

APPENDIX 2

EQUALITIES IMPACT ASSESSMENT

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Provision of Occupational Therapy under CYP with SEND EHCP.
DEPARTMENT:	Children and Young People and Community Development
TEAM:	Inclusion Service
LEAD OFFICER:	Roxanna Glennon – Head of Inclusion and SEND
DATE:	5 th August 2025

NB: Please ensure you have read the accompanying EA guidance and instructions in full.

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

This impact assessment relates to the direct award of a contract for the provision of Occupational Therapy (OT) supporting children and young people with Special Educational Needs and Disabilities (SEND) delivered by CLCH as the current contract is expiring on 31st August 2025.

The service relates to OT provision for children with OT specified in Section F of their EHCP in mainstream schools (5-19 years), ARPs and those in out of borough schools up to a 12 mile radius from Brent Civic Centre. Under the Children and Families Act 2014 local authorities have the statutory responsibility to meet the needs of children and young people as stated in Education Health and Care Plans (or Statements of Special Educational Need, as was the predecessor). This will often include occupational therapy.

The current OT contract in mainstream schools supports pupils attending Brent mainstream schools and pupils in some out of borough mainstream schools in Harrow, Ealing, Westminster and Barnet and a small number in further education colleges. The service provides therapy interventions, as well as guidance for staff in schools on how to implement programmes that assist functional and occupational development including day living skills and tasks. The service provides advice, guidance and training to improve parents' understanding of children's functional development. As the proposed new contract increases the scope of this contract, more children will be covered by this new contract.

2. Who may be affected by this policy or proposal?

Children and young with Special Educational Needs and Disabilities.
Parents/Carers

3. Is there relevance to equality and the council's public sector equality duty? If your answer is no, you must provide an explanation.

Yes

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age	x		
Sex		x	
Race		X	
Disability	x	X	
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity		X	
Marriage		X	

5. Please complete **each row** of the checklist with an "X".

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?	X	

Does the policy or proposal relate to an area with known inequalities?	X	
Would the policy or proposal change or remove services used by vulnerable groups of people?		X
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	X	
If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D.		

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

Under the Children and Families Act 2014, local authorities have a responsibility to meet the educational needs of children and young people as stated in a child or young person's Education Health and Care Plan (EHCP). It is estimated around 2 - 5% of the children and young people with additional needs have functional difficulties with day living tasks requiring specific assistance in order to have their needs met, including enabling children to access education. The evidence used to support this comes from Brent's comprehensive internal datasets, as well as data submitted to the Department for Education via the SEN2 return.

2. For each "protected characteristic" provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state "not applicable".

AGE	
Details of impacts identified	<p>The service will support children and young people with special education needs and disabilities who have an Education Health Care Plan (EHCP) who have OT specified in Section F of their EHCP.</p> <p>OT services seek to improve the functional and daily living skills of children and young people and to identify children with additional needs who would benefit from referral to further specialist services. The service will ensure that children and young people have their special educational needs met as appropriate regardless of their age and phase of education</p>
DISABILITY	
Details of impacts identified	<p>The service will support children and young people with special education needs and disabilities who have an Education Health Care Plan (EHCP) who have OT specified in Section F of their EHCP.</p> <p>OT services seek to improve the functional and daily living skills of children and young people and to identify children with additional needs who would benefit from referral to further specialist services. The service will ensure that children and young people have their special educational needs met as appropriate regardless of their age and phase of education.</p>
RACE	

Details of impacts identified	No specific impact
SEX	
Details of impacts identified	No specific impact.
SEXUAL ORIENTATION	
Details of impacts identified	No specific impact
PREGANCY AND MATERNITY	
Details of impacts identified	No specific impact
RELIGION OR BELIEF	
Details of impacts identified	No specific impact
GENDER REASSIGNMENT	
Details of impacts identified	No specific impact.
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	No specific impact

3. Could any of the impacts you have identified be unlawful under the Equality Act 2010?

No

4. Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?

Schools and key professionals have reported positive feedback on the OT service provided. Feedback has been incorporated into the review of services.

5. Please detail any areas identified as requiring further data or detailed analysis.

N/A

6. If, following your action plan, negative impacts will or may remain, please explain how these can be justified?

This is not anticipated. If any negative impacts did arise, these would be addressed through contract monitoring.

7. Outline how you will monitor the actual, ongoing impact of the policy or proposal?

Robust contract monitoring processes will be put in place to monitor outcomes and impacts and to inform future delivery. This includes regular feedback from service users, monitoring complaints and compliments received, service data analysis and contract monitoring meetings.

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

Establishing a new Direct Award contract for Occupational Therapy under the SEND Code of Practice 2015 – Children and Families Act 2014 is not expected to negatively impact on Children and Young People with Special Educational Needs and Disabilities as the service is a core statutory element of Section F in many plans.

The current incumbent provider will be required to maintain monitoring information which will be reviewed as part of quarterly contract monitoring processes. This will, alongside feedback from service users, inform any changes to service requirements.

SECTION D – RESULT

<i>Please select one of the following options. Mark with an "X".</i>		
A	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	X
B	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL	
C	CHANGE / ADJUST THE POLICY/PROPOSAL	
D	STOP OR ABANDON THE POLICY/PROPOSAL	

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date
Establish a clear implementation plan and contract review plan, working with stakeholders	To ensure successful mobilisation of the new contract	Roxanna Glennon and John Dunning	August / September 2025

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	John Dunning
REVIEWING OFFICER:	
HEAD OF SERVICE:	Roxanna Glennon