutory responsibilities with the existing configuration of services. The merger of the two Pupil Referral Units does not require a statutory notice to achieve the change in model, although the governance arrangements for future working will need to be established appropriately, for which negotiations

between governors and the members of the management committees have already begun. The views of many respondents reinforced the need for the LA to carefully consider the appropriate use of sites to accommodate different aspects of social, emotional and mental health needs. This will be a key consideration in planning the operational structure and management of the SEMH hub.

5.10. **Integrated working**

Meeting the holistic needs of pupils though working effectively together was rated as the one of the highest priorities at an earlier stage in the SEND review. Many respondents agreed that this would be a significant benefit of how the hubs would deliver what pupils need. The allocation of the proposed additional £300,000 across the 3 hubs for therapies and health services was welcomed. There was support for a greater role for school leaders in joint commissioning what services can be provided, and how they might best be integrated into the hub's core offer. Early work has begun with key partners to plan for any changes that might be necessary to secure joint planning and delivery of services.

5.11. **Admissions**

Some parents whose children do not currently attend their most local special school were anxious that they would be required to move their child to the hub closest to their home address. This consultation does not propose any changes to the admission arrangements to special provision. The LA would always look to place a child in their most local school, if that school is able to offer provision appropriate to a child's needs. However, parents still have a right to express a preference, and the LA is obliged to comply with that preference as long as it would not be unsuitable for the age, ability, aptitude or SEN of the child or young person, or the attendance of the child or young person there would be incompatible with the efficient education of others, or the efficient use of resources. A very small number of pupils have dual placements with mainstream schools, and the new hub arrangements do not change the city's policy and practice on these. Hubs will be encouraged to develop increased opportunities for links with mainstream schools.

5.12. **Transport**

Some parents had queries about entitlement to home to school transport, and how this might impact on which hub a child might attend, as well as the options available to families, particularly in relation to services which might be offered via the hubs in future. The council's policy on home to school transport does not form part of this consultation. However, transport arrangements will need to be considered carefully when the hubs develop an extended day, to ensure that equalities principles are upheld.

5.13. **Traffic**

Concerns about the impact of the creation of the hubs on local traffic were raised by a small number of respondents. As the number of children attending our special provision is not likely to change significantly, it is not envisaged that there will be an increase to the traffic involved in transporting pupils between their home and the hub. However, alterations to site access and car

parking will form part of the discussions about the improvements to the new hub sites.

5.14. **Sites**

Many comments were received about the location of the new provision. A number of queries emerged about the future use of current sites. No sites in current use are likely to be relinquished until it is decided that a site is no longer needed. Respondents acknowledged that some sites are no longer fit for purpose (eg Dyke Road KS3 Pupil Referral Unit, which lacks outside space and accommodation which restricts the curriculum able to be offered there). Others will need refurbishment or new buildings. £7.5 million capital funding has been secured to spend on the improvements necessary to enable the three hubs to have the appropriate facilities to meet the needs of their new pupil population, although some doubted whether this would be sufficient. The need for the SEMH hub to be based across a number of different sites was a strong message, as SEMH encompasses both a very diverse range of needs and different patterns of provision depending on whether a pupil has an Education, Health and Care plan (EHCP) or is excluded, for example. The LA intends to address the issues about sites sensitively, working closely with colleagues in the property team to make the most creative use of available accommodation and the additional capital funding.

5.15. **Funding**

There was some scepticism about the financial case for change, a few suggesting that the proposed changes were merely a budget saving exercise. Making the proposed changes will enable the available funding to be used more efficiently and effectively, so that the city's special provision is sustainable into the future. The status quo is not an option, as there are budget deficits across a range of special provision which can no longer be netted off against historic balances or bridged by additional funding from the LA. This was a strong message to staff and parents at consultation events. It is not yet clear exactly how the new funding changes at national level would impact on the city's special provision, but school leaders were positive that a larger number of pupils in each hub and thus larger budgets would give them optimum flexibility to make the best use of available resources.

5.16. **Staffing**

Whilst many saw that the creation of the new hubs and the extension of provision in some hubs to include early years and post 16 provision might create new professional opportunities for staff, and some staff welcomed this, it was recognised that changes to the staffing structures in the hubs might also mean seeking economies of scale over time and this would impact on staff job security. The presence of union representatives at consultation meetings with staff groups gave them confidence that the appropriate HR processes would be put in place to manage any changes. There was a widespread view that the expertise within the city's current provision was highly valued and to be retained if at all possible. The intention is to focus resources on frontline services and direct support for pupils. The attendance of governors at consultation events also gave them the opportunity to reinforce their intention to exercise sensitivity in the management of any

change. Clarification was given at consultation events that the LA's role was strategic in the creation of the new model of provision, while the responsibility for developing an appropriate staffing and operational structure lies with the governing body.

6. THE OUTCOME OF THE CONSULTATION

- All responses to the consultation on the creation of the new hubs have been carefully reviewed, alongside three other significant elements of consideration: an analysis of the current model of provision in the city which does not reflect the present pattern of need and demand for places
- the support for change evident during the review process
- the analysis of the current and future budget position

6.1. There are significant budget pressures facing all schools at this time. These have been brought about by cumulative cost pressures, such as pay rises and higher employer contributions to national insurance and pension schemes. At the end of the 2016/17 financial year special school budgets in Brighton and Hove showed a net overspend of £164,000, with 3 of the 8 schools having an overspend totalling £452,000. Some schools had been able to draw on historic underspends to avoid going over budget because of spiralling costs, but this is no longer sustainable. There is a considerable challenge for these schools to bring their budgets back into balance and it is likely that licensed deficit arrangements will be necessary. The economies of scale that should be delivered through the SEND Review and specifically the redesign of the special schools and Pupil Referral Units will better enable schools (hubs) to achieve balanced budgets.

6.2. A number of related issues were also raised during the consultation which were not the focus of these specific proposals and these will be considered as the review progresses. The new hub leaders will also be provided with further details about the consultation feedback. The LA intends to draft a statement of principles as a foundation for the ongoing development of the hubs and set out the expected outcomes of the redesigned provision.

6.3. It is acknowledged that there were a range of views on the proposals. However taking everything into account, it is felt that to move forward with the proposals to create the hubs would mean the following benefits for the city:

- a) each hub will be able to provide a holistic package of support for pupils and their families through a much more integrated offer across education, health and care/respite on site
- b) proposals respond to feedback from families that they want to see better coordination across education, care and health so that personalised plans for children have a unified set of objectives and outcomes

- c) the integrated hub model supports families to build resilience and stay together by:
 - a better extended day/short break offer where needed
 - direct support to families at home where children have challenging behaviour or very complex needs
- d) the availability of provision within the city which can offer a holistic package for children with multiple needs will reduce the need to resort to expensive out of city placements
- e) parents can be assured that high quality education can be maintained in all hubs, as each hub would consist of a school which has been consistently rated as outstanding and one as good
- f) proposals extend the age range to 19 at all three hubs and allow for more support in the transition to adulthood where needed
- g) best value would be achieved through the largest proportion of funding focussed on pupils and front line services, made possible by a streamlined management structure being in place
- h) the hubs would have sufficient pupils to guarantee financial viability in the future
- i) there would be greater economies of scale when commissioning health and care services
- j) proposals allow for £7.5m to be spent on upgrading the remaining sites
- k) proposals that merge special provision reflect newer successful models of best practice around the country, including that in neighbouring LAs.

6.4. The LA has considered the views expressed carefully and acknowledges that where there was positivity about the principles and vision for the new model of provision, anxieties remain about operational detail. Where real concerns exist, every effort will be made to mitigate these, so that there is no negative impact on pupil outcomes.

6.5. As a result of the feedback from the consultation, the LA has reconsidered the detail of the proposals and has made two changes in the recommendations going forward:

- (i) Extending the upper age range of the west and SEMH hubs from 18 to 19, to create parity across the city
- (ii) Changing the designation of the east and west hubs from 'learning difficulties' to 'severe and complex learning difficulties'

6.6. The principles behind the proposal to create three integrated hubs from our current provision as outlined in this report have the support of:

- The four governing bodies concerned – Hillside, Downs View, Homewood College and the CDP Federation (Cedar Centre, Downs Park and Patcham House)
- The management committees of the two PRUs – Brighton and Hove PRU and the Connected Hub
- The headteachers of Hillside and Downs View Schools and the Acting Executive Headteacher of the CDP Federation
- The Clinical Commissioning Group (specifically community paediatrics and children's mental health).

- The Parent Carers' Council (PACC)
- 6.7. The LA is therefore now recommending to Members that agreement is given to proceed with the publishing of statutory notices in respect of the recommendations set out in paragraph 2.1-2.3 above.
- 6.8. Copies of the draft proposed statutory information documents and statutory notices are attached as appendices to this report.

7. OTHER AREAS OF THE REVIEW

- 7.1. A feasibility study on the relocation of specialist early years provision, currently based at the Jeanne Saunders Centre and Easthill Park, on to the Tarnerland site has been commissioned. Tarnerland is in the centre of the city and is committed to considering this provision as part of their core offer.
- 7.2. The planned merger of the Connected Hub and the Pupil Referral Unit has formed part of the current consultation, although it does not require a statutory notice to achieve the change in model. Negotiations between the governors of Homewood College and members of the management committees are already underway to establish future working arrangements. The plan remains to make the proposed changes to Homewood College, to merge the two existing PRUs into one, and operate both provisions under the oversight of an executive Headteacher of the SEMH hub.
- 7.3. An action plan is guiding the work of a post 16 working group to ensure our post 16 and post 19 offers are robust, integrated and will enable appropriate provision to be made within the city and thus help avoid agency placements.

8. FINANCIAL AND OTHER IMPLICATIONS

8.1 Financial implications

The recommendations included in this report have implications to both revenue and capital funding.

The proposals state that the intention is to retain at least the same number of specialist placements for children with SEN and disabilities but to re-structure and re-organise provision. This approach will safeguard Dedicated Schools Grant (DSG) high needs block funding levels whilst, at the same time, delivering greater economies of scale resulting in reduced unit costs.

As a consequence of a higher than average number of special schools, there are inevitable additional cost associated with infrastructure and leadership and management, which could be managed more efficiently by consolidation of provision. While some special schools are consistently over-subscribed, others have struggled to admit enough pupils to be financially viable without LA additional support. As a consequence of falling rolls for some special schools, the LA has had to find just over £1.1m in 'transitional protection' over the past five years to purchase empty places in these schools and enable

them to balance their books. While we need our special provision to be financially viable, 'financial protection' is in reality much needed money that could have been used to meet the needs of children with SEN elsewhere. Under the current system funding follows individual pupils in 'real time' and thus it is difficult for schools to be financially viable unless they can fill all their commissioned places and are of a sufficient size to withstand inevitable movements of pupils in and out of the school across the year, and deliver the economies of scale required to remain viable. As previously stated, the status quo is not an option there are budget deficits across a range of special provision. The total deficits across just 3 establishments at the end of the 2016/17 financial year totalled £452,000, which can no longer be netted off against historic balances or bridged by additional funding from the LA.

In particular, the plan to integrate provision will facilitate savings in revenue budgets relating to management and administration, and premises. Analysis of special school budget plans for 2016/17 identified approximately £2.9m is currently spent in these areas and the proposals in the report seek to save £700,000 over a multi-year period starting in 2017/18. However, the proposed savings to be achieved to ensure that funding is used more effectively and efficiently so that the city's special provision is sustainable, will be aligned to the co-location of schools and this is critical in terms of the timing of savings. The reduction in costs and integration of provision will mean that the unit values for top-up funding in special schools will need to be reviewed and applied in accordance with the Government's operational guidance and the Schools and Early Years Finance Regulations.

It is anticipated that the closure of Patcham House will generate a saving of approximately £140,000 meaning that there would be a balance of approximately £560,000 - this represents 5% of the existing total special school budgets. A significant part of this would then be reinvested directly back into the Hubs in the form of increased therapy provision to improve the holistic education, health and care offer.

The proposal to integrate provision for children and young people with an Education Health and Care plan will allow more effective use of resource across the Council's general fund, the DSG and joint-commissioning with partners in health. It will be necessary to ensure that the proposals are compliant with the relevant funding regulations, particularly should DSG funding be extended to support provision currently being delivered through core council funding.

In order to facilitate the necessary property changes a sum of £7.5m has been set aside in the capital programme to support the SEND review. The disposal of any surplus assets identified under this review may potentially generate capital receipts. Those receipts, less any disposal costs, will be ring-fenced to support capital investment through the Council's Capital Investment programme to enable the adaptations and improvements to the new provisions. The balance of receipts after the initial ring-fencing will be used to support the Council's future corporate capital strategy.

8.2 Legal Implications

In order to achieve any reorganisation of provision the council must comply with School Organisation legislation - the Education and Inspections Act 2006 (EIA), associated regulations, and statutory guidance published by the Department for Education. Both the legislation and guidance set out the steps which the council must take before making any final decisions on proposals to reorganise school provision.

The Integrated Hubs

A formal consultation has now been carried out with all interested parties regarding the closure of Downs Park and Cedar Centre Special schools and the expansion and redesignation of Hillside and Downs View Special schools. If the decision is taken to proceed with the proposals following this consultation, statutory notices must be published. There will then follow a period of 4 weeks within which any person may comment or object to the proposals. At the end of this representation period a final decision on the proposals will need to be taken by the Children Young People and Skills committee within two months. It is anticipated that this will be at the committee meeting on 18 September 2017.

Integrated Hub for Social Emotional Mental Health needs

In order to create the new hub the Local Authority is proposing to expand the current provision at Homewood College, merge the two existing PRUs into one, and operate both provisions under the oversight of an executive Headteacher.

Expansion of site and extension of age range at Homewood College

The necessary consultation exercise has been carried out and if the decision is taken to proceed with the proposals the Local Authority must now publish statutory notices. The procedure is the same as for the Integrated Hubs as set out above.

It is not necessary to follow the same statutory processes set out in school reorganisation legislation to achieve a merger of the two PRUs, as PRUs do not come within the definition of maintained schools, and are not therefore within the scope of the legislation. The Local Authority has however fulfilled its obligation to carry out a consultation exercise on the proposed merger. It is anticipated that a final decision will be taken at the CYPS committee on 18 September 2017.

8.3 Equalities implications

The proposals which are the subject of this report are based on a vision for improving the provision and outcomes for children requiring specialist provision and their families. By integrating education, health and care more

fully and providing enhanced short breaks, respite and family support, proposals are aimed at avoiding family stress and breakdown where children have the most complex needs and challenging behaviours and enabling children and young people with SEND to achieve their potential.

An Equalities Impact Assessment was compiled at an earlier stage of the LA's review of the city's services for children and young people with SEND and their families. It has been updated as the review has progressed towards more specific proposals for change.

8.4 Sustainability implications

The objective of the redesign of the city's special provision is to consolidate provision so that it is more financially secure, can be more flexible in meeting changing needs and makes the best use of resources and facilities, thus achieving greater sustainability into the future.

8.5 Public Health implications

The intentions of the recommendations in this report are to improve the health and well-being of children and young people and their families through greater integration of services and provision, alongside more resources to provide home support to families to manage complex needs and behaviour. This should improve mental and physical health and well-being of families as a whole.

SUPPORTING DOCUMENTATION

Appendices:

1. Journey of the review
2. Feedback on the formal consultation phase re the proposal for the creation of three Integrated Hubs
3. Statutory information and statutory notice for the expansion re-designation and extension of age range for Hillside Community Special School and the closure of Downs Park Community Special School
4. Statutory information and statutory notice for the expansion and re-designation of Downs View Community Special School and the closure of Cedar Centre Community Special School
5. Statutory information and statutory notice for the expansion and extension of age range for Homewood College

Documents in Members' Rooms

1. None

Background Documents

1. None

Appendix 1

The journey of the review

In 2014 the local authority undertook a broad review of existing provision for children and young people with special educational needs and disabilities with the community, including, pupils, parent/carers, schools, education, health and care professionals, all strategic partners and the voluntary and charity sector. The LA has an ongoing responsibility to keep its provision under review, and has already made some changes in response to the new Children and Families Act 2014. There have been a number of milestones as the review has progressed towards more specific proposals for change and the review's journey is outlined here:

February 2015

Joint Children & Young People Committee and Health and Wellbeing Board -

The committee approved the recommendations arising from the wide ranging review of special educational needs and disability in the Children's Services Directorate of the council.

July 2015

Health and Wellbeing Board & Children Young People and Skills Committee -

The board and committee approved the proposal to merge the Special Educational Needs and Disabilities (SEND) Review in Children's Service and the Learning Disability (LD) Review in Adult Services.

November 2015

Joint Children & Young People Committee and Health and Wellbeing Board -

The joint meeting of the Health and Wellbeing Board and Children, Young People and Skills Committee on 10 November 2015 gave approval for an engagement process with key stakeholders around proposals to integrate education, health and care provision in special schools and Pupil Referral Units.

January 2016

Children, Young People and Skills Committee - The committee approved the proposed timeline for the engagement process and subsequent actions to reorganise special provision for children with complex needs.

June 2016

Children, Young People and Skills Committee - The committee noted the results from the open engagement phase on special provision and approved the governance arrangements and an updated timeline for taking forward proposals.

October 2016

Children, Young People and Skills Committee The committee agreed that the proposals that are the subject of this report should go out to formal consultation, including lowering the age range of Hillside and Downs View Community Special Schools and the proposed closure of Patcham House Community Special School.

January 2017

Children, Young People and Skills Committee - The committee agreed to publish statutory notices to extend the age range of Hillside and Downs View Community

Special Schools. A further period of engagement about the structure of the new hubs began.

March 2017

Children, Young People and Skills Committee- The committee agreed to the extension of the age range of Downs View and Hillside Community Special Schools to enable them to admit pupils from the age of two. Agreement was given to publish statutory notices in respect of the proposed closure of Patcham House Community Special School. A period of formal consultation was approved on the proposals to create three new hubs, two for those with learning difficulties and one for those with social, emotional and mental health needs.

All planned changes are due to be incrementally implemented from September 2018 and will be completed by July 2020. This extended timescale will ensure minimum disruption to pupils already in the system.

Appendix 2:

Special Schools & Pupil Referral Units Reorganisation

Feedback on the formal consultation phase on the proposals for the reorganisation of the city's Special Schools and Pupil Referral units to create three Integrated Hubs

1. Introduction

The Local Authority conducted a formal consultation in respect of 4 elements of the Reorganisation of Special provision in Brighton and Hove. The period of consultation ran from 15th March until 9th May 2017. This report provides information about the process of the formal consultation and summarises the feedback on the proposals gathered during that period related to Downs View, Cedar Centre, Hillside, Downs Park, Homewood College, Pupil Referral Unit and Connected Hub. All feedback from the consultation period will be included as part of papers presented to June 2017 Children Young People and Skills Committee.

2. What was this consultation about?

This phase of consultation focussed on the following proposals:

- A proposal to expand, re-designate and extend the age range up to the age of 18 years for Hillside Community Special School and to close Downs Park Community Special School to form the integrated hub for learning difficulties in the west of the city.
- A proposal to expand and re-designate Downs View Community Special School and close the Cedar Centre Community Special School to form the integrated hub for learning difficulties in the east of the city
- A proposal to create an integrated hub for pupils with social, emotional and mental health needs by merging the two Pupils Referral Units (PRUs) and bringing them together with Homewood College under the oversight of an executive Headteacher. The proposal is to expand the pupil numbers and site of Homewood College and extend the age range of pupils from 11-16 years to 5-18 years.

3. Consultation process

3.1 This phase consultation began on 15th March 2017, after the Children Young People and Skills Committee approved the process and timeline for this stage. This included:

- A bespoke consultation plan for the proposals, to ensure that stakeholders have the opportunity to participate. This included meetings:
 - for staff and parents at each one of the affected schools
 - for pupils with SEMH
 - a parents' event arranged by Amaze

- with Health and Social Care colleagues
- coffee mornings arranged by Amaze
- Publishing a formal consultation paper with key questions to consider

3.2 The consultation was promoted through:

- The council website
- Social media
- The Local Offer
- The schools' bulletin
- The Wave
- Partner organisations' own internal communication channels
- Amaze and Parent Carers' Council communications with parents
- School newsletters and their other communication channels

3.3 Feedback was invited:

- via the Council's consultation portal
- via email,
- in writing
- and by leaving a voicemail on a consultation line
- via personal telephone contact

3.4 For all proposals, respondents were asked a total of eight questions (sub divided into three) and were offered the opportunity to add their specific comments at the end of each question and more generally at the end of the consultation questionnaire.

3.5 Throughout the consultation period we reviewed the number and range of responses in order to make sure that all groups were represented. Any groups that were under represented were contacted and reminded of the ways to respond to consultation.

3.6 Process for analysing responses

3.6.1 To analyse results volunteer representatives from the Parent and Carer Council and Amaze joined officers to review the feedback from the online consultation using an agreed framework to identify themes and record significant issues for further consideration.

3.6.2 The information provided as part of this report is separated into online consultation responses, emails, voicemails and summarised notes from consultation events.

4. Feedback submitted on the consultation proposals

4.1 Respondents were encouraged to participate via the council's online portal but were also able to respond via email or a voicemail service. Both the email and the voicemail service were specifically created for SEND Review consultations and will continue to be open for the length of the review.

- 4.2 Over 300 people attended the consultation events.
- 4.3 211 responses were submitted in total 203 via the online portal, seven separate submissions and one voicemail.
- 4.4 One of the additional responses answered each question in turn and has been combined with the online portal comments as a result. The remaining six gave an overview of all of the proposals and as a result have been summarised separately in the tables below each question
- 4.5 The online portal asked respondents whether they were representing an organisation or group and 13 acknowledged this. However, all responses have been totalled up and included below

Please tell us in what capacity you are responding?		
		Frequency
Valid	No response	5
	As yourself	193
	Representative of a organisation or group	13
	Total	211

- 4.6 There has been a wide range of respondents and this is demonstrated in the chart below.

In what capacity are you responding		
	Frequency	Percent
Special and Mainstream school staff	84	39.8%
Local Authority staff e.g. SEND professionals, social workers	29	14.3%
Parent / carer of a pupil(s) at one of the affected schools	25	12.3%
Resident	10	4.9%
Governors	9	4.4%
Prospective parent / carer of a pupil(s) at one of the affected schools	7	3.4%
Children and young people	4	2.0%
Sussex Community NHS Foundation Trust	5	2.5%
Sussex Partnership Foundation trust	4	2.0%
The Clinical Commissioning Group	3	1.5%
Further education colleges	1	.5%
Public Health	1	.5%
Community & Voluntary Sector organisations	1	.5%
Other	19	9.4%
No response	2	1.0%
Additional open response	7	3.4%
Total	211	100.0

4.7 The groups represented included; Children & Young People, Parents & Carers, Special & Mainstream Schools and Sussex Community Trust.

Name of group		Frequency
	Clinical Commissioning Group	2
	Downs Park School	2
	Downs View School	2
	Fostering Service	1
	Governing Body of Downs View School	1
	Hillside School	1
	Hillside School Governing Body - 14 People	1
	Management Committee BHPRU	1
	No response	2
	Total	13

5.1 Consultation Information - Question 1

Background

Downs View is a registered community special school which currently makes day provision for boys and girls aged 3-19 with severe and profound and multiple learning difficulties/complex needs. Downs View has two sites, a school site in Woodingdean for those up to the age of 16, and Downs View Link College in Surrenden Road. The School serves mainly, but not exclusively, the east of the city and all pupils have a Statement of special educational need or an Education, Health and Care Plan.

Cedar Centre is a registered community special school which currently makes day provision for boys and girls with complex needs aged 4-16. The school serves mainly, but not exclusively the east of the city and all pupils have a Statement of special educational need or an Education, Health and Care Plan.

The proposal is to merge Downs View School and Cedar Centre to create the new integrated hub in the east of the city.

Question

a) Do you agree or disagree in principle to the creation of an integrated hub in the east of the city for pupils aged 2-19 with learning difficulties?

b) In order to form the new integrated hub, do you agree or disagree that we should merge Cedar Centre community special school and Downs View community special school by closing the Cedar Centre and expanding and re-designating Downs View for children and young people aged 2-19 with learning difficulties in the east of the city?

Summary of online response

Question 1a

204 responses were made to this question.

- 88 (43%) respondents either tend to agree or strongly agree
- 86 (42%) respondents either tend to disagree or strongly disagree
- 30 (15%) were either don't know/not sure, neither agree or disagree or no response

95 (47%) out of those added a comment to reinforce their answer to question 1a and the summary of themes has been included in the committee paper.

Question 1b

204 responses were made to this question.

- 77 (38%) respondents either tend to agree or strongly agree
- 89 (44%) respondents either tend to disagree or strongly disagree
- 37 (18%) were either don't know/not sure, neither agree or disagree or no response

88 (43%) out of those added a comment to reinforce their answer to question 1b and the summary of themes has been included in the committee paper.

Summary of separate submissions

The separate submissions noted the high standard of provision at both Special Schools and the comments matched those submitted in the online responses but with more detail and specific questions related to their subject area.

They could see the benefits of the move to Integrated Hubs and the financial prospects that would bring but they did seek more clarity on the day-to-day impact on the pupils attending the new provision.

Notable positives in the expansion of an 'outstanding' provision at Downs View and that it made logical sense for that provision to be expanded.

The separate submissions highlighted some other positives that were not included in this round of consultation but had been previously;

- Investment in therapy at each of the hubs
- Additional support to parents
- Multi agency working in the new provision

The concerns matched those identified in the online responses;

- Logistics – Transport, traffic and sites
- Range of pupils needs
- Size of school

Key Quotes

“This is a great idea. It will enable the council to be able to make the best use of its money, and will help the headteacher of the new hub provide what pupils need in a more holistic way.”

“The children attending these 2 schools actually have very different educational needs and it is not appropriate for either set of children for anyone to attempt to integrate their schooling needs, they each need to remain within their own currently highly specialised areas of expertise.”

“It feels very sad to lose Cedar Centre which has such a positive ethos. However, on balance I feel this is the right decision. There is the big advantage that the school will go to 19, so will cater beyond 16 for young people who currently attend the Cedar Centre.”

“In theory it sounds promising, in practice I see it costing a lot of money to make this happen which would have been better spent on the actual service as it is.”

“Reducing the already limited choice of schools available to children and their parents.”

“The reason I have put that I neither disagree nor agree is because I have yet to get an idea of what the merge actually means for the school my son attends.”

“Both schools cater for very different disabilities. Downs View appears to be quite a large school and Cedar Centre is a relatively small school.”

“The city’s special schools are high quality but there are too many of them and they are generally too small, compared to those elsewhere in the country.”

“Opportunities for sharing resources and good practice and the extended day to support families.”

“It makes sense to use the reputation and capabilities of Downs View to lead the new Hub - an excellent school with a history of research, leadership and innovation within the special schools community.”

“I do not think such a diverse group can be educated in a ‘hub’. Students with challenging behaviour alongside those who are very vulnerable both physically and emotionally.”

“There is provision for learning difficulties but no provision for autistic children who require a different and targeted approach.”

5.2 Consultation Information – Question 2

Background

Hillside is a registered community special school which currently makes day provision for boys and girls aged 4-16 with severe and profound and multiple learning difficulties/complex needs. The school serves mainly, but not exclusively, the west of the city and all pupils have a Statement of special educational need or an Education, Health and Care Plan.

Downs Park is a registered community special school which currently makes day provision for boys and girls aged 4-16 with complex needs. The school serves mainly, but not exclusively the west of the city and all pupils have a Statement of special educational need or an Education, Health and Care Plan.

The proposal is to merge Downs Park school, and Hillside school to create the new integrated hub in the west of the city.

Question

a) Do you agree or disagree in principle to the creation of an integrated hub in the west of the city for pupils aged 2-18 with learning difficulties?

b) In order to form the new integrated hub for children and young people aged 2-18 with learning difficulties in the west of the city, do you agree or disagree that we should

(i) Merge Downs Park community special school and Hillside community special school by closing Downs Park and expanding and re-designating Hillside, and retain both sites?

(ii) Extend the age range of the new integrated hub up to 18

Summary of response

Question 2a

204 responses were made to this question.

- 86 (42%) respondents either tend to agree or strongly agree
- 91 (45%) respondents either tend to disagree or strongly disagree
- 27 (13%) were either don't know/not sure, neither agree or disagree or no response

97 (48%) out of those added a comment to reinforce their answer to question 2a and the summary of themes has been included in the committee paper.

Question 2b i)

194 responses were made to this question.

- 69 (36%) respondents either tend to agree or strongly agree
- 87 (45%) respondents either tend to disagree or strongly disagree
- 38 (20%) were either don't know/not sure, neither agree or disagree or no response

82 (42%) out of those added a comment to reinforce their answer to question 2b i) and the summary of themes has been included in the committee paper.

Question 2b ii)

192 responses were made to this question.

- 105 (55%) respondents either tend to agree or strongly agree
- 53 (28%) respondents either tend to disagree or strongly disagree
- 34 (18%) were either don't know/not sure, neither agree or disagree or no response

82 (43%) out of those added a comment to reinforce their answer to question 2b ii) and the summary of themes has been included in the committee paper.

Summary of separate submissions

The separate submissions generally grouped the questions together and as a result it is difficult to separate out the themes between question 1 and 2.

Specifically for question 2 b ii) there were mixed responses about the parity of provision up to age of 18 in East & West of city. Some respondents felt that this was a good thing and increased options to parents, encouraging some to stay in the city rather than the expensive out of city placements. Others felt that there was enough provision in the city already and that should be expanded.

Key Quotes

"An exciting opportunity to at least maintain but hopefully improve upon education and opportunity for all SEN pupils on the West of the city. Where budgets come under ever increasing pressure this will help make both the schools financially viable 5/10 years down the road."

"Must be parity in the city otherwise one hub will be more inviting than the other and this will help pupils that don't naturally fit into the link college."

“I don't think it will be beneficial to any of the children to be merged together, the site will have to be huge, the children have very different needs.”

“I think both sites should definitely be retained. I'd like to know more about what this means for Downs Park pupils if it were to become part of Hillside.”

“Given the choice, I would rather keep the schools as they are, however I realise that small schools are not financially viable and budgets are tight, also that the LA has to fund special education up to 25 with no additional budget - therefore savings need to be made.”

“It would not make strategic sense to close an Outstanding school in the city. Both sites are needed to continue to meet the needs of the pupils.”

“Both schools needs are very different.”

“Currently both schools offer good provision and meet the needs of their cohort well. I can't see how this will be enhanced through a merger.”

“Need to ensure that each school retains strong leadership and management as well as staffing levels.”

“Currently there is limited provision for ASC pupils with complex needs who are vulnerable but don't get into DVLC. These pupils need transport and a full week timetable, colleges seem unable to provide this.”

“I think age range should definitely cover up to age 18 as this will offer greater opportunities for our SEND children to learn and help parents as there is a gap to cover when the children finish school at 16.”

“Downs Park and Hillside provide different education models for the children currently at the schools. By merging them would there still be education models which suit all children.”

5.3 Consultation Information – Question 3

Background

Homewood College is the city's special school for children and young people aged 11-16 with social, emotional and mental health needs. All pupils have a Statement of special educational need or an Education, Health and Care Plan.

The Pupil Referral Unit is provision for those students who have been excluded from school or who are at risk of exclusion. It caters for pupils aged 5-16. It is currently based across sites at Lynchet Close and Dyke Road.

The Connected Hub is also Pupil Referral Unit provision specifically for those Y11 students who find it difficult to engage with a mainstream school's regular curriculum. It is based at Tilbury House, Florence Place.

Question

a) Do you agree or disagree in principle with the creation of a new citywide hub for children and young people aged 5-18 with a range of social, emotional and mental health needs?

b) In order to form the new integrated hub for children and young people aged 5-18 with social, emotional and mental health needs, do you agree or disagree that we should

i) Merge the Pupil Referral Unit and the Connected Hub?

ii) Extend the age range of Homewood College from 11-16 to 5-18

Summary of response

Question 3a

196 responses were made to this question.

- 76 (39%) respondents either tend to agree or strongly agree
- 73 (37%) respondents either tend to disagree or strongly disagree
- 47 (24%) were either don't know/not sure, neither agree or disagree or no response

82 (42%) out of those added a comment to reinforce their answer to question 1a and the summary of themes has been included in the committee paper.

Question 3b i)

189 responses were made to this question.

- 70 (37%) respondents either tend to agree or strongly agree
- 68 (36%) respondents either tend to disagree or strongly disagree
- 51 (27%) were either don't know/not sure, neither agree or disagree or no response

45 (24%) out of those added a comment to reinforce their answer to question 1b and the summary of themes has been included in the committee paper.

Question 3b ii)

188 responses were made to this question.

- 78 (42%) respondents either tend to agree or strongly agree
- 55 (29%) respondents either tend to disagree or strongly disagree
- 55 (29%) were either don't know/not sure, neither agree or disagree or no response

45 (24%) out of those added a comment to reinforce their answer to question 1b and the summary of themes has been included in the committee paper.

Additional Responses

The separate submissions generally focussed on question 1 & 2 in responses with limited response on SEMH specifically.

There was some acknowledgement of the investment in SEMH and how this has been underinvested in over a number of years. Good to build a model specialising in SEMH and focussing resources in this area

Key Quotes

“I can see benefits for the running of the schools as a joint Hub for budget reasons and for providing good governance.”

“Social, emotional and mental health covers a huge range of different types of needs, and pupils need different approaches, depending on their particular need. Putting them all on one site is not a good idea, so it is good to hear that several sites will be used.”

“In my experience, once children go to the PRU, there is often little chance of re-integration and acceptance into school.”

“This is a more cohesive set of pupils and needs, and the provision will be spread across the city, so this seems to make more sense.”

“Never understood why these were kept separately in the first place. Good idea to bring them together.”

“Upping the age limit is a great idea. These children need much more support.”

“I agree with the principles however am concerned about the management of the service and would like the PRU and special school elements to remain firmly separate from a budgetary perspective.”

“The very specific needs of autistic children must be catered to separately.”

“The age range is massive and will throw up difficulties in meeting all needs well enough to be therapeutic.”

“From the age of 5, young people will now learn negative behaviours from the older children, at the primary PRU they are currently protected from this and thus not learning from older pupils while at school negative behaviours.”

“It very much depends on the design. The main reason for restructure is because the current system is not working in parts, there needs to be an aspiration for something more positive, and I am concerned that it will be more of the same.”

“Opportunity for greater economies of scale. Opportunity to provide fully integrated support. I have concerns around primary provision in particular - currently we operate a one size fits all system which works very well for 80% of our pupils but, in my opinion, is not meeting the needs of the highest need primary pupils.”

Appendix 3

Brighton & Hove City Council

Statutory Notice: Proposals to discontinue Downs Park Community Special School and to change the age range, enlarge the capacity and redesignate Hillside Community Special School

Notice is given in accordance with the Education and Inspections Act 2006 ("the Act") that Brighton & Hove City Council, ("the Local Authority"), Hove Town Hall, Norton Road, Hove, East Sussex BN3 3BQ intends to implement the following proposals:

Part 1: Discontinuation of Downs Park Community Special School, Foredown Road, Portslade, Brighton BN41 2FU so that a combined hub offering improved integrated education and health and care offer can be created.

In accordance with section 15(1) of the Education and Inspections Act 2006 the Local Authority proposes to discontinue Downs Park Community Special School with effect from 31 August 2018.

It is intended that pupils attending Downs Park Special School at the time of closure will be offered places in Hillside Special School which, subject to Part 2, will change its age range and enlarge its capacity, becoming the integrated hub from 31 August 2018.

This proposal will only take effect in conjunction with the proposals set out in Part 2. Neither part will be implemented separately.

Part 2: Prescribed changes to Hillside Community Special School, Foredown Road, Portslade, Brighton BN41 2FU from 1 September 2018 to create the integrated hub.

In accordance with section 19(1) of the Act it is intended to make the following prescribed alterations to Hillside Community Special School:

- (i) Change the age range of the school by a year or more
- (ii) Enlarge the capacity of the school
- (iii) Change the SEN designation to 'severe and complex needs'

The current age range of the school is 2-16. The Local Authority proposes to extend the age range so that the school can provide for pupils up to the age of 19. Hillside is currently registered for 72 pupils. It is proposed to increase the capacity of the school to 200 which would include the number of registered places at Downs Park Community Special School. It is proposed that the increase in capacity will be achieved by utilising the premises of the former Downs Park Community Special School that is located within 250m of Hillside Community Special School. It is also proposed that Hillside Community Special School will change its name.

This Notice is an extract from the complete proposal. Copies of the complete proposal can be obtained from: Edd Yeo at Brighton & Hove City Council, Hove Town Hall Norton Road, Hove BN3 3BQ or by contacting him on 01273 294354 or via email at edd.yeo@brighton-hove.gov.uk. The Full Proposal is also on the Local Authority's website and can be found at <http://www.brighton-hove.gov.uk/statutory-notice>

Within four weeks from the date of publication of this proposal (i.e. by 28 July 2017), any person may object to or make comments on the proposal by sending them to Regan Delf, Assistant Director Health, SEN and Disability, Brighton & Hove City Council, Hove Town Hall Norton Road Hove BN3 3BQ or via email to regan.delf@brighton-hove.gov.uk

Signed: Pinaki Ghoshal

Publication Date: 30 June 2017

Full statutory proposal information for proposed changes to Hillside Community Special School and Downs Park Community Special School

1. In accordance with sections 15 (1) and 19(1) of the Education and Inspections Act 2006 Brighton & Hove City Council proposes to enlarge the capacity, extend the age range, and change the SEN designation of Hillside Community Special School with effect from 1 September 2018 and proposes to discontinue Downs Park Community Special School with effect from 31 August 2018.

1.1 Local Authority (LA) details

Brighton and Hove City Council
Hove Town Hall
Norton Road
Hove BN3 3BQ

1.2 School details

Hillside Community Special School
Foredown Road
Portslade
Brighton BN41 2 FU

Downs Park Community Special School
Foredown Road
Portslade
Brighton BN41 2FU

- 1.3 Hillside is a registered Community Special School which makes day provision for boys and girls aged 2-16 with severe, profound and multiple learning difficulties. It is rated as outstanding by Ofsted. Downs Park is a registered Community Special School which makes day provision for boys and girls from age 4 to 16 with complex needs. It is rated as good by Ofsted. Currently there are 77 places commissioned at Hillside and 95 places commissioned at Downs Park. All pupils at both schools have an Education, Health and Care Plan or a statement of special educational needs and come mainly, but not exclusively from the west of the city. Neither school has a religious character. Both schools lie on Foredown Road in Portslade.

Downs Park Community Special School currently is commissioned to manage specialist provision on the site of West Blatchington Community Primary school, a local mainstream primary school, on whose roll the pupils are registered. Neither that provision nor its future management form part of this proposal.

2. Implementation plan

- 2.1 These proposals are part of a redesign of the city's special provision and thus

linked to other proposals being made concurrently. In order to achieve the merger between Hillside and Downs Park schools to create the hub in the west of the city, the LA is proposing to:

- discontinue Downs Park Community Special School with effect from 31st August 2018
- change the designation of Hillside school with effect from September 2018 to 'severe and complex learning difficulties' to reflect the wider range of learning difficulties and complex needs in the new hub
- extend the age range of Hillside school from 2-16 to 2-19 years of age
- enlarge the capacity of Hillside school to 200 to include the number of registered places at Downs Park school

Both sites will be retained and used for the new hub. These two proposals are linked proposals and the Local Authority will either implement both proposals, or neither. There will not be an instance where one proposal would be implemented on its own.

3. The objectives of the proposals

3.1 All LAs have a statutory responsibility to keep SEND provision under review, in order to be able to ensure that provision is able to meet the needs of children and young people with SEND and is sustainable into the future. The LA believes that the changes proposed will enhance the standard, range and quality of the city's special provision, which is all currently judged as good or outstanding. Downs Park and Hillside are two of the city's six special schools. In 2014, Brighton & Hove City Council conducted a wide ranging review of its services for children with special educational needs and disabilities (SEND), which concluded that the LA should move towards developing more integrated and flexible services to provide for the holistic needs of those with SEND and their families and in doing so, could make better use of existing resources. The LA intends to maintain the existing number of special school places across the city, although these will be distributed across fewer provisions.

3.2 These proposals:

- are based on a vision to improve the integrated education, health and care offer for our most vulnerable young people
- re-design our existing six special schools and two Pupil Referral Units into three 'hubs' offering enhanced education, health support and extended day provision on one site
- maintain the number of special school and PRU places available across the city
- consolidate provision so that it runs more efficiently and more sustainably into the future.

4. The decision making process

4.1 The journey of the review

There have been a number of milestones as the review has progressed towards more specific proposals for change across the city: Further details

can be found in the committee report in Appendix 1.

4.2 Governance and participation

The integrity of this SEND review was overseen by a high level strategic Governance Board, and included parent/carers and young people, in line with the Local Authority's commitment to engage parents and young people effectively at all levels of strategic and decision making forums. During the life of the review, project groups were formed to cover the following areas:

- Learning difficulties (LD)
- Social emotional and mental health (SEMH)
- Early years (EY)
- Post 16 provision

Each group consisted of a broad range of stakeholders who would be affected by the changes in some way and who together had a breadth of expertise and experience to support the LA in its intention to co-produce specific options for change on which to formally consult

4.3 Formal consultation on the creation of the hubs across the city, including the proposal to create that for the west of the city by merging Hillside and Downs Park schools through the expansion , extension and redesignation of Hillside school and closing Downs Park school

At their meeting on 6 March 2017 the Children, Young People and Skills Committee agreed to proceed with a formal consultation on proposals to create the new hubs, which included a proposed hub in the west of the city, formed by merging Hillside and Downs Park schools. The proposal would require the expansion, extension and redesignation of Hillside school and the closure of Downs Park school. The consultation was conducted through a range of events for parent/carers, young people, education, social care and health staff and voluntary organisations alongside the opportunity for views to be submitted via the council's online consultation portal. The consultation period ran from 15 March to 9 May 2017.

Analysis of the feedback on the consultation of the hubs across the city can be found via Appendix1.

The feedback received online and via the consultation events covered the creation of hubs across the city. Thus the following summary in section 5 covers both the proposals relating to Hillside and Downs Park, as well as the proposals for change relating to the redesign of special provision across the city.

5. Summary of the main issues raised, with responses

5.1 The prospect of change

Parents were generally very happy with the current provision made for their child's needs and appreciated the high quality of the city's special provision ,

which are all rated good or outstanding by Ofsted. Any change that might disrupt this caused some parents and staff anxiety. However, maintaining the status quo is not an option as the city's large number of very small schools is not financially sustainable. The level of commitment from senior leaders to continuing to build on the quality offered at the moment to make the best possible provision in the future for the city's most vulnerable children and young people acknowledges the views of those who urged change and offers reassurance that the existing quality will at least be maintained or enhanced. The existing governing bodies have begun to work together in different groupings, so that the transition from one model to another is as smooth as possible for everyone. This should mitigate the concerns expressed that the mergers would result in a 'take over' of one school over another to the point of domination.

Both the LA and the governing bodies have been keen to emphasise that the hubs will be deemed new organisations and the ethos developed with the shared perspective of school leaders, staff, parents and pupils. The council has agreed a long lead in time for any changes, as it is proposed that the hubs come into being on September 2018 and changes will be introduced over a number of years to minimise disruption for individual pupils. In some instances, ie the Pupil Referral Units, pupils were not always in agreement with their parents and welcomed the prospect of change, particularly new facilities and a wider curriculum offer. The proposal to increase post 16 opportunities received very positive feedback.

5.2 The level of detail

Although they recognised that this consultation focussed primarily on the model of provision and its legal framework, some respondents felt that they would have liked more detail about how the hubs might work on a day to day basis to be confident that they would be able to provide effectively for the needs of pupils and families. Governors and senior leaders attended the consultation meetings with parents and were able to give reassurance not only that they would want to retain the best of what currently exists and plan any changes sensitively and over time, but also that they were committed to involving parents in taking the hubs forward, so that what is provided in the future for pupils and their families is tailored to their needs. The LA would ensure that senior leaders have the feedback from the consultation so that they can use this to frame their early thinking and talk further to staff and families in the spirit of engagement and co-production.

5.3 Impact on pupils

Whilst there was some anxiety about the impact of changes to schools with which pupils are already familiar, the development of hubs will broaden what they can offer to pupils within the learning curriculum and in their social and personal development. The continuing need for programmes tailored to the needs of individuals, with a particular focus on personalised learning styles was considered important to ensure that pupils maximise their potential. There was support for the new provision to be introduced over a period of time, as it

was agreed that this would minimise disruption for pupils. The vast majority of pupils will remain on their current site with familiar staff. Where the needs of individual pupils might necessitate some changes, then this will be managed sensitively with a personalised plan for each pupil. Downs View School has had recent experience of a significant building work project adjacent to the school which was managed effectively to keep noise to a minimum and minimise any impact on pupils. The school's senior leaders were able to offer reassurance to parents that building work to extend the school or refurbish existing buildings would be managed similarly.

5.4 The size of the new hubs

Many parents liked very small schools and were keen to retain the personalised approaches that current provision is able to offer. The importance of continuing to tailor provision to the needs of individuals was a clear message in the consultation feedback and school leaders were able to explain that this approach, proven to be effective, would be maintained. Some respondents were very supportive of the council's rationale for creating larger organisations which could operate more flexibly and make the best use of resources. Strategic leaders in particular acknowledged that even at the new pupil numbers, they would not constitute large schools, compared to both similar provision in neighbouring LAs and the national picture and would offer exciting opportunities to do things differently.

5.5 The combination of schools to create the hubs

Whilst recognising the need to create larger schools with greater opportunities for flexibility and efficiency, some respondents questioned the rationale for bringing together the schools in the combinations which the proposals put forward. A small number suggested alternatives, for example bringing together Cedar Centre and Downs Park, whose pupil populations were felt to be similar, alongside a merged Hillside and Downs View would be a preferred option. This had been considered at an earlier stage of the review debate but not favoured, as it limited parental choice further and did not make best use of the benefits arising from the geographical location of the existing schools. Cedar Centre and Downs Park have historically been part of a Federation of three schools, but this model has not enabled them to maintain an even balance of pupil numbers.

5.6 Inclusion

The proposal to bring together a wider range of pupils with special educational needs in one hub created considerable debate. Those who supported the concept of inclusion in its broadest sense had no problem with this. However, others did not want the pupils either across the whole age range or with different needs to mix together. There was a difference in opinion about the apparent disparity between the council's commitment to inclusion and the extension of the age ranges of the new provision, although it was recognised that this increased the options available to parents. Concern was expressed about how the admission of very young children, particularly to SEMH

provision, might lead to early 'labelling' of children, which was felt to be undesirable. Some parents were worried that resources might come under pressure by the demands of those with profound and multiple learning difficulties, or that the needs of those deemed less complex might be overlooked. Some health colleagues in particular suggested that the schools should be brought together according to need, rather than locality. However, the council continues to have a legal duty to meet the needs of all pupils with special educational needs and disabilities. There is confidence, based on the experience of other LAs who have developed similar provision that this can be achieved very successfully in schools with a wider range of needs. There are a number of ways in which this can be managed- by the creative use of sites, a range of groupings according to learning style, pupil need and social, emotional and communication issues. The city's current PRU provision for primary and Key Stage 4 is effectively managed on the same site, but with separate accommodation and entrances, and offers one model of using sites creatively. Some parents who have opted to educate their children with very complex needs in mainstream were keen that consideration be given to them being able to access the wider range of services which are planned to be developed within the hubs.

5.7 The breadth of the new provision

Some parents were anxious that the needs of those pupils on the autistic spectrum were not being sufficiently addressed within the proposed changes. The current special schools all have pupils with a diagnosis of autism and this will continue. The council also plans to develop a new Special Facility in a mainstream secondary school to enable the needs of those with a range of communication difficulties to be met. It is planned that this should open in September 2018. Additionally the LA is looking to create a small specialist unit within one of the hubs for the small number of more able pupils with autism/Asperger's syndrome, whose challenging behaviour or mental health needs mean that they cannot cope in a mainstream school. The LA acknowledged the view of some parents that a change in designation of Hillside and Downs View to the generic term of 'learning difficulties' may not reflect the full breadth of needs that the hub is intended to meet. Thus the proposed redesignation has been adjusted to 'severe and complex learning difficulties.' The hubs should be able to offer a wider range of curriculum opportunities than previously available through smaller schools and this is likely to result in a curriculum that is more tailored to the ability, needs and interests of pupils than ever before, including those on the autistic spectrum. Respondents were keen that a wide range of accreditation options would be available in the new hubs, so that individual students could explore their talents fully, and gain qualifications according to their potential. PRU pupils were particularly keen to access a wider and more creative curriculum than at present, with improved facilities, and the creation of the SEMH hub is intended to offer increased flexibility by giving specialist staff the opportunity for staff development to work across different cohorts.

5.8 Post 16 provision

This was an area of the consultation which solicited strong views. Most respondents were in favour of the proposal to extend opportunities for provision beyond the age of 16. However, there was a range of views about what this might look like and who could offer this provision. Existing providers of post 16 provision for those with the most severe and complex needs preferred that this provision should be expanded to retain a citywide provision for this cohort of students, although it was recognised that the numbers of students would exceed the capacity of the current building. There was considerable support from those mostly closely linked with the west and citywide SEMH hubs that the creation of post 16 provision elsewhere would enable there to be a broader range of models and thus offer different pathways to adulthood. It is intended that the new provision delivered via the west and citywide SEMH hubs should focus more on enhancing opportunities for those who could access local college courses or pathways to employment with the right level of specialist help, thus creating joint ventures with other providers. It was acknowledged that the original proposal created some inequality in the proposed age ranges for post 16 provision and the LA has addressed this in response to the views expressed during the consultation. The proposed age range for the SEMH and west hub is now extended to aged 19.

5.9 Integrated working

Meeting the holistic needs of pupils through working effectively together was rated as the one of the highest priorities at an earlier stage in the SEND review. Many respondents agreed that this would be a significant benefit of how the hubs would deliver what pupils need. The allocation of the proposed additional £300,000 across the three hubs for therapies and health services was welcomed. There was support for a greater role for school leaders in joint commissioning what services can be provided, and how they might best be integrated into the hub's core offer. Early work has begun with key partners to plan for any changes that might be necessary to secure joint planning and delivery of services.

5.10 Admissions

Some parents whose children do not currently attend their most local special school were anxious that they would be required to move their child to the hub closest to their home address. This consultation does not propose any changes to the admission arrangements to special provision. The LA would always look to place a child in their most local school, if that school is able to offer provision appropriate to a child's needs. However, parents still have a right to express a preference, and the LA is obliged to comply with that preference as long as it would not be unsuitable for the age, ability, aptitude or SEN of the child or young person, or the attendance of the child or young person there would be incompatible with the efficient education of others, or the efficient use of resources. A very small number of pupils have dual placements with mainstream schools, and the new hub arrangements do not

change the city's policy and practice on these. Hubs will be encouraged to develop increased opportunities for links with mainstream schools.

5.11 Transport

Some parents had queries about entitlement to home to school transport, and how this might impact on which hub a child might attend, as well as the options available to families, particularly in relation to services which might be offered via the hubs in future. The council's policy on home to school transport does not form part of this consultation. However, transport arrangements will need to be considered carefully when the hubs develop an extended day, to ensure that equalities principles are upheld.

5.12 Traffic

Concerns about the impact of the creation of the hubs on local traffic were raised by a small number of respondents. As the number of children attending our special provision is not likely to change significantly, it is not envisaged that there will be an increase to the traffic involved in transporting pupils between their home and the hub. However, alterations to site access and car parking will form part of the discussions about the improvements to the new hub sites.

5.13 Sites

Many comments were received about the location of the new provision. A number of queries emerged about the future use of current sites. No sites in current use are likely to be relinquished until it is decided that a site is no longer needed. Respondents acknowledged that some sites are no longer fit for purpose (eg Dyke Road KS3 Pupil Referral Unit, which lacks outside space and accommodation which restricts the curriculum able to be offered there). Others will need refurbishment or new buildings. £7.5 million capital funding has been secured to spend on the improvements necessary to enable the three hubs to have the appropriate facilities to meet the needs of their new pupil population, although some doubted whether this would be sufficient. The need for the SEMH hub to be based across a number of different sites was a strong message, as SEMH encompasses both a very diverse range of needs and different patterns of provision depending on whether a pupil has an Education, Health and Care plan (EHCP) or is excluded, for example. The LA intends to address the issues about sites sensitively, working closely with colleagues in the property team to make the most creative use of available accommodation and the additional capital funding.

5.14 Funding

There was some scepticism about the financial case for change, a few suggesting that the proposed changes were merely a budget saving exercise. Making the proposed changes will enable the available funding to be used more efficiently and effectively, so that the city's special provision is sustainable into the future. The status quo is not an option, as there are

significant budget deficits across a range of provision which can no longer be netted off against historic balances or bridged by additional funding from the LA. This was a strong message to staff and parents at consultation events. It is not yet clear exactly how the new funding changes at national level would impact on the city's special provision, but school leaders were positive that a larger number of pupils in each hub and thus larger budgets would give them optimum flexibility to make the best use of available resources.

5.15 Staffing

Whilst many saw that the creation of the new hubs and the extension of provision in some hubs to include early years and post 16 provision might create new professional opportunities for staff, and some staff welcomed this, it was recognised that changes to the staffing structures in the hubs might also mean seeking economies of scale over time and this would impact on staff job security. The presence of union representatives at consultation meetings with staff groups gave them confidence that the appropriate HR processes would be put in place to manage any changes. There was a widespread view that the expertise within the city's current provision was highly valued and should be retained if at all possible. The attendance of governors at consultation events also gave them the opportunity to reinforce their intention to exercise sensitivity in the management of any change. Clarification was given at consultation events that the LA's role was strategic in the creation of the new model of provision, with the responsibility for developing an appropriate staffing and operational structure laying with the governing body.

- 5.16 There were a number of issues raised, which whilst not the focus of the immediate issues of the consultation, were important to capture, so that they can be raised in ongoing review discussions. The new hub leaders will also be provided with further details about this consultation feedback and the LA intends to draft some principles to as a foundation for the ongoing development of the hub.

6. Further considerations

6.1 How can greater efficiency be achieved?

A governing body has responsibility for ensuring that the allocated budget is managed efficiently, whilst ensuring that the needs of pupils are met. The creation of the hubs does not change this, but an increased number of pupils and a larger budget is likely to be able to offer greater flexibility to manage within budget, particularly times of particular financial challenge. The status quo is not an option in the current financial climate. Money saved from any economies of scale that the governing body can achieve could be reinvested into the hub and focussed on the priorities.

6.2 How will current pupils at Hillside and Downs Park be affected by the proposed changes?

There will be a long lead-in time to develop; the new hub, so that any change

can be planned and implemented sensitively, with minimal disruption to pupils. As both Hillside and Downs Park sites are to be retained, pupils will be able to remain on their existing site with their peer group and familiar staff for the immediate future. Longer term, school leaders may make changes to the way the sites are used or how staff are deployed, as any school might when they keep their provision under review. Pupils will undoubtedly benefit from broader curriculum opportunities, both during and beyond the school day alongside their core National Curriculum entitlement. The LA intends to upgrade the school sites using a proportion of the allocated £7.5 million capital money allocated to the implementation of the proposals. These improvements to the learning environment will be of direct benefit to pupils. The availability of an additional £300,000 across the hubs for health and therapy services will enable more joint commissioning of services closely matched to the needs of individual pupils and the hub's priorities. This will enable the hubs to meet the needs of their pupils more holistically.

6.3 What will happen to the staff currently working at Hillside and Downs Park?

The governing body will have responsibility for the appointment of the leadership team of the hub, including the executive headteacher of the west hub. Thereafter, the staffing structure is likely to be developed over time in order to support the desired ethos of the new hub, so that it is seen as new provision, thus avoiding any perceptions that one school has 'taken over' another. The Local Authority very much values the experience and expertise of those working at both schools and shares the wishes of governing bodies to retain these within the city as far as possible.

Once the period of consultation is over, all staff affected by the change will have access to individual meetings to discuss their futures and any opportunities available. Union representatives were present at staff consultation events to reassure staff of their support and fair application of the council's employment policy and practice.

In terms of staff wellbeing at a difficult time, Public Health have offered a range of support services to staff and some funding for staff to organise support for themselves.

6.4 What impact will the changes have on the community?

Both schools have been an integral part of the Portslade community over the years and there is no reason to believe that their positive links in the locality will not be retained and built on. They also have longstanding professional relationships with other mainstream and special provision across the city and these will also continue within the new model of the city's provision. Closer links will be developed with local employment and FE opportunities in order to create the new post 16 provision.

7 THE OUTCOME OF THE CONSULTATION

- 7.1 All responses to the consultation on the creation of the new hubs have been carefully reviewed, alongside three other significant elements of consideration:
- an analysis of the current model of provision in the city which does not reflect the present pattern of need and demand for places
 - the support for change evident during the review process
 - the analysis of the current and future budget position
- 7.2 There are significant budget pressures facing all schools at this time. These have been brought about by cumulative cost pressures, such as pay rises and higher employer contributions to national insurance and pension schemes. At the end of the 2016/17 financial year special school budgets in Brighton and Hove showed a net overspend of £164,000, with 3 of the 8 schools being in an overspend position. Some schools had been able to draw on historic underspends to avoid going over budget because of spiralling costs, but this is no longer sustainable. There is a considerable challenge for these schools to bring their budgets back into balance and it is likely that licensed deficit arrangements will be necessary. The economies of scale that should be delivered through the SEND Review and specifically the redesign of the special schools and Pupil Referral Units will better enable schools (hubs) to achieve balanced budgets.
- 7.3 In response to the consultation feedback the LA has made two changes to the original proposals. The proposed upper age range of the west and SEMH hubs has been adjusted from 18 to 19 and thus creates parity across the city. Secondly, the proposed designation of the east and west hubs has been changed from 'learning difficulties' to 'severe and complex needs'.
- 7.4 The LA has considered the consultation feedback carefully and where there are concerns about the new model of provision, every effort will be made to allay concerns and ensure a smooth transition to the new model for all children. A number of related issues were also raised during the consultation which were not the focus of these specific proposals and these will be considered as the review progresses. The new hub leaders will also be provided with further details about the consultation feedback. The LA intends to draft a statement of principles as a foundation for the ongoing development of the hubs and set out the expected outcomes of the redesigned provision.
- 7.5 It is acknowledged that there were a range of views on the proposals. However taking everything into account, it is felt that to move forward with the proposals to create the hubs would mean the following benefits for the city:
- a) each hub will be able to provide a holistic package of support for pupils and their families through a much more integrated offer across education, health and care/respite on site

- b) proposals respond to feedback from families that they want to see better coordination across education, care and health so that personalised plans for children have a unified set of objectives and outcomes
- c) the integrated hub model supports families to build resilience and stay together by:
 - a better extended day/short break offer where needed
 - direct support to families at home where children have challenging behaviour or very complex needs
- d) the availability of provision within the city which can offer a holistic package for children with multiple needs will reduce the need to resort to expensive out of city placements
- e) parents can be assured that high quality education can be maintained in all hubs, as each hub would consist of a school which has been consistently rated as outstanding and one as good
- f) proposals extend the age range to 19 at all three hubs and allow for more support in the transition to adulthood where needed
- g) best value would be achieved through the largest proportion of funding focussed on pupils and front line services, made possible by a streamlined management structure being in place
- h) the hubs would have sufficient pupils to guarantee financial viability in the future
- i) there would be greater economies of scale when commissioning health and care services
- j) proposals allow for £7.5m to be spent on upgrading the remaining sites
- k) proposals that merge special provision reflect newer successful models of best practice around the country, including that in neighbouring LAs.

7.6 The LA has considered the views expressed carefully and acknowledges that where there was positivity about the principles and vision for the new model of provision, anxieties remain about operational detail. Where real concerns exist, every effort will be made to mitigate these, so that there is no negative impact on pupil outcomes.

7.7 As a result of the feedback from the consultation, the LA has reconsidered the detail of the proposals and has made two changes in the recommendations going forward:

- (i) Extending the upper age range of the west and SEMH hubs from 18 to 19, to create parity across the city
- (ii) Changing the designation of the east and west hubs from 'learning difficulties' to 'severe and complex learning difficulties'

7.8 The principles behind the proposal to create three integrated hubs from our current provision as outlined in this report have the support of:

- The four governing bodies concerned – Hillside, Downs View, Homewood College and the CDP Federation (Cedar Centre, Downs Park and Patcham House)
- The management committees of the two PRUs – Brighton and Hove PRU and the Connected Hub
- The headteachers of Hillside and Downs View Schools and the Acting Executive Headteacher of the CDP Federation
- The Clinical Commissioning Group (specifically community paediatrics and children's mental health).
- The Parent Carers' Council (PACC)

8. Where and when the statutory notice and full proposal information will be available?

Brighton & Hove City Council will publish the statutory notice for this proposal on Friday 30th June 2017. The notice will remain in force for a period of 4 weeks i.e. until Friday 28th July 2017. Copies of the notice will be placed:

- at the entrance to both Hillside and Downs Park schools
- in other places in the community; namely Portslade Village Post Office, Portslade Library and the Jubilee Library

It will also be published in The Brighton & Hove Independent newspaper on 30th June 2017.

A copy of the statutory notice is attached to this document.

On Friday 30th June 2017 the full proposal information (this document plus appendices) will be sent to the following recipients:

- The Secretary of State for Education
- The governing bodies responsible for Hillside and Downs Park schools
- Members of the Children, Young People and Skills Committee
- Local Ward Councillors
- The Members of Parliament for Brighton & Hove
- The parents/ carers of every registered pupil at both Hillside and Downs Park Community Special Schools

It will also be published on the council's website at the following address www.brighton-hove.gov.uk/school-statutory-notices.

Any person may request a copy of the full proposal information either by writing to Edd Yeo at:

Brighton & Hove City Council
Room 116 Hove Town Hall
Norton Road
Hove BN3 3BQ

or by contacting him on 01273 294354 or via email at edd.yeo@brighton-hove.gov.uk.

9. How to make representations or comment on the proposal

Any person may object or make a representation or comment on the proposal. This can be done by writing to:

Regan Delf, Assistant Director Health, SEN and Disability
Brighton & Hove City Council
2nd Floor, Hove Town Hall
Norton Road
Hove BN3 3BQ

before the closing date of 28th July 2017
or via email to her at regan.delf@brighton-hove.gov.uk

Following the closing date for representations, comments and objections, a report will be prepared for Children, Young People and Skills Committee to decide the proposal within two months i.e. no later than 29th September 2017. At the present time it is anticipated that the report will be considered at their meeting scheduled for 18th September 2017

[Appendix 1 Link](#)

Appendix 4

Brighton & Hove City Council

Statutory Notice: Proposals to discontinue Cedar Centre Community Special School and to enlarge the capacity and change the SEN designation of Downs View Community Special School

Notice is given in accordance with the Education and Inspections Act 2006 (“the Act”) that Brighton & Hove City Council, (“the Local Authority”), Hove Town Hall, Norton Road, Hove, East Sussex BN3 3BQ intends to implement the following proposals:

Part 1: Discontinuation of Cedar Centre Community Special School, Lynchet Close, Brighton BN1 7FP so that a combined hub offering improved integrated education and health and care offer can be created.

In accordance with section 15(1) of the Education and Inspections Act 2006 the Local Authority proposes to discontinue Cedar Centre Community Special School with effect from 31 August 2018.

It is intended that pupils attending Cedar Centre Special School at the time of closure will be offered places in Downs View Special School which, subject to Part 2, will enlarge its capacity, becoming the integrated hub from 31 August 2018.

This proposal will only take effect in conjunction with the proposals set out in Part 2. Neither part will be implemented separately.

Part 2: Prescribed changes to Downs View Community Special School, Warren Road, Brighton BN2 6BB from 1 September 2018 to create the integrated hub.

In accordance with section 19(1) of the Act it is intended to make the following prescribed alterations to Downs View Community Special School:

- (i) Enlarge the capacity of the school
- (ii) Change the SEN designation to ‘severe and complex needs’

Downs View is currently registered for 124 pupils. It is proposed to increase the capacity of the school to 200 which would include the number of registered places at Cedar Centre Community Special School. It is proposed that the increase in capacity will be achieved by initially utilising the premises of the former Cedar Centre Community Special School until the accommodation on the Downs View site is extended. It is also proposed that Downs View Community Special School will change its name.

This Notice is an extract from the complete proposal. Copies of the complete proposal can be obtained from: Edd Yeo at Brighton & Hove City Council, Hove Town Hall Norton Road, Hove BN3 3BQ or by contacting him on 01273 294354 or via email at edd.yeo@brighton-hove.gov.uk. The Full Proposal is also on the Local Authority’s website and can be found at [http://www.brighton-hove.gov.uk/statutory notices](http://www.brighton-hove.gov.uk/statutory%20notices)

Within four weeks from the date of publication of this proposal (i.e. by 28 July 2017), any person may object to or make comments on the proposal by sending them to Regan Delf, Assistant Director Health, SEN and Disability, Brighton & Hove City Council, Hove Town Hall Norton Road Hove BN3 3BQ or via email to regan.delf@brighton-hove.gov.uk

Signed: Pinaki Ghoshal

Publication Date: 30 June 2017

Full statutory proposal information for proposed changes to Downs View Community Special School and Cedar Centre Community Special School

1. In accordance with sections 15 (1) and 19(1) of the Education and Inspections Act 2006 Brighton & Hove City Council proposes to expand and change the designation of Downs View Community Special School with effect from 1 September 2018 and proposes to close Cedar Centre Community Special School with effect from 31 August 2018

1.1 Local Authority (LA) details

Brighton & Hove City Council
Hove Town Hall
Norton Road
Hove BN3 3BQ

1.2 School details

Downs View Community Special School
Warren Road
Brighton BN2 6BB

Cedar Centre Community Special School
Lynchet Close,
Brighton BN1 7FP

- 1.3 Downs View is a registered Community Special School which makes day provision for boys and girls aged 2-19 with severe, profound and multiple learning difficulties. It is rated as outstanding by Ofsted. Cedar Centre is a registered Community Special School which makes day provision for boys and girls from age 4 to 16 with complex needs. It is rated as good by Ofsted. Currently there are 124 places commissioned at Downs View and 65 places commissioned at Cedar Centre. All pupils at both schools have an Education, Health and Care Plan or a statement of special educational needs and come mainly, but not exclusively from the east of the city. Neither school has a religious character. Downs View school currently is commissioned to manage the city's 16-19 specialist provision at Downs View Link College on the same site as Varndean College, a local mainstream sixth form college.

2. Implementation plan

- 2.1 These proposals are part of a redesign of the city's special provision and thus linked to other proposals being made concurrently. In order to achieve the merger between Downs View school and Cedar Centre to create a hub in the east of the city for pupils with a wider range of learning difficulties and complex needs, the LA is proposing to:
 - close Cedar Centre in August 2018
 - expand the number of places at Downs View to include those currently

- commissioned at Cedar Centre
- change the designation of Downs View to severe and complex learning difficulties.

Pupils from the Cedar Centre will remain on their current site, until either the building work on the Downs View site is finished or their individual plan supports transition at a more appropriate point. There is a long lead in time for the development of the new hub, and thus many of the pupils currently at the Cedar Centre will remain there until the end of their school career. A small number may transfer to alternative provision, should this be more appropriate to their needs. These two proposals are linked proposals and the local authority will either implement both proposals or neither. There will not be an instance where one proposal would be implemented on its own.

3. The objectives of the proposals

- 3.1 All LAs have a statutory responsibility to keep SEND provision under review, in order to be able to ensure that provision is able to meet the needs of children and young people with SEND and is sustainable into the future. The LA believes that the changes proposed will enhance the standard, range and quality of the city's special provision, which is all currently judged as good or outstanding. These schools are two of the city's six special schools. In 2014, Brighton and Hove City Council conducted a wide ranging review of its services for children with special educational needs and disabilities, which concluded that the LA should move towards developing more integrated and flexible services to provide for the holistic needs of those with SEND and their families and in doing so, could make better use of existing resources. The LA intends to maintain the existing number of special school places in the city overall, although these will be distributed across fewer provisions.
- 3.2 These proposals:
- are based on a vision to improve the integrated education, health and care offer for our most vulnerable young people
 - re-design our existing six special schools and two Pupil Referral Units into three 'hubs' offering enhanced education, health support and extended day provision on one site
 - maintain the number of special school and PRU places available across the city
 - consolidate provision so that it runs more efficiently and more sustainably into the future.

4. The decision making process

4.1 The journey of the review

There have been a number of milestones as the review has progressed towards more specific proposals for change across the city: Further details can be found in the committee report in Appendix 1.

4.2 Governance and participation

The integrity of this SEND review was overseen by a high level strategic Governance Board, and included parent/carers and young people, in line with the Local Authority's commitment to engage parents and young people effectively at all levels of strategic and decision making forums. During the life of the review, project groups were formed to cover the following areas:

- Learning difficulties (LD)
- Social emotional and mental health (SEMH)
- Early years (EY)
- Post 16 provision

Each group consisted of a broad range of stakeholders who would be affected by the changes in some way and who together had a breadth of expertise and experience to support the LA in its intention to co-produce specific options for change on which to formally consult

4.3 Formal consultation on the creation of the hubs across the city, including the proposal to create that for the west of the city by merging Downs View Community Special School through the expansion and re-designation of Downs View Community Special school and closing Cedar Centre Community Special School

At their meeting on 6 March 2017, the Children, Young People and Skills Committee agreed to proceed with a formal consultation on proposals to create the new hubs, which included a proposed hub in the east of the city, formed by merging Downs View and Cedar Centre schools. The proposal would require the expansion and re-designation of Downs View school and the closure Cedar Centre school. The consultation was conducted through a range of meetings with parent/carers, young people, education, social care and health staff and voluntary organisations alongside the opportunity for views to be submitted via the council's online consultation portal. The consultation period ran from 15 March to 9 May 2017.

Analysis of the feedback on the consultation of the hubs across the city can be found via Appendix1.

The feedback received online and via the consultation events covered the creation of hubs across the city. Thus the following summary in section 5 covers both the proposals relating to Downs View and Cedar Centre, as well as the proposals relating to the redesign of special provision across the city.

5. Summary of the main issues raised, with responses

5.1 The prospect of change

Parents were generally very happy with the current provision made for their child's needs and appreciated the high quality of the city's special provision, which are all rated good or outstanding by Ofsted. Any change that might disrupt this caused some parents and staff anxiety. However, maintaining the

status quo is not an option as the city's large number of very small schools is not financially sustainable. The level of commitment from senior leaders to continue to build on the quality offered at the moment to make the best possible provision in the future for the city's most vulnerable children and young people acknowledges the views of those who urged change and offers reassurance that the existing quality will at least be maintained. The existing governing bodies have begun to work together in different groupings, so that the transition from one model to another is as smooth as possible for everyone. This should mitigate the concerns expressed that the mergers would result in a 'take over' of one school over another to the point of domination.

Both the LA and the governing bodies have been keen to emphasise that the hubs will be deemed new organisations and the ethos developed with the shared perspective of school leaders, staff, parents and pupils. The council has agreed a long lead in time for any changes, as it is proposed that the hubs come into being on September 2018 and changes will be introduced over a number of years to minimise disruption for individual pupils. In some instances, ie the Pupil Referral Units, pupils were not always in agreement with their parents and welcomed the prospect of change, particularly new facilities and a wider curriculum offer. The proposal to increase post 16 opportunities received very positive feedback.

5.2 The level of detail

Although they recognised that this consultation focussed primarily on the model of provision and its legal framework, some respondents felt that they would have liked more detail about how the hubs might work on a day to day basis to be confident that they would be able to provide effectively for the needs of pupils and families. Governors and senior leaders attended the consultation meetings with parents and were able to give reassurance not only that they would want to retain the best of what currently exists and plan any changes sensitively and over time, but also that they were committed to involving parents in taking the hubs forward, so that what is provided in the future for pupils and their families is tailored to their needs. The LA would ensure that senior leaders have the feedback from the consultation so that they can use this to frame their early thinking and talk further to staff and families in the spirit of engagement and co-production.

5.3 Impact on pupils

Whilst there was some anxiety about the impact of changes to schools with which pupils are already familiar, it was acknowledged that the development of hubs will broaden what they can offer to pupils within the learning curriculum and in their social and personal development. The continuing need for programmes tailored to the needs of individuals, with a particular focus on personalised learning styles was considered important to ensure that pupils maximise their potential. There was support for the new provision to be introduced over a period of time, as it was agreed that this would minimise disruption for pupils. The vast majority of pupils will remain on their current site

with familiar staff. Where the needs of individual pupils might necessitate some changes, then this will be managed sensitively with a personalised plan for each pupil. Downs View School has had recent experience of a significant building work project adjacent to the school which was managed effectively to keep noise to a minimum and minimise any impact on pupils. The school's senior leaders were able to offer reassurance to parents that building work to extend the school or refurbish existing buildings would be managed similarly.

5.4 The size of the new hubs

Many parents liked very small schools and were keen to retain the personalised approaches that current provision is able to offer. The importance of continuing to tailor provision to the needs of individuals was a clear message in the consultation feedback and school leaders were able to explain that this approach, proven to be effective, would be maintained. Some respondents were very supportive of the council's rationale for creating larger organisations which could operate more flexibly and make the best use of resources. Strategic leaders in particular acknowledged that even at the new pupil numbers, they would not constitute large schools, compared to both similar provision in neighbouring LAs and the national picture and would offer exciting opportunities to do things differently.

5.5 The combination of schools to create the hubs

Whilst recognising the need to create larger schools with greater opportunities for flexibility and efficiency, some respondents questioned the rationale for bringing together the schools in the combinations which the proposals put forward. A small number suggested alternatives, for example bringing together Cedar Centre and Downs Park, whose pupil populations were felt to be similar, alongside a merged Hillside and Downs View would be a preferred option. This had been considered at an earlier stage of the review debate but not favoured, as it limited parental choice further and did not make best use of the benefits arising from the geographical location of the existing schools. Cedar Centre and Downs Park have historically been part of a Federation of three schools, but this model has not enabled them to maintain an even balance of pupil numbers.

5.6 Inclusion

The proposal to bring together a wider range of pupils with special educational needs in one hub created considerable debate. Those who supported the concept of inclusion in its broadest sense had no problem with this. However, others did not want the pupils either across the whole age range or with different needs to mix together. There was a difference in opinion about the apparent disparity between the council's commitment to inclusion and the extension of the age ranges of the new provision, although it was recognised that this increased the options available to parents. Concern was expressed about how the admission of very young children, particularly to SEMH provision, might lead to early 'labelling' of children, which was felt to be undesirable. Some parents were worried that resources might come under

pressure by the demands of those with profound and multiple learning difficulties, or that the needs of those deemed less complex might be overlooked. Some health colleagues in particular suggested that the schools should be brought together according to need, rather than locality. However, the council continues to have a legal duty to meet the needs of all pupils with special educational needs and disabilities. There is confidence, based on the experience of other LAs who have developed similar provision that this can be achieved very successfully in schools with a wider range of needs. There are a number of ways in which this can be managed- by the creative use of sites, a range of groupings according to learning style, pupil need and social, emotional and communication issues. The city's current PRU provision for primary and Key Stage 4 is effectively managed on the same site, but with separate accommodation and entrances, and offers one model of using sites creatively. Some parents who have opted to educate their children with very complex needs in mainstream were keen that consideration be given to them being able to access the wider range of services which are planned to be developed within the hubs.

5.7 The breadth of the new provision

Some parents were anxious that the needs of those pupils on the autistic spectrum were not being sufficiently addressed within the proposed changes. The current special schools all have pupils with a diagnosis of autism and this will continue. The council also plans to develop a new Special Facility in a mainstream secondary school to enable the needs of those with a range of communication difficulties to be met. It is planned that this should open in September 2018. Additionally the LA is looking to create a small specialist unit within one of the hubs for the small number of more able pupils with autism/Asperger's syndrome, whose challenging behaviour or mental health needs mean that they cannot cope in a mainstream school. The LA acknowledged the view of some parents that a change in designation of Hillside and Downs View to the generic term of 'learning difficulties' may not reflect the full breadth of needs that the hub is intended to meet. Thus the proposed re-designation has been adjusted to 'severe and complex learning difficulties.' The hubs should be able to offer a wider range of curriculum opportunities than previously available through smaller schools and this is likely to result in a curriculum that is more tailored to the ability, needs and interests of pupils than ever before, including those on the autistic spectrum. Respondents were keen that a wide range of accreditation options would be available in the new hubs, so that individual students could explore their talents fully, and gain qualifications according to their potential. PRU pupils were particularly keen to access a wider and more creative curriculum than at present, with improved facilities, and the creation of the SEMH hub is intended to offer increased flexibility by giving specialist staff the opportunity for staff development to work across different cohorts.

5.8 Post 16 provision

This was an area of the consultation which solicited strong views. There was little disagreement to the proposal to extend opportunities for provision beyond

the age of 16. However, there was a range of views about what this might look like and who could offer this provision. Existing providers of post 16 provision for those with the most severe and complex needs preferred that this provision should be expanded to retain a citywide provision for this cohort of students, although it was recognised that the numbers of students would exceed the capacity of the current building. There was considerable support from those mostly closely linked with the west and citywide SEMH hubs that the creation of post 16 provision elsewhere would enable there to be a broader range of models and thus offer different pathways to adulthood. It is intended that the new provision delivered via the west and citywide SEMH hubs should focus more on enhancing opportunities for those who could access local college courses or pathways to employment with the right level of specialist help, thus creating joint ventures with other providers. It was acknowledged that the original proposal created some inequality in the proposed age ranges for post 16 provision and the LA has addressed this in response to the views expressed during the consultation. The proposed age range for the SEMH and west hub is now extended to aged 19.

5.9 Integrated working

Meeting the holistic needs of pupils through working effectively together was rated as the one of the highest priorities at an earlier stage in the SEND review. Many respondents agreed that this would be a significant benefit of how the hubs would deliver what pupils need. The allocation of the proposed additional £300,000 across the 3 hubs for therapies and health services was welcomed. There was support for a greater role in school leaders in joint commissioning what services can be provided, and how they might best be integrated into the hub's core offer. Early work has begun with key partners to plan for any changes that might be necessary to secure joint planning and delivery of services.

5.10 Admissions

Some parents whose children do not currently attend their most local special school were anxious that they would be required to move their child to the hub closest to their home address. This consultation does not propose any changes to the admission arrangements to special provision. The LA would always look to place a child in their most local school, if that school is able to offer provision appropriate to a child's needs. However, parents still have a right to express a preference, and the LA is obliged to comply with that preference as long as it would not be unsuitable for the age, ability, aptitude or SEN of the child or young person, or the attendance of the child or young person there would be incompatible with the efficient education of others, or the efficient use of resources. A very small number of pupils have dual placements with mainstream schools, and the new hub arrangements do not change the city's policy and practice on these. Hubs will be encouraged to develop increased opportunities for links with mainstream schools.

5.11 Transport

Some parents had queries about entitlement to home to school transport, and how this might impact on which hub a child might attend, as well as the options available to families, particularly in relation to services which might be offered via the hubs in future. The council's policy on home to school transport does not form part of this consultation. However, transport arrangements will need to be considered carefully when the hubs develop an extended day, to ensure that equalities principles are upheld.

5.12 Traffic

Concerns about the impact of the creation of the hubs on local traffic were raised by a small number of respondents. As the number of children attending our special provision is not likely to change significantly, it is not envisaged that there will be an increase to the traffic involved in transporting pupils between their home and the hub. However, alterations to site access and car parking will form part of the discussions about the improvements to the new hub sites.

5.13 Sites

Many comments were received about the location of the new provision. A number of queries emerged about the future use of current sites. No sites in current use are likely to be relinquished until it is decided that a site is no longer needed. Respondents acknowledged that some sites are no longer fit for purpose (eg Dyke Road KS3 Pupil Referral Unit, which lacks outside space and accommodation which restricts the curriculum able to be offered there). Others will need refurbishment or new buildings. £7.5 million capital funding has been secured to spend on the improvements necessary to enable the three hubs to have the appropriate facilities to meet the needs of their new pupil population, although some doubted whether this would be sufficient. The need for the SEMH hub to be based across a number of different sites was a strong message, as SEMH encompasses both a very diverse range of needs and different patterns of provision depending on whether a pupil has an Education, Health and Care plan (EHCP) or is excluded, for example. The LA intends to address the issues about sites sensitively, working closely with colleagues in the property team to make the most creative use of available accommodation and the additional capital funding.

5.14 Funding

There was some scepticism about the financial case for change, a few suggesting that the proposed changes were merely a budget saving exercise. Making the proposed changes will enable the available funding to be used more efficiently and effectively, so that the city's special provision is sustainable into the future. The status quo is not an option, as there are budget deficits across a range of special provision, which can no longer be netted off against historic balances or bridged by additional funding from the LA. This was a strong message to staff and parents at consultation events. It

is not yet clear exactly how the new funding changes at national level would impact on the city's special provision, but school leaders were positive that a larger number of pupils in each hub and thus larger budgets would give them optimum flexibility to make the best use of available resources.

5.15 Staffing

Whilst many saw that the creation of the new hubs and the extension of provision in some hubs to include early years and post 16 provision might create new professional opportunities for staff, and some staff welcomed this, it was recognised that changes to the staffing structures in the hubs might also mean seeking economies of scale over time and this would impact on staff job security. The presence of union representatives at consultation meetings with staff groups gave them confidence that the appropriate HR processes would be put in place to manage any changes. There was a widespread view that the expertise within the city's current provision was highly valued and should be retained if at all possible. The attendance of governors at consultation events also gave them the opportunity to reinforce their intention to exercise sensitivity in the management of any change. Clarification was given at consultation events that the LA's role was strategic in the creation of the new model of provision, with the responsibility for developing an appropriate staffing and operational structure laying with the governing body.

- 5.16 There were a number of issues raised, which whilst not the focus of the immediate issues of the consultation, were important to capture, so that they can be raised in ongoing review discussions. The new hub leaders will also be provided with further details about this consultation feedback and the LA intends to establish some principles as a foundation for the ongoing development of the hub and set out the expected outcomes of the redesigned provision.

6. Further considerations

6.1 How can greater efficiency be achieved in the east hub?

A governing body has responsibility for ensuring that the allocated budget is managed efficiently, whilst ensuring that the needs of pupils are met. The creation of the hubs does not change this, but an increased number of pupils and a larger budget are likely to be able to offer greater flexibility to manage within budget, particularly times of particular financial challenge. The status quo is not an option in the current financial climate, as the LA is unable to sustain further allocation of additional funding to balance special school budgets. Money saved from any economies of scale that the governing body can achieve could be reinvested into the hub and focussed on their priorities.

6.2 How will current pupils at Downs View and Cedar Centre be affected by the proposed changes?

There will be a long lead in time to develop the new hub, so that any change can be planned and implemented sensitively, with minimal disruption for

children. In the immediate future, the current sites of both schools are to be retained. Thus current pupils from both schools will be able to remain on their existing site with their peer group and familiar staff for the immediate future. The transition of the small number of Cedar centre pupils to the new site will be planned at the appropriate time according to their needs. A small number of existing Cedar Centre pupils may transfer to alternative provision, should this be more appropriate to their needs. The LA intends to use a proportion of the £7.5million capital money set aside for the redesign of special provision to refurbish the current Downs View site and build new accommodation and improved facilities to enable the new hub to be located on the Woodingdean site in the future. An improved learning environment is likely to benefit all pupils.

Longer term, school leaders may make changes to how staff are deployed, as any school might when they keep their provision under review. In the new hub pupils will undoubtedly benefit from broader curriculum opportunities, both during and beyond the school day alongside their core National Curriculum entitlement. Improvements to the learning environment when the new school site from the allocated capital money to support the implementation of the proposals will be of direct benefit to pupils. The availability of an additional £300,000 across the hubs for health and therapy services will enable more joint commissioning of services closely matched to the needs of individual pupils and the hub's priorities. This will enable the hubs to meet the needs of their pupils more holistically.

6.3 What will happen to the staff currently working at Downs View and Cedar Centre?

The governing body will have responsibility for the appointment of the leadership team of the hub, including the executive headteacher of the east hub. Thereafter, the staffing structure is likely to be developed over time in order to support the desired ethos of the new hub, so that it is seen as new provision, thus avoiding any perceptions that one school has 'taken over' another. The LA very much values the experience and expertise of those working at both schools and shares the wishes of governing bodies to retain these within the city as far as possible.

Once the period of consultation is over, all staff affected by the change will have access to individual meetings to discuss their futures and any opportunities available. Union representatives were present at staff consultation events to reassure staff of their support and fair application of the council's employment policy and practice.

In terms of staff wellbeing at a difficult time, Public Health have offered a range of support services to staff and some funding for staff to organise support for themselves.

6.4 What impact will the changes have on the community?

Both schools have been an integral part of the city's special school community

over the years and there is no reason to believe that their positive links in the locality will not be retained and built on. They also have longstanding professional relationships with other special provision across the city and these will also continue within the new model of the city's provision.

7 THE OUTCOME OF THE CONSULTATION

- 7.1 All responses to the consultation on the creation of the new hubs have been carefully reviewed, alongside three other significant elements of consideration:
- an analysis of the current model of provision in the city which does not reflect the present pattern of need and demand for places
 - the support for change evident during the review process
 - the analysis of the current and future budget position
- 7.2 There are significant budget pressures facing all schools at this time. These have been brought about by cumulative cost pressures, such as pay rises and higher employer contributions to national insurance and pension schemes. At the end of the 2016/17 financial year special school budgets in Brighton and Hove showed a net overspend of £164,000, with 3 of the 8 schools being in an overspend position. Some schools had been able to draw on historic underspends to avoid going over budget because of spiralling costs, but this is no longer sustainable. There is a considerable challenge for these schools to bring their budgets back into balance and it is likely that licensed deficit arrangements will be necessary. The economies of scale that should be delivered through the SEND Review and specifically the redesign of the special schools and Pupil Referral Units will better enable schools (hubs) to achieve balanced budgets.
- 7.3 In response to the consultation feedback the LA has made two changes to the original proposals. The proposed upper age range of the west and SEMH hubs has been adjusted from 18 to 19 and thus creates parity across the city. Secondly, the proposed designation of the east and west hubs has been changed from 'learning difficulties' to 'severe and complex needs'.
- 7.4 The LA has considered the consultation feedback carefully and where there are concerns about the new model of provision, every effort will be made to allay concerns and ensure a smooth transition to the new model for all children. A number of related issues were also raised during the consultation which were not the focus of these specific proposals and these will be considered as the review progresses. The new hub leaders will also be provided with further details about the consultation feedback. The LA intends to draft a statement of principles as a foundation for the ongoing development of the hubs and set out the expected outcomes of the redesigned provision.
- 7.5 It is acknowledged that there were a range of views on the proposals. However taking everything into account, it is felt that to move forward with the proposals to create the hubs would mean the following benefits for the city:

- a) each hub will be able to provide a holistic package of support for pupils and their families through a much more integrated offer across education, health and care/respite on site
- b) proposals respond to feedback from families that they want to see better coordination across education, care and health so that personalised plans for children have a unified set of objectives and outcomes
- c) the integrated hub model supports families to build resilience and stay together by:
 - a better extended day/short break offer where needed
 - direct support to families at home where children have challenging behaviour or very complex needs
- d) the availability of provision within the city which can offer a holistic package for children with multiple needs will reduce the need to resort to expensive out of city placements
- e) parents can be assured that high quality education can be maintained in all hubs, as each hub would consist of a school which has been consistently rated as outstanding and one as good
- f) proposals extend the age range to 19 at all three hubs and allow for more support in the transition to adulthood where needed
- g) best value would be achieved through the largest proportion of funding focussed on pupils and front line services, made possible by a streamlined management structure being in place
- h) the hubs would have sufficient pupils to guarantee financial viability in the future
- i) there would be greater economies of scale when commissioning health and care services
- j) proposals allow for £7.5m to be spent on upgrading the remaining sites
- k) proposals that merge special provision reflect newer successful models of best practice around the country, including that in neighbouring LAs.

7.6 The LA has considered the views expressed carefully and acknowledges that where there was positivity about the principles and vision for the new model of provision, anxieties remain about operational detail. Where real concerns exist, every effort will be made to mitigate these, so that there is no negative impact on pupil outcomes.

7.7 As a result of the feedback from the consultation, the LA has reconsidered the detail of the proposals and has made two changes in the recommendations going forward:

- (i) Extending the upper age range of the west and SEMH hubs from 18 to 19, to create parity across the city
- (ii) Changing the designation of the east and west hubs from 'learning difficulties' to 'severe and complex learning difficulties'

7.8 The principles behind the proposal to create three integrated hubs from our current provision as outlined in this report have the support of:

- The four governing bodies concerned – Hillside, Downs View, Homewood College and the CDP Federation (Cedar Centre, Downs Park and Patcham House)
- The management committees of the two PRUs – Brighton and Hove PRU and the Connected Hub
- The headteachers of Hillside and Downs View Schools and the Acting Executive Headteacher of the CDP Federation
- The Clinical Commissioning Group (specifically community paediatrics and children’s mental health).
- The Parent Carers’ Council (PACC)

8. Where and when will the statutory notice and full proposal information be available?

Brighton & Hove City Council will publish the statutory notice for this proposal on Friday 30th June 2017. The notice will remain in force for a period of 4 weeks i.e. until Friday 28th July 2017. Copies of the notice will be placed:

- at the entrance to both Downs View (main site and Downs View Link College site) and Cedar Centre schools
- in other places in the community; namely the local post office, library and the Jubilee Library

It will also be published in The Brighton & Hove Independent newspaper on 30th June 2017.

A copy of the statutory notice is attached to this document.

On Friday 30th June 2017 the full proposal information (this document plus appendices) will be sent to the following recipients:

- The Secretary of State for Education
- The governing bodies responsible for Downs View and Cedar Centre schools
- Members of the Children, Young People and Skills Committee
- Local Ward Councillors
- The Members of Parliament for Brighton & Hove
- The parents/ carers of every registered pupil at both Cedar Centre and Downs View Community Special Schools

It will also be published on the council’s website at the following address www.brighton-hove.gov.uk/school-statutory-notice.

Any person may request a copy of the full proposal information either by writing to Edd Yeo at:

Brighton & Hove City Council
 Room 116 Hove Town Hall
 Norton Road
 Hove BN3 3BQ

or by contacting him on 01273 294354 or via email at edd.yeo@brighton-hove.gov.uk.

9. How to make representations or comment on the proposal

Any person may object or make a representation or comment on the proposal. This can be done by writing to:

Regan Delf, Assistant Director Health, SEN and Disability
Brighton & Hove City Council
2nd Floor, Hove Town Hall
Norton Road
Hove BN3 3BQ

or via email to her at regan.delf@brighton-hove.gov.uk before the closing date of 28th July 2017

Following the closing date for representations, comments and objections, a report will be prepared for Children, Young People and Skills Committee to decide the proposal within two months i.e. no later than 29th September 2017. At the present time it is anticipated that the report will be considered at their meeting scheduled for 18th September 2017

[Appendix 1 Link](#)

Appendix 5

Brighton & Hove City Council

Statutory Notice: Proposals to make prescribed alterations to change the age range and enlarge the capacity of Homewood College Community Special School

Notice is given in accordance with the Education and Inspections Act 2006 (“the Act”) that Brighton & Hove City Council, (“the Local Authority”), Hove Town Hall, Norton Road, Hove, East Sussex BN3 3BQ intends to implement the following proposals so that a combined hub offering improved integrated education and health and care offer can be created:

Prescribed changes to Homewood Community Special School, Queensdown School Road, Brighton BN1 7LA from 1 September 2018 to create the new integrated hub.

In accordance with section 19(1) of the Act it is intended to make the following prescribed alterations to Homewood Community Special School:

- (i) Enlarge the capacity of the school
- (ii) Extend the age range from 11-16 to 5-19

Homewood is currently registered for 45 pupils. It is proposed to increase the capacity of the school to 60 in order that some pupils who are currently attending the Local Authority’s Pupil Referral Unit have the option to transfer to Homewood College. It is also proposed to extend the current age range from 11-16 to 5-19 years of age. It is proposed that the increase in capacity will be achieved by utilising other premises across the city, including the existing Pupil Referral Unit, in order to be able to make effective provision for the full range of need. If necessary there could also be an extension at the existing school site.

This Notice is an extract from the complete proposal. Copies of the complete proposal can be obtained from: Edd Yeo at Brighton & Hove City Council, Hove Town Hall Norton Road, Hove BN3 3BQ or by contacting him on 01273 294354 or via email at edd.yeo@brighton-hove.gov.uk. The Full Proposal is also on the Local Authority’s website and can be found at [http://www.brighton-hove.gov.uk/statutory notices](http://www.brighton-hove.gov.uk/statutory%20notices)

Within four weeks from the date of publication of this proposal (i.e. by 28 July 2017), any person may object to or make comments on the proposal by sending them to Regan Delf, Assistant Director Health, SEN and Disability, Brighton & Hove City Council, Hove Town Hall Norton Road Hove BN3 3BQ or via email to regan.delf@brighton-hove.gov.uk

Signed: Pinaki Ghoshal

Publication Date: 30 June 2017

Full statutory proposal information for proposed changes to Homewood College Community Special School

1. In accordance with sections 19(1) of the Education and Inspections Act 2006 Brighton & Hove City Council proposes to expand and extend the age range of Homewood Community Special School with effect from 1 September 2018.

1.1 Local Authority (LA) details

Brighton and Hove City Council
Hove Town Hall
Norton Road
Hove BN3 3BQ

1.2 School details

Homewood College Community Special School
Queensdown School Road
Brighton BN1 7LA

- 1.3 Homewood College is a registered Community Special School which makes day provision for boys and girls aged 11-16 with social, emotional and mental health needs. It is rated as good by OFSTED. Currently the LA commissions 45 places at the school. All pupils have an Education, Health and Care Plan or a statement of special educational needs and come from across the city. The school does not have a religious character.

2. Implementation plan

- 2.1 This proposal is part of a redesign of the city's special provision and thus linked to other proposals being made concurrently. For Homewood College, the Local Authority is proposing to:
- expand the number of places from 1 September 2018
 - change the age range from 11-16 to 5-19

and bring this provision together with the city's Pupil Referral Unit to create a citywide hub for children and young people with a wide range of social, emotional and mental health needs. In order to be able to meet the full range of need, the hub will make use of more than one site. This proposal is linked to other concurrent proposals and the Local Authority will either implement all proposals or none of them. There will not be an instance where one proposal would be implemented on its own.

3. The objectives of the proposals

- 3.1 All LAs have a statutory responsibility to keep SEND provision under review, in order to be able to ensure that provision is able to meet the needs of children and young people with SEND and is sustainable into the future. The LA believes that the changes proposed will enhance the standard, range and quality of the city's special provision, which is all currently judged as good or outstanding. Homewood College is one of the city's 6 special schools. In 2014, Brighton and Hove City Council conducted a wide ranging review of its services for children with special educational needs and disabilities, which concluded that the LA should move towards developing more integrated and flexible services to provide for the holistic needs of those with SEND and their families and in doing so, could make better use of existing resources. The LA intends to maintain the existing number of special school places across the

city, although these will be distributed across fewer provisions.

3.2 These proposals:

- are based on a vision to improve the integrated education, health and care offer for our most vulnerable young people
- re-design our existing six special schools and two Pupil Referral Units into three 'hubs' offering enhanced education, health support and extended day provision on one site
- maintain the number of special school and PRU places available across the city
- consolidate provision so that it runs more efficiently and more sustainably into the future.

4. The decision making process

4.1 The journey of the review

There have been a number of milestones as the review has progressed towards more specific proposals for change across the city: Further details can be found in the committee report in Appendix 1.

4.2 Governance and participation

The integrity of this SEND review was overseen by a high level strategic Governance Board, and included parent/carers and young people, in line with the Local Authority's commitment to engage parents and young people effectively at all levels of strategic and decision making forums. During the life of the review, project groups were formed to cover the following areas:

- Learning difficulties (LD)
- Social emotional and mental health (SEMH)
- Early years (EY)
- Post 16 provision

Each group consisted of a broad range of stakeholders who would be affected by the changes in some way and who together had a breadth of expertise and experience to support the LA in its intention to co-produce specific options for change on which to formally consult

4.3 Formal consultation on the creation of the hubs across the city, including the proposal to create a citywide hub for those children and young people with SEMH

At their meeting on 6 March 2017, the Children, Young People and Skills Committee agreed to proceed with a formal consultation on proposals to redesign the existing special schools and Pupil Referral Units to create three new hubs, including a hub for pupils with SEMH. The consultation was conducted through a programme of events for parent/carers, young people, education, social care and health staff and voluntary organisations. Feedback was also gathered via the council's online consultation portal. The consultation period ran from 15 March to 9 May 2017.

Analysis of the feedback on the consultation of the hubs across the city can be found via Appendix 1.

The feedback received online and via the consultation events covered the creation of hubs across the city. Thus the following summary in section 5 covers both the proposals relating to Homewood College as well as the proposals relating to the redesign of special provision across the city.

5. Summary of the main issues raised, with responses

5.1 The prospect of change

Parents were generally very happy with the current provision made for their child's needs and appreciated the high quality of the city's special provision which are all rated good or outstanding by Ofsted. Any change that might disrupt this caused some parents and staff anxiety. However, maintaining the status quo is not an option as the city's large number of very small schools is not financially sustainable. The level of commitment from senior leaders to continue to build on the quality offered at the moment to make the best possible provision in the future for the city's most vulnerable children and young people acknowledges the views of those who urged change and offers reassurance that the existing quality will at least be maintained. The existing governing bodies have begun to work together in different groupings, so that the transition from one model to another is as smooth as possible for everyone. This should mitigate the concerns expressed that the mergers would result in a 'take over' of one school over another to the point of domination.

Both the LA and the governing bodies have been keen to emphasise that the hubs will be deemed new organisations and the ethos developed with the shared perspective of school leaders, staff, parents and pupils. The council has agreed a long lead in time for any changes, as it is proposed that the hubs come into being on September 2018 and changes will be introduced over a number of years to minimise disruption for individual pupils. In some instances, ie the Pupil Referral Units, pupils were not always in agreement with their parents and welcomed the prospect of change, particularly new facilities and a wider curriculum offer. The proposal to increase post 16 opportunities received very positive feedback.

5.2 The level of detail

Although they recognised that this consultation focussed primarily on the model of provision and its legal framework, some respondents felt that they would have liked more detail about how the hubs might work on a day to day basis to be confident that they would be able to provide effectively for the needs of pupils and families. Governors and senior leaders attended the consultation meetings with parents and were able to give reassurance not only that they would want to retain the best of what currently exists and plan any changes sensitively and over time, but also that they were committed to

involving parents in taking the hubs forward, so that what is provided in the future for pupils and their families is tailored to their needs. The LA would ensure that senior leaders have the feedback from the consultation so that they can use this to frame their early thinking and talk further to staff and families in the spirit of engagement and co-production.

5.3 Impact on pupils

Whilst there was some anxiety about the impact of changes to schools with which pupils are already familiar, it was acknowledged that the development of hubs will broaden what they can offer to pupils within the learning curriculum and in their social and personal development. The continuing need for programmes tailored to the needs of individuals, with a particular focus on personalised learning styles was considered important to ensure that pupils maximise their potential. There was support for the new provision to be introduced over a period of time, as it was agreed that this would minimise disruption for pupils. The vast majority of pupils will remain on their current site with familiar staff. Where the needs of individual pupils might necessitate some changes, then this will be managed sensitively with a personalised plan for each pupil. Downs View School has had recent experience of a significant building work project adjacent to the school which was managed effectively to keep noise to a minimum and minimise any impact on pupils. The school's senior leaders were able to offer reassurance to parents that building work to extend the school or refurbish existing buildings would be managed similarly.

5.4 The size of the new hubs

Many parents liked very small schools and were keen to retain the personalised approaches that current provision is able to offer. The importance of continuing to tailor provision to the needs of individuals was a clear message in the consultation feedback and school leaders were able to explain that this approach, proven to be effective, would be maintained. Some respondents were very supportive of the council's rationale for creating larger organisations which could operate more flexibly and make the best use of resources. Strategic leaders in particular acknowledged that even at the new pupil numbers, they would not constitute large schools, compared to both similar provision in neighbouring LAs and the national picture and would offer exciting opportunities to do things differently.

5.5 The combination of schools to create the hubs

Whilst recognising the need to create larger schools with greater opportunities for flexibility and efficiency, some respondents questioned the rationale for bringing together the schools in the combinations which the proposals put forward. A small number suggested alternatives, for example bringing together Cedar Centre and Downs Park, whose pupil populations were felt to be similar, alongside a merged Hillside and Downs View would be a preferred option. This had been considered at an earlier stage of the review debate but not favoured, as it limited parental choice further and did not make best use of the benefits arising from the geographical location of the existing schools.

Cedar Centre and Downs Park have historically been part of a Federation of three schools, but this model has not enabled them to maintain an even balance of pupil numbers.

5.6 Inclusion

The proposal to bring together a wider range of pupils with special educational needs in one hub created considerable debate. Those who supported the concept of inclusion in its broadest sense had no problem with this. However, others did not want the pupils either across the whole age range or with different needs to mix together. There was a difference in opinion about the apparent disparity between the council's commitment to inclusion and the extension of the age ranges of the new provision, although it was recognised that this increased the options available to parents. Concern was expressed about how the admission of very young children, particularly to SEMH provision, might lead to early 'labelling' of children, which was felt to be undesirable. Some parents were worried that resources might come under pressure by the demands of those with profound and multiple learning difficulties, or that the needs of those deemed less complex might be overlooked. Some health colleagues in particular suggested that the schools should be brought together according to need, rather than locality. However, the council continues to have a legal duty to meet the needs of all pupils with special educational needs and disabilities. There is confidence, based on the experience of other LAs who have developed similar provision that this can be achieved very successfully in schools with a wider range of needs. There are a number of ways in which this can be managed- by the creative use of sites, a range of groupings according to learning style, pupil need and social, emotional and communication issues. The city's current PRU provision for primary and Key Stage 4 is effectively managed on the same site, but with separate accommodation and entrances, and offers one model of using sites creatively. Some parents who have opted to educate their children with very complex needs in mainstream were keen that consideration be given to them being able to access the wider range of services which are planned to be developed within the hubs.

5.7 The breadth of the new provision

Some parents were anxious that the needs of those pupils on the autistic spectrum were not being sufficiently addressed within the proposed changes. The current special schools all have pupils with a diagnosis of autism and this will continue. The council also plans to develop a new Special Facility in a mainstream secondary school to enable the needs of those with a range of communication difficulties to be met. It is planned that this should open in September 2018. Additionally the LA is looking to create a small specialist unit within one of the hubs for the small number of more able pupils with autism/Asperger's syndrome, whose challenging behaviour or mental health needs mean that they cannot cope in a mainstream school. The hubs should be able to offer a wider range of curriculum opportunities than previously available through smaller schools and this is likely to result in a curriculum that is more tailored to the ability, needs and interests of pupils than ever before,

including those on the autistic spectrum. Respondents were keen that a wide range of accreditation options would be available in the new hubs, so that individual students could explore their talents fully, and gain qualifications according to their potential. PRU pupils were particularly keen to access a wider and more creative curriculum than at present, with improved facilities, and the creation of the SEMH hub is intended to offer increased flexibility by giving specialist staff the opportunity for staff development to work across different cohorts.

5.8 Post 16 provision

This was an area of the consultation which solicited strong views. There was little disagreement to the proposal to extend opportunities for provision beyond the age of 16. However, there was a range of views about what this might look like and who could offer this provision. Existing providers of post 16 provision for those with the most severe and complex needs preferred that this provision should be expanded to retain a citywide provision for this cohort of students, although it was recognised that the numbers of students would exceed the capacity of the current building. There was considerable support from those mostly closely linked with the west and citywide SEMH hubs that the creation of post 16 provision elsewhere would enable there to be a broader range of models and thus offer different pathways to adulthood. It is intended that the new provision delivered via the west and citywide SEMH hubs should focus more on enhancing opportunities for those who could access local college courses or pathways to employment with the right level of specialist help, thus creating joint ventures with other providers. It was acknowledged that the original proposal created some inequality in the proposed age ranges for post 16 provision and the LA has addressed this in response to the views expressed during the consultation. The proposed age range for the SEMH and west hub is now extended to aged 19.

5.9 Closer working between the Pupil Referral Unit and Homewood College

The principles behind closer working between these two LA provisions received support. Whilst many saw the benefits of closer working, some were concerned about what this would mean in practice. The need to limit the number of pupils with SEMH on one site was highlighted as important to maintaining a productive learning environment, and utilising more than one site was felt to be key to the hub being able to effectively meet the diversity of need of pupils with SEMH. Linking the newly merged PRU and Homewood College to form the new SEMH hub will enable a more flexible response to meet the LA's responsibilities towards those whose challenging needs limit their ability to access mainstream schools. The significant rise in the number of exclusions in the last year has presented a significant challenge to the LA to meet its statutory responsibilities with the existing configuration of services. The merger of the two Pupil Referral Units does not require a statutory notice to achieve the change in model, although the governance arrangements for future working will need to be established appropriately, for which negotiations between governors and the members of the management committees have already begun. The views of many respondents reinforced the need for the LA

to carefully consider the appropriate use of sites to accommodate different aspects of social, emotional and mental health needs. This will be a key consideration in planning the operational structure and management of the SEMH hub.

5.10 Integrated working

Meeting the holistic needs of pupils through working effectively together was rated as the one of the highest priorities at an earlier stage in the SEND review. Many respondents agreed that this would be a significant benefit of how the hubs would deliver what pupils need. The allocation of the proposed additional £300,000 across the 3 hubs for therapies and health services was welcomed. There was support for a greater role for school leaders in joint commissioning what services can be provided, and how they might best be integrated into the hub's core offer. Early work has begun with key partners to plan for any changes that might be necessary to secure joint planning and delivery of services.

5.11 Admissions

Some parents whose children do not currently attend their most local special school were anxious that they would be required to move their child to the hub closest to their home address. This consultation does not propose any changes to the admission arrangements to special provision. The LA would always look to place a child in their most local school, if that school is able to offer provision appropriate to a child's needs. However, parents still have a right to express a preference, and the LA is obliged to comply with that preference as long as it would not be unsuitable for the age, ability, aptitude or SEN of the child or young person, or the attendance of the child or young person there would be incompatible with the efficient education of others, or the efficient use of resources. A very small number of pupils have dual placements with mainstream schools, and the new hub arrangements do not change the city's policy and practice on these. Hubs will be encouraged to develop increased opportunities for links with mainstream schools.

5.12 Transport

Some parents had queries about entitlement to home to school transport, and how this might impact on which hub a child might attend, as well as the options available to families, particularly in relation to services which might be offered via the hubs in future. The council's policy on home to school transport does not form part of this consultation. However, transport arrangements will need to be considered carefully when the hubs develop an extended day, to ensure that equalities principles are upheld.

5.13 Traffic

Concerns about the impact of the creation of the hubs on local traffic were raised by a small number of respondents. As the number of children attending our special provision is not likely to change significantly, it is not envisaged

that there will be an increase to the traffic involved in transporting pupils between their home and the hub. However, alterations to site access and car parking will form part of the discussions about the improvements to the new hub sites.

5.14 Sites

Many comments were received about the location of the new provision. A number of queries emerged about the future use of current sites. No sites in current use are likely to be relinquished until it is decided that a site is no longer needed. Respondents acknowledged that some sites are no longer fit for purpose (ie Dyke Road KS3 Pupil Referral Unit, which lacks outside space and accommodation which restricts the curriculum able to be offered there). Others will need refurbishment or new buildings. £7.5 million capital funding has been secured to spend on the improvements necessary to enable the three hubs to have the appropriate facilities to meet the needs of their new pupil population, although some doubted whether this would be sufficient. The need for the SEMH hub to be based across a number of different sites was a strong message, as SEMH encompasses both a very diverse range of needs and different patterns of provision depending on whether a pupil has an Education, Health and Care plan (EHCP) or is excluded, for example. The LA intends to address the issues about sites sensitively, working closely with colleagues in the property team to make the most creative use of available accommodation and the additional capital funding.

5.15 Funding

There was some scepticism about the financial case for change, a few suggesting that the proposed changes were merely a budget saving exercise. Making the proposed changes will enable the available funding to be used more efficiently and effectively, so that the city's special provision is sustainable into the future. The status quo is not an option, as there are significant budget deficits across a range of provision which can no longer be netted off against historic balances or bridged by additional funding from the LA. This was a strong message to staff and parents at consultation events. It is not yet clear exactly how the new funding changes at national level would impact on the city's special provision, but school leaders were positive that a larger number of pupils in each hub and thus larger budgets would give them optimum flexibility to make the best use of available resources.

5.16 Staffing

Whilst many saw that the creation of the new hubs and the extension of provision in some hubs to include early years and post 16 provision might create new professional opportunities for staff, and some staff welcomed this, it was recognised that changes to the staffing structures in the hubs might also mean seeking economies of scale over time and this would impact on staff job security. The presence of union representatives at consultation meetings with staff groups gave them confidence that the appropriate HR processes would be put in place to manage any changes. There was a widespread view that

the expertise within the city's current provision was highly valued and should be retained if at all possible. The attendance of governors at consultation events also gave them the opportunity to reinforce their intention to exercise sensitivity in the management of any change. Clarification was given at consultation events that the LA's role was strategic in the creation of the new model of provision, with the responsibility for developing an appropriate staffing and operational structure laying with the governing body.

- 5.17 There were a number of issues raised, which whilst not the focus of the immediate issues of the consultation, were important to capture, so that they can be raised in ongoing review discussions. The new hub leaders will also be provided with further details about this consultation feedback and the LA intends to establish some principles as a foundation for the ongoing development of the hub and set out the expected outcomes of the redesigned provision.

6. Further considerations

6.1 How can greater efficiency be achieved in the SEMH hub?

A governing body has responsibility for ensuring that the allocated budget is managed efficiently, whilst ensuring that the needs of pupils are met. The management committee for the Pupil Referral Unit will have a parallel responsibility. The creation of the hub will not change this, but an increased number of pupils within one organisation and a larger budget are likely to be able to offer greater flexibility to manage within budget, particularly at times of particular financial challenge. The status quo is not an option in the current financial climate, as the LA is no longer able to sustain the further allocation of additional funding to balance the school's (or the PRU's) budget. Money saved from any economies of scale that the governing body can achieve could be reinvested into the hub and focussed on their priorities.

6.2 How will current pupils at Homewood College be affected by the proposed changes?

There will be a long lead in time to develop the new hub, so that any change can be planned and implemented sensitively, with minimal disruption to pupils. It is intended that the existing Homewood site will be the base for the new SEMH hub. Thus current pupils will be able to remain on their existing site with their peer group and familiar staff for the immediate future and their travel arrangements will not change. The LA intends to use a proportion of the £7.5million capital money set aside for the redesign of special provision to refurbish the current Homewood College site to improve accommodation and facilities. In the new hub pupils will undoubtedly benefit from broader curriculum opportunities, both during and beyond the school day alongside their core National Curriculum entitlement. Improvements to the learning environment on the new school site from the allocated capital money to support the implementation of the proposals will be of direct benefit to pupils. The availability of an additional £300,000 across the hubs for health and therapy services will enable more joint commissioning of services closely

matched to the needs of individual pupils and the hub's priorities. This will enable the hubs to meet the needs of their pupils more holistically.

6.3 What will happen to the staff currently working at Homewood College?

The governing body will have responsibility for the appointment of the leadership team of the SEMH hub, including the executive headteacher. Thereafter, the staffing structure is likely to be developed over time in order to support the desired ethos of the new hub. The Local Authority very much values the experience and expertise of those working at both Homewood College and the Pupil Referral Units and shares the wishes of governing bodies and management committee to retain these within the city as far as possible. In time, school leaders may make changes to how staff are deployed, as any school might when they keep their provision under review. It is likely that a wider organisation will be able to sustain the employment of a broader range of staff with a specialist subject expertise which will be of direct benefit to pupils.

Once the period of consultation is over, all staff affected by the change will have access to individual meetings to discuss their futures and any opportunities available. Union representatives were present at staff consultation events to reassure staff of their support and fair application of the council's employment policy and practice.

In terms of staff wellbeing at a difficult time, Public Health have offered a range of support services to staff and some funding for staff to organise support for themselves.

6.4 What impact will the changes have on the community?

Homewood College has been an integral part of the city's special school community over the years and there is no reason to believe that their positive links in the locality will not be retained and built on. They also have longstanding professional relationships with other special provision across the city and these will also continue within the new model of the city's provision, when the Pupil Referral unit comes together with Homewood College to create the new SEMH hub.

7 THE OUTCOME OF THE CONSULTATION

- 7.1 All responses to the consultation on the creation of the new hubs have been carefully reviewed, alongside three other significant elements of consideration:
- an analysis of the current model of provision in the city which does not reflect the present pattern of need and demand for places
 - the support for change evident during the review process
 - the analysis of the current and future budget position
- 7.2 There are significant budget pressures facing all schools at this time. These have been brought about by cumulative cost pressures, such as pay rises and

higher employer contributions to national insurance and pension schemes. At the end of the 2016/17 financial year special school budgets in Brighton and Hove showed a net overspend of £164,000, with three of the eight schools being in an overspend position. Some schools had been able to draw on historic underspends to avoid going over budget because of spiralling costs, but this is no longer sustainable. There is a considerable challenge for these schools to bring their budgets back into balance and it is likely that licensed deficit arrangements will be necessary. The economies of scale that should be delivered through the SEND Review and specifically the redesign of the special schools and Pupil Referral Units will better enable schools (hubs) to achieve balanced budgets.

- 7.3 In response to the consultation feedback the LA has made two changes to the original proposals. The proposed upper age range of the west and SEMH hubs has been adjusted from 18 to 19 and thus creates parity across the city. Secondly, the proposed designation of the east and west hubs has been changed from 'learning difficulties' to 'severe and complex needs'.
- 7.4 The LA has considered the consultation feedback carefully and where there are concerns about the new model of provision, every effort will be made to allay concerns and ensure a smooth transition to the new model for all children. A number of related issues were also raised during the consultation which were not the focus of these specific proposals and these will be considered as the review progresses. The new hub leaders will also be provided with further details about the consultation feedback. The LA intends to draft a statement of principles as a foundation for the ongoing development of the hubs and set out the expected outcomes of the redesigned provision.
- 7.5 It is acknowledged that there were a range of views on the proposals. However taking everything into account, it is felt that to move forward with the proposals to create the hubs would mean the following benefits for the city:
- a) each hub will be able to provide a holistic package of support for pupils and their families through a much more integrated offer across education, health and care/respite on site
 - b) proposals respond to feedback from families that they want to see better coordination across education, care and health so that personalised plans for children have a unified set of objectives and outcomes
 - c) the integrated hub model supports families to build resilience and stay together by:
 - a better extended day/short break offer where needed
 - direct support to families at home where children have challenging behaviour or very complex needs
 - d) the availability of provision within the city which can offer a holistic package for children with multiple needs will reduce the need to resort to expensive out of city placements
 - e) parents can be assured that high quality education can be maintained in all hubs, as each hub would consist of a school which has been consistently rated as outstanding and one as good

- f) proposals extend the age range to 19 at all three hubs and allow for more support in the transition to adulthood where needed
- g) best value would be achieved through the largest proportion of funding focussed on pupils and front line services, made possible by a streamlined management structure being in place
- h) the hubs would have sufficient pupils to guarantee financial viability in the future
- i) there would be greater economies of scale when commissioning health and care services
- j) proposals allow for £7.5m to be spent on upgrading the remaining sites
- k) proposals that merge special provision reflect newer successful models of best practice around the country, including that in neighbouring LAs.

7.6 The LA has considered the views expressed carefully and acknowledges that where there was positivity about the principles and vision for the new model of provision, anxieties remain about operational detail. Where real concerns exist, every effort will be made to mitigate these, so that there is no negative impact on pupil outcomes.

7.7 As a result of the feedback from the consultation, the LA has reconsidered the detail of the proposals and has made two changes in the recommendations going forward:

- (i) Extending the upper age range of the west and SEMH hubs from 18 to 19, to create parity across the city
- (ii) Changing the designation of the east and west hubs from 'learning difficulties' to 'severe and complex learning difficulties'

7.8 The principles behind the proposal to create three integrated hubs from our current provision as outlined in this report have the support of:

- The four governing bodies concerned – Hillside, Downs View, Homewood College and the CDP Federation (Cedar Centre, Downs Park and Patcham House)
- The management committees of the two PRUs – Brighton and Hove PRU and the Connected Hub
- The headteachers of Hillside and Downs View Schools and the Acting Executive Headteacher of the CDP Federation
- The Clinical Commissioning Group (specifically community paediatrics and children's mental health).
- The Parent Carers' Council (PACC)

8. Where and when the statutory notice and full proposal information will be available?

Brighton & Hove City Council will publish the statutory notice for this proposal on Friday 30th June 2017. The notice will remain in force for a period of 4 weeks i.e. until Friday 28th July 2017. Copies of the notice will be placed:

- at the entrance to Homewood College
- in other places in the community; namely the local Post Office, local Library and the Jubilee Library

It will also be published in The Brighton & Hove Independent newspaper on 30th June 2017.

A copy of the statutory notice is attached to this document.

On Friday 30th June 2017 the full proposal information (this document plus appendices) will be sent to the following recipients:

- The governing body responsible for Homewood College
- The management committee of the Pupil Referral Unit
- Members of the Children, Young People and Skills Committee
- Local Ward Councillors
- The Members of Parliament for Brighton & Hove
- The parents/ carers of every registered pupil at Homewood College

It will also be published on the council's website at the following address www.brighton-hove.gov.uk/school-statutory-notice.

Any person may request a copy of the full proposal information either by writing to Edd Yeo at:

Brighton & Hove City Council
Room 116 Hove Town Hall
Norton Road
Hove BN3 3BQ

or by contacting him on 01273 294354 or via email at edd.yeo@brighton-hove.gov.uk.

9. How to make representations or comment on the proposal

Any person may object or make a representation or comment on the proposal. This can be done by writing to:

Regan Delf, Assistant Director Health, SEN and Disability
Brighton & Hove City Council
2nd Floor, Hove Town Hall
Norton Road
Hove BN3 3BQ

before the closing date of 28th July 2017
or via email to her at regan.delf@brighton-hove.gov.uk

Following the closing date for representations, comments and objections, a report will be prepared for Children, Young People and Skills Committee to decide the proposal within two months i.e. no later 29th September 2017. At the present time it is anticipated that the report will be considered at their meeting scheduled for 18th September 2017.

[Appendix 1 Link](#)

