

# Aberdeenshire Council

## Integrated Impact Assessment

### Reduction in SFL Teachers

Assessment ID	IIA-001081
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# 1. Overview

This document has been generated from information entered into the Integrated Impact Assessment system.

Aberdeenshire is in the process of undertaking a strategic review of the structures, systems and services that underpin Aberdeenshire's approach to meeting additional support needs to ensure that they align with the recommendations of the national ASN Review (2020), and that they are responsive, flexible, equitable, future-fit and best value. Following extensive stakeholder feedback the improvement themes are as follows:

1. Mapping of children and young people with significant and complex learning needs to ensure there is sufficient specialist provision across Aberdeenshire
2. Realign ASN budgets to support a core staffing formula for complex needs provisions which are integrated within mainstream schools to bring greater parity with freestanding special schools
3. Review the accessibility brief for complex needs provisions which are integrated within mainstream schools to bring greater parity with freestanding special schools
4. Realign ASN budgets to strengthen the enhanced provision outreach support offered to children with additional support needs within mainstream provision
5. Realign ASN budgets to support greater mainstream inclusion of children in the early years
6. Workforce review to build capacity to meet additional support needs, particularly in areas of Aberdeenshire which are hardest to recruit to.
7. A comprehensive ASN professional learning strategy for the education workforce
8. Investment in whole school inclusive practices

A reduction in ASN budget will impact items 2, 4 and 5. Whilst other areas of ASN improvement work will continue, the negative impacts of a cut to ASN budget cannot be fully mitigated against. The longer-term benefits of the ASN Review will be significantly diminished. Consequently, there is a risk of more children and young people being placed in out-of-authority specialist education placements, which in the longer term will place greater pressure on the ASN budget. Further, this carries the risk of exacerbating existing social inequalities as those children and young people accessing these high cost out-of-authority placements are not necessarily those with the greatest level of need, but rather, those who are advantaged by the determined advocacy of parents and carers or representational groups.

During screening 5 of 10 questions indicated that detailed assessments were required, the screening questions and their answers are listed in the next section. This led to 2 out of 5 detailed impact assessments being completed. The assessments required are:

- Children's Rights and Wellbeing
- Equalities and Fairer Scotland Duty

In total there are 0 positive impacts as part of this activity. There are 7 negative impacts, all impacts have been mitigated.

A detailed action plan with 1 points has been provided.

This assessment has been approved by [vincent.docherty@aberdeenshire.gov.uk](mailto:vincent.docherty@aberdeenshire.gov.uk).

The remainder of this document sets out the details of all completed impact assessments.

## 2. Screening

Could your activity / proposal / policy cause an impact in one (or more) of the identified town centres?	No
Would this activity / proposal / policy have consequences for the health and wellbeing of the population in the affected communities?	No
Does the activity / proposal / policy have the potential to affect greenhouse gas emissions (CO2e) in the Council or community and / or the procurement, use or disposal of physical resources?	No
Does the activity / proposal / policy have the potential to affect the resilience to extreme weather events and/or a changing climate of Aberdeenshire Council or community?	No
Does the activity / proposal / policy have the potential to affect the environment, wildlife or biodiversity?	No
Does the activity / proposal / policy have an impact on people and / or groups with protected characteristics?	Yes
Is this activity / proposal / policy of strategic importance for the council?	Yes
Does this activity / proposal / policy impact on inequality of outcome?	Yes
Does this activity / proposal / policy have an impact on children / young people's rights?	Yes
Does this activity / proposal / policy have an impact on children / young people's wellbeing?	Yes

## 3. Impact Assessments

Children's Rights and Wellbeing	No Negative Impacts Can Be Mitigated
Climate Change and Sustainability	Not Required
Equalities and Fairer Scotland Duty	No Negative Impacts Can Be Mitigated
Health Inequalities	Not Required
Town Centre's First	Not Required

## 4. Childrens' Rights and Wellbeing Impact Assessment

### 4.1. Wellbeing Indicators

Indicator	Positive	Neutral	Negative	Unknown
Safe			Yes	
Healthy			Yes	
Achieving			Yes	
Nurtured			Yes	
Active		Yes		
Respected		Yes		
Responsible		Yes		
Included			Yes	

### 4.2. Rights Indicators

<p><b>UNCRC Indicators upheld by this activity / proposal / policy</b></p>	<p>Article 5 - Parental guidance and a child's evolving capacities            Article 7 - Birth registration, name, nationality, care            Article 8 - Protection and preservation of identity            Article 9 - Separation from parents            Article 10 - Family reunification            Article 11 - Abduction and non-return of children            Article 12 - Respect for the views of the child            Article 13 - Freedom of expression            Article 14 - Freedom of thought, conscience and religion            Article 15 - Freedom of association            Article 16 - Right to privacy            Article 17 - Access to information; mass media            Article 18 - Parental responsibilities and state assistance            Article 19 - Protection from all forms of violence            Article 20 - Children deprived of a family            Article 21 - Adoption            Article 22 - Refugee children            Article 25 - Review of treatment in care            Article 26 - Social security            Article 27 - Adequate standard of living            Article 30 - Children of minorities / indigenous groups            Article 32 - Child labour            Article 33 - Drug abuse            Article 34 - Sexual exploitation            Article 35 - Abduction, sale and trafficking            Article 36 - Other forms of exploitation            Article 37 - Inhumane treatment and detention            Article 39 - Recovery and rehabilitation of child victims            Article 40 - Juvenile justice            Article 42 - Knowledge of rights</p>
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### 4.3. Negative Impacts and Mitigations

Impact Area	Details and Mitigation
<p><b>Achieving</b></p>	<p>The National ASN Review (2020) emphasised that there should be no reduction in aspiration and ambition for children and young people with additional support needs. Qualifications are not relevant learning objectives for all children and young people, and achievement measures must go beyond the current narrow parameters of attainment and qualifications. Measures must value and ensure visibility of the diverse range of achievements, including vocational learning, that are possible for all children and young people with additional support needs, and reflect what they and their families feel are important for their future quality of life. A reduction in ASN budget will have an impact on the staff available to deliver this.</p> <p>Can be mitigated                      Yes</p> <p>Mitigation                      The ASN review will help mitigate against this if the existing budgets are preserved and realigned to support improvements.</p> <p>Timescale                      August 2024</p>
<p><b>Healthy</b></p>	<p>Since the pandemic greater numbers of children and young people than ever before are experiencing poor mental health. Specialist mental health services are under extreme pressure, resulting in children with high levels of need relying heavily on education staff for support. A reduction in ASN budget will have an impact on the staff available to provide this support, which is likely to further exacerbate the current mental health crisis.</p> <p>Can be mitigated                      Yes</p> <p>Mitigation                      The ASN review will help mitigate against this if the existing budgets are preserved and realigned to support improvements.</p> <p>Timescale                      August 2024</p>

Impact Area	Details and Mitigation
<p><b>Included</b></p>	<p>The presumption of mainstream education has been enshrined in law for over 20 years (Standards in Scotland's Schools Etc Act 2000). Whilst significant progress has been made in terms of inclusive practice in the intervening time, publications of reports such as, "Not Included, Not Engaged, Not Involved" (Children in Scotland, 2018), and #IncludED in the Main?!" (Enable Scotland, 2020), suggest the experience of inclusion can be variable within the Scottish Education System. This was evidenced by the findings of the National ASN Review, which concluded that, "the evidence does not support the assumption that all individual professionals are signed up to the principles of inclusion and the presumption of mainstreaming" and "currently, far too many children and young people report feeling isolated, lonely, rejected, and sometimes actively disliked or uncared for". The prevailing narrative across Aberdeenshire schools is that they are seeing an increase in the number of children with additional support needs, and an increase in the significance and complexity of those needs. Related to this, Aberdeenshire enhanced provisions and community resource hubs are describing a situation where demand for places outweighs availability, and the talk has turned to waiting lists, capping numbers, reviewing staff to pupil ratios, and increasing staffing allocations. There has been an increase in parental placing requests for out-of-authority independent special schools, consistent with national trends. A reduction in ASN budget will significantly impair the essential improvements required to change this trajectory. A core feature of the Aberdeenshire ASN review is the realignment of ASN budgets to strengthen universal and specialist ASN provisions to ensure children and young people are well supported in their local schools.</p> <p>Can be mitigated                      Yes</p> <p>Mitigation                              The ASN review will help mitigate against this if the existing budgets are preserved and realigned to support improvements.</p> <p>Timescale                                August 2024</p>

Impact Area	Details and Mitigation
Nurtured	<p>In recent years Aberdeenshire has invested heavily in the roll-out of universal and targeted nurture training for schools. Universal nurture approaches are attachment-led, trauma-informed practices that support the wellbeing of all children and young people. Targeted nurture interventions provide bespoke support to children and young people who have experienced childhood adversity and early developmental trauma. A reduction in ASN budget will have an impact on the staff available to deliver this, which will have an impact on the safety and wellbeing of pupils and staff.</p> <p>Can be mitigated Yes</p> <p>Mitigation The ASN review will help mitigate against this if the existing budgets are preserved and realigned to support improvements.</p> <p>Timescale August 2024</p>
Safe	<p>Since the pandemic greater numbers of children than ever before are experiencing high levels of emotional dysregulation, which can result in distressed, aggressive or violent behaviours. Close supervision from a skilled, familiar adult is essential to help prevent and de-escalate situations. A reduction in ASN budget will have an impact on the staff available to provide this, likely leading to an increase in incidents that compromise the safety of pupils and staff.</p> <p>Can be mitigated Yes</p> <p>Mitigation The ASN review will help mitigate against this if the existing budgets are preserved and realigned to support improvements.</p> <p>Timescale August 2024</p>

#### 4.4. Evidence

Type	Source	It says?	It Means?
Internal Consultation	Head Teacher Survey; Focus groups with 14 Community Resource Hub Schools and 32 Enhanced Provision Schools	Concerns raised re increasing numbers of children and young people with additional support needs and insufficient staffing to meet those needs. This is particularly exacerbated in areas of Aberdeenshire which find it hard to recruit teaching staff.	Workforce review required to ensure that sufficient numbers of suitably trained staff are available across Aberdeenshire to support children and young people with additional support needs. This includes realigning SFL Teacher underspends to invest in non-teaching support staff.

Type	Source	It says?	It Means?
External Data	National ASN Review (Morgan, 2020)	Children and young people with additional support needs are not sufficiently visible or valued in the Scottish education system. The implementation of the ASL legislation is over-dependent on committed individuals, is fragmented and inconsistent and is not ensuring that all children and young people who need additional support are being supported to flourish and fulfil their potential.	Significant improvements are required to ensure that children and young people with additional support needs are fully supported to access a full and meaningful curriculum suited to their needs
External Data	National Publications	"Not Included, Not Engaged, Not Involved" (Children in Scotland, 2018); #IncludedED in the Main?!" (Enable Scotland, 2020) indicated that a number of children and young people with additional support needs in Scotland are not being adequately supported to access a full and appropriate curriculum, and are often socially, emotionally and academically marginalised.	Improvement work is required to ensure the meaningful inclusion of all children and young people in education
External Consultation	Parent Survey	Whilst the survey highlighted that there is strong inclusive practices in many Aberdeenshire Schools, it was also clear that a proportion of parents of children with additional support needs do not feel their children are well supported, often due to a perceived lack of resources.	Improvement work is required to ensure that all children and young people with additional support needs are supported to access a full and meaningful curriculum, and that parents do not feel they have to "fight" to access resources for their children. Improvements are required to enhance consistency of inclusive practice across Aberdeenshire.

Type	Source	It says?	It Means?
External Consultation	Focus Groups with external partners (Social Work, CAMHS, Speech & Language Therapy, AHPs)	Examples of inclusive practice were identified across Aberdeenshire but equity of provision is variable across Aberdeenshire	Investment is required to create greater parity between freestanding special schools and integrated community resource hubs. Improvements are required to enhance consistency of inclusive practice across Aberdeenshire.
Internal Data	Parental Placing Requests	Parental placing requests for special schools have increased in the last year, including requests for high cost, out-of-authority placements. This mirrors national trends.	Improvement work is required to ensure that children and young people are well supported within local authority provision.
Internal Data	Exclusion data	The rate of school exclusion for pupils with an Autism Spectrum Disorder in Aberdeenshire (49.9 per 1000 pupils for 2021/22) is significantly higher than the rate of school exclusion for non disabled pupils (15.4 per 1000 for 2021/22). This mirrors national trends.	Improvement work is required to ensure that pupils with autism spectrum have access to the right support in schools in order that they can fulfil their potential.

#### 4.5. Accounting for the Views of Children and Young People

Children and young people's views have not been taken into account within the proposal to reduce the SFL teacher budget.

#### 4.6. Promoting the Wellbeing of Children and Young People

The proposal to reduce the SFL teacher budget does not help safeguard, support and promote children and young people's wellbeing. The Aberdeenshire ASN Review aims to strengthen inclusive practices across Aberdeenshire, and ensure sufficient and consistent high quality specialist education provision to meet needs. As such, it will help to safeguard, support and promote children and young people's wellbeing. However, this is dependent upon the SFL teacher budget being realigned to support improvement work.

#### 4.7. Upholding Children and Young People's Rights

The proposal to reduce the SFL teacher budget does not directly uphold children and young people's rights.

#### 4.8. Overall Outcome

No Negative Impacts Can Be Mitigated.

Whilst it is accepted that there is no additional funding to support the Aberdeenshire ASN Review, it has been undertaken to-date with the agreement of the ECS SLT that ASN budget

underspends may be realigned to support improvement work. However, it is not possible to carry out child-centred, sustainable transformational change within the context of ever increasing need and a reduced budget. The assessment is therefore that to accept the proposed budget saving is likely to have a negative impact on children and young people with additional support needs. The outcome of this is likely to be more exclusions, more part-time timetables, less children achieving their potential, and more out-of-authority placing requests.

This has been submitted as part of a suite of possible savings to help alleviate the overall budget pressures, but the risks identified within this IIA cannot be mitigated against.

## 5. Equalities and Fairer Scotland Duty Impact Assessment

### 5.1. Protected Groups

Indicator	Positive	Neutral	Negative	Unknown
Age (Younger)		Yes		
Age (Older)		Yes		
Disability			Yes	
Race		Yes		
Religion or Belief		Yes		
Sex		Yes		
Pregnancy and Maternity		Yes		
Sexual Orientation		Yes		
Gender Reassignment		Yes		
Marriage or Civil Partnership		Yes		

### 5.2. Socio-economic Groups

Indicator	Positive	Neutral	Negative	Unknown
Low income		Yes		
Low wealth		Yes		
Material deprivation		Yes		
Area deprivation		Yes		
Socioeconomic background			Yes	

### 5.3. Negative Impacts and Mitigations

Impact Area	Details and Mitigation
Disability	<p>A reduction in ASN budget will have a negative impact on the ability of schools to support children with disabilities in their social, emotional and learning development, and their medical and personal care needs.</p> <p>Can be mitigated Yes</p> <p>Mitigation The ASN review will help mitigate against this if the existing budgets are preserved and realigned to support improvements.</p> <p>Timescale August 2024</p>

Impact Area	Details and Mitigation
<b>Socioeconomic background</b>	<p>A reduction in ASN resource carries the risk of exacerbating existing social inequalities as those children and young people accessing these high cost out-of-authority placements are not necessarily those with the greatest level of need, but rather, those who are advantaged by the determined advocacy of parents and carers or representational groups.</p> <p>Can be mitigated                      Yes</p> <p>Mitigation                      The ASN review will help mitigate against this if the existing budgets are preserved and realigned to support improvements.</p> <p>Timescale                      August 2024</p>

## 5.4. Evidence

Type	Source	It says?	It Means?
Internal Data	Exclusion data	During 2021/22 the Aberdeenshire rate of exclusion for non-disabled pupils (per 1000) was 15.4. By comparison the rate of exclusion for disabled pupils was 19.1 per 1000. This increased to 49.9 per 1000 for pupils with autism spectrum disorder.	Improvement work is required to ensure high quality education provision for children with disabilities.
Internal Data	Parental placing requests	Placing requests for high cost out-of-authority specialist education provision do not consistently correlate with internal data on levels of need. The children and young people accessing these high cost out-of-authority placements are not necessarily those with the greatest level of need, but rather, those who are advantaged by the determined advocacy of parents and carers or representational groups.	Children and young people from areas of deprivation may be doubly disadvantaged - firstly, by money being diverted from making improvements to local authority education provision towards high cost out-of-authority day education placements, and secondly, because they may not have access to the same levels of advocacy to secure such out-of-authority placements.

Type	Source	It says?	It Means?
External Data	National publications	"Not Included, Not Engaged, Not Involved" (Children in Scotland, 2018); #IncludED in the Main?!" (Enable Scotland, 2020) indicated that a number of children and young people with additional support needs in Scotland are not being adequately supported to access a full and appropriate curriculum, and are often socially, emotionally and academically marginalised.	Improvement work is required to ensure that children and young people with disabilities are supported to achieve their social, emotional and learning potential

## 5.5. Engagement with affected groups

Parental survey to gather the views of the parents of children with additional support needs. Information from Autism Strategy public engagement events.

## 5.6. Ensuring engagement with protected groups

Those with lived experience of autism were part of the Autism Strategy public engagement events.

Work is ongoing as part of Aberdeenshire's ASN review to gather the views of children and young people with disabilities.

## 5.7. Evidence of engagement

The improvement plan set out within the ASN Review has emerged from consultation with key stakeholders.

## 5.8. Overall Outcome

No Negative Impacts Can Be Mitigated.

Whilst it is accepted that there is no additional funding to support the Aberdeenshire ASN Review, it has been undertaken to-date with the agreement of the ECS SLT that ASN budget underspends may be realigned to support improvement work. However, it is not possible to carry out child-centred, sustainable transformational change within the context of ever increasing need and a reduced budget. The assessment is therefore that to accept the proposed budget saving is likely to have a negative impact on children and young people with additional support needs. The outcome of this is likely to be more exclusions, more part-time timetables, less children achieving their potential, and more out-of-authority placing requests.

This has been submitted as part of a suite of possible savings to help alleviate the overall budget pressures, but the risks identified within this IIA cannot be mitigated against.

## 5.9. Improving Relations

The ASN Review aims to improve the experiences of all children and young people with additional support needs.

## **5.10. Opportunities of Equality**

The ASN Review aims to ensure equitable access to high quality education provision for all children and young people

# 6. Action Plan

Planned Action	Details
ASN Review	<p><b>Lead Officer</b> Carron Douglas</p> <p><b>Repeating Activity</b> No</p> <p><b>Planned Start</b> Monday January 10, 2022</p> <p><b>Planned Finish</b> Monday August 19, 2024</p> <p><b>Expected Outcome</b> The structures, systems and services that underpin Aberdeenshire’s approach to meeting additional support needs will align with the recommendations of the national ASN Review, and that they are responsive, flexible, equitable, future-fit and best value.</p> <p><b>Resource Implications</b> Whilst no additional resource is required, the success of this project is dependent upon the ability to preserve and re-align existing ASN budgets.</p>