

# Equality & Poverty Impact Assessment 01061 (Version 1)

## SECTION ONE: ESSENTIAL INFORMATION

<b>Service &amp; Division:</b>	Children's Services Education		
		<b>Tel:</b>	07807701408
<b>Proposal:</b>	Proposed Changes to Enhanced Support	<b>Reference No:</b>	

What is the Proposal?	Budget & Other Financial Decision	Policy (New or Change)	HR Policy & Practice	Change to Service Delivery / Service Design
	No	Yes	No	Yes

Who does the Proposal affect?	Service Users	Members of the Public	Employees	Job Applicants
	Yes	No	Yes	No
	<b>Children and young people</b>	<b>Significant impact?</b>		
	Yes	Yes		
<b>Other, please specify:</b>				

Identify the main aims and projected outcome of this proposal (please add date of each update):	
17/08/2026	To strengthen Falkirk's approach to meeting Additional Support Needs by ensuring that every primary school can provide an appropriate level of enhanced support within its own community. This aims to reduce reliance on a limited number of Enhanced Provisions and to ensure all children can access timely, needs-led support closer to home
17/08/2026	To create a more equitable, sustainable and responsive system of ASN support across all 47 primary schools. This includes improving consistency in practice, widening access to skilled support, and enabling earlier intervention through stronger universal through to enhanced support pathways.
17/08/2026	To redistribute staffing and resources to better align with pupil need across the system. The aim is to ensure that staff are skilled across more schools, to deliver effective enhanced support - reducing pressure on individual EP sites and strengthening capacity at a whole-school level.
17/08/2026	To support inclusion and positive outcomes by reducing unnecessary transitions and enabling children to learn in their local community wherever appropriate, with the right supports, structures and planning around them.

Identify the main aims and projected outcome of this proposal (please add date of each update):	
17/08/2026	Projected outcome: If approved, this proposal would lead to an enhanced mainstream support model in all primary schools, supported by strengthened staffing, improved consistency of practice, and more equitable access to specialist approaches. No child would be moved without parental agreement and with appropriate planning. Transitions would be needs-led, carefully phased and informed by individual circumstances.

**SECTION TWO: FINANCIAL INFORMATION**

For budget changes ONLY please include information below:			Benchmark, e.g. Scottish Average
Current spend on this service (£'0000s)	Total:		
Reduction to this service budget (£'0000s)	Per Annum:		
Increase to this service budget (£'000s)	Per Annum:		
If this is a change to a charge or concession please complete.	Current Annual Income Total:		
	Expected Annual Income Total:		
If this is a budget decision, when will the saving be achieved?	Start Date:		
	End Date (if any):		

## SECTION THREE: EVIDENCE

Please include any evidence or relevant information that has influenced the decisions contained in this EPIA. (This could include demographic profiles; audits; research; health needs assessments; national guidance or legislative requirements and how this relates to the protected characteristic groups.)

### A - Quantitative Evidence

This is evidence which is numerical and should include the number people who use the service and the number of people from the protected characteristic groups who might be affected by changes to the service.

#### **1. Population and service users**

- Falkirk Council has 47 primary schools and 15 Enhanced Provisions (EP), educating approximately 21,000 primary-aged pupils.
- Approximately 280 children currently attend an Enhanced Provision (EP) and would be directly affected by the proposal.
- Over 5,000 pupils in Falkirk have an identified Additional Support Need (ASN) , including many who meet the Equality Act definition of disability.
- ASN profiles show rising levels of need across all localities, increasingly distributed across mainstream settings.

#### **2. Scale of potential impact**

- EP pupils may be directly affected by changes to support structures and transition planning.
- Approx. 11,200 primary pupils could be indirectly affected through strengthened universal and targeted support.
- Approx. 3,000 staff may be affected through training, deployment or school-level support changes.
- Families with disabilities, caring responsibilities or care experience are heavily represented and therefore key equalities groups.

#### **3. Demographic profile of respondents**

##### Age

- Most respondents aged 35–44 (31%), reflecting the parent/carer profile.
- 25-34 (13.4%) and 45–54 (14.7%) also strongly represented.
- Low representation of younger (under 24) and older groups.
- 29.3% did not answer.

##### Sex

- 55.4% female, aligning with national patterns of caregiver engagement.
- 7.1% male
- 4.5% prefer not to say; 32.9% no answer.

##### Ethnicity

- Majority White Scottish/British (approx. 46%).

- Minority ethnic participants included Asian (0.3%), Mixed (0.2%), African (0.1%), Arab (0.1%), Gypsy/Traveller (0.1%) and Chinese (0.1%).
- There is little evidence that the proposal disadvantages specific ethnic groups

#### Religion/Belief

- 26.9% no religion
- Christian denominations represented (Church of Scotland 8.8%, Roman Catholic 4.5%)
- Minority faiths: Muslim, Pagan, Buddhist, Sikh (<1% combined)

#### Disability / Health Conditions

- 9.6% reported a disability or long-term condition.
- Of those responding about daily impact:
  - 3.5% “a lot”
  - 5% “a little”
- Conditions lasting 12+ months included:
  - Physical disability (2.4%)
  - Mental health condition (3.8%)
  - Long-term illness (3.6%)
  - Developmental disorders (0.9%)
  - Learning disability/difficulty (approx. 1.6%)
  - Sensory impairments (0.8% combined)

This confirms meaningful representation of disabled adults, many of whom are parents of disabled children.

#### Caring responsibilities

- 26.3% provide unpaid care.
- 7% are primary carers of a disabled child.
- 5.2% provide 50+ hours of weekly care.

This is a significant group for equality impact considerations.

#### Care experience

- 12% identified as care-experienced - far higher than population averages.

#### Sexual orientation, gender identity, marital status

- Proportionate but small representation across LGBTQ+ and civil partnership groups.

- High non-response rate limits deep analysis.

#### Geographic spread

- Respondents came from all wards

#### **4. Protected characteristic implications:**

- Disability is the most significant protected characteristic affected, as the majority of EP pupils meet the Equality Act definition.
- Sex (male) is relevant due to national and local over-representation of males in ASN categories.
- Race/ethnicity representation was low but present; equality duties still apply, especially in relation to communication barriers and inclusion.
- Age applies to all primary pupils; transitions may impact younger children differently.
- Care experience is strongly represented in consultation and intersects with ASN needs.
- Pregnancy/maternity mainly applies to staff undergoing change.
- Sexual orientation/gender identity data low, but inclusive practice remains essential.

### **B - Qualitative Evidence**

This is data which describes the effect or impact of a change on a group of people, e.g. some information provided as part of performance reporting.

#### **Social - case studies; personal / group feedback / other**

Research evidence supporting the initial proposal:

##### **1. Professional Knowledge of the EP ERG Application Process**

Long-standing experience with staged interventions, early years planning and ERG referrals has consistently shown that the EP application process is a significant source of anxiety for families, particularly for children who are moving into the P1 stage. The 'uncertainty' of the process is a recurring theme in professional observations.

This is evidenced by past:

- Direct engagement with families during transition planning.
- Feedback from early years practitioners and primary schools
- Observed and conveyed anxiety from parents navigating the ERG cycles.
- Systemic delays inherent in the annual decision-making calendar due to P1 forward planning timescales and known availability of number of P1 EP spaces

Reports from parents frequently highlight a perceived need to 'fight' for a placement, which adds emotional strain to an already sensitive transition.

## **2. Findings from the ASL Review (Oct 2024 – Jun 2025)**

Data gathered during the ASL Review engagement period identified several systemic issues prior to the formal consultation:

- Inconsistency: notable variation in how schools approach Stage 3 needs, despite the positive work taking place across the authority.
- Family Concerns: frustration regarding differing levels of support between settings.
- Stability: a clear preference from both staff and parents to reduce the reliance on ERG panels, placing requests and school moves.
- Proactive Support: a demand for earlier intervention and more predictable communication.

This conclusion was not only rooted in earlier potential research and feedback but was directly reinforced through multiple strands of the recent review. The review provided clear, updated evidence that enhanced support can be successfully delivered in mainstream settings over time. This included:

- Findings from schools already implementing elements of enhanced support within mainstream, where positive learner outcomes were observed.
- Consultation feedback from staff, many of whom highlighted a growing skill set within mainstream settings .
- Analysis of pupil needs and existing support patterns, showing that a significant proportion of pupils who require enhanced support are already being educated in their catchment schools with appropriate scaffolding in place.
- Alignment with national policy expectations, such as the presumption of mainstreaming and staged intervention, which supports the development of sustainable, adaptable provision within local schools.

These components formed a robust evidence base demonstrating that - with appropriate staffing, resourcing, and phased implementation - mainstream settings are well placed to deliver enhanced support effectively.

## **3. Case Study Evidence and Existing Practice**

Internal case-study data gathered prior to the proposal demonstrates that the current model is not the only path to success. Evidence shows:

- A test<sup>2</sup>of<sup>2</sup>change approach demonstrated that enhanced support was effective for a broad range of pupils at Stage 3 - including those who did not receive an EP place as well as those who did. Most children remained successfully supported within their mainstream setting without needing to re<sup>2</sup>apply to ERG the following session showing that strengthened Stage 3 provision can meet needs across both groups.
- Schools with high internal capacity (experienced staff and small-group environments) successfully meet significant needs without an EP designation.
- Some current EP placements involve children whose needs could be met in a well-resourced mainstream setting, as advised by EP Head Teachers. We have

had parental requests to move children to full mainstream or catchment primary.

These findings support the move toward strengthening capacity across all schools to ensure a more equitable distribution of support.

#### **4. Awareness of Inclusion Barriers and Stigma**

Professional practice and discussions have highlighted different public perceptions regarding inclusion. It is recognised that:

- Children with significant needs are sometimes labelled as ‘too challenging’ for mainstream environments.
- This mindset fosters stigma, suggesting that children with sensory or dysregulation needs require specialised, separate settings.
- Limiting enhanced support to a small number of schools can unintentionally reinforce segregation.

The proposal aimed to address these barriers by fostering more inclusive mainstream practices and reducing the structural triggers for stigma.

#### **5. Known Limitations of the Current Model**

The rationale for change is based on a clear understanding of existing systemic flaws:

- Capacity: demand for EP spaces regularly exceeds the number of available places.
- Rigidity: the annual ERG cycle prevents a timely response to emerging needs.
- Inequity: whether a child stays in their catchment school is often determined by geography rather than individual requirements.
- Informal solutions: the rise of ‘shadow EPs’ and informal nurture bases indicates that schools are already attempting to fill gaps in the official model.

#### **6. Evidence-Based Vision**

The vision behind the proposal was established well before public engagement. It was grounded in ERG data and school-based evidence, focusing on:

- Reducing the burden: moving the emotional and administrative weight of applications away from schools and parents.
- Community Continuity: allowing children to remain with nursery peers/siblings in their local schools.
- Systemic Capacity: ensuring every school has the training and resources to provide high-level support.
- Immediate Response: transitioning to a model where support is proactive and available at the point of need, rather than being dependent on a change of school.



## **Consultation evidence/data:**

### **1. Children and Young People**

Pupil voice was captured across a wide range of Enhanced Provisions (Primary Schools A–F). Their feedback offered insight into both strengths of current support and what they fear or hope for in their educational provision.

Cross-cutting themes included:

- Trusted adults and emotional safety:

Children consistently highlighted the importance of strong, predictable relationships with staff. Many identified specific EP teachers or support staff as central to feeling calm, safe and understood. The recent review showed that these trusted adult relationships can be replicated in mainstream when the right training and approaches are consistently in place.

- Predictable routines, quiet spaces and low-sensory environments:

Children described the value of quiet rooms, sensory corners, smaller groups and structured routines. These features were often framed as essential to staying regulated and being able to learn. The review also demonstrated that mainstream settings can create calmer, more structured environments. This has been seen through use of targeted environmental adjustments, flexible groupings and strategic use of ‘enhanced support’ spaces.

- Impact of environment:

Several children said they liked being in EP because it was quieter, less crowded, and easier to manage. Some explicitly contrasted this with previous or larger settings.

- Confidence, belonging and identity:

Children expressed pride in their progress and relationships in EP. For others, being in EP reduced anxiety, helped them make friends, and gave them a core sense of belonging. With the right pastoral structures, consistent adult support and inclusive practice, mainstream settings can foster these feelings of confidence and belonging.

- Transitions:

Some children expressed anxiety about change. Even subtle shifts in staffing, routine or environment were described as ‘hard’, ‘confusing’, or ‘too much noise’. Mainstream settings have been seen to support these needs effectively by planning transitions carefully and providing additional scaffolding to maintain predictable routines – particularly during periods of change.

This evidence provides a strong child-centred perspective on the importance of trauma-informed practice, environmental adaptations, predictable routines and

relational safety.

## 2. Parents and Carers

Parents and carers play a central role in children's wellbeing, confidence and educational progress. The proposed model offers clear potential benefits for families, including stronger engagement with their local school, improved opportunities to build relationships with staff, greater involvement in school life and easier day-to-day routines when siblings can attend the same setting. By reducing distance, travel and separation from community networks, the model aimed to create more consistent communication, earlier support and a more connected experience for families.

Views from parents and carers were gathered through:

- Six focus groups across groups of EP and non EP parents
- Participate+ submissions
- Six public meetings
- A number of written representations
- Email correspondence and direct queries
- Organisational representations

Parents shared both their deep appreciation of current EP support and their high levels of concern around potential change.

Key themes included:

- Safety, regulation and sensory needs: Many parents highlighted the centrality of safe spaces, specialist environments, low-arousal rooms, and predictable routines for children who are autistic, have developmental delay, or experience dysregulation. Parents expressed strong concern that removing or diluting such environments could increase distress, aggression, or disengagement.
- Staffing, expertise and relationships: Parents repeatedly emphasised the importance of specialist staff - their experience, their understanding of trauma, and their skill in supporting communication. Several families described these relationships as "life-changing" for their child.
- Transitions and continuity: Concerns centred on potential disruption to children who struggle with change. Parents emphasised the emotional toll of transitions, particularly for disabled children and those with anxiety, trauma, or attachment needs.
- Equity, capacity and consistency: Parents felt that mainstream capacity varies and expressed worries about whether all schools would have the space, staffing, and training needed to support learners with significant needs in an equitable way.
- Communication and process clarity: While many valued the consultation, parents sought clearer explanations of timelines, the rationale for change, and how individual children would be protected.
- Appreciation of current EP provision: A significant number of parents praised EPs for providing stability, safety, progress, and improved wellbeing.
- Concerns that there would be an impact on future and current mainstream pupils.
- Some agreement with the final ambition and vision of the proposal.
- Where some did agree with the vision of the proposal, they however did not agree with the proposed changes to the EP model.

Many parents were themselves disabled adults, or had multiple caring responsibilities - equality considerations that were explicit in the qualitative evidence.

### **3. Staff**

Staff feedback was gathered via:

- Participate+ submissions
- 1 group written submission
- 2 staff only meetings

Key themes included:

- Training and professional learning:  
Staff emphasised the need for robust, ongoing training in autism, communication needs, dysregulation, trauma-informed practice, and complex behaviour.
- Capacity, sustainability and workload:  
Staff noted that supporting higher needs across all 47 primaries requires careful workforce planning, clarity of roles, and manageable expectations.
- Environment and building suitability:  
Staff raised concerns about noise levels, corridor layouts, room availability, and sensory environments in some schools.
- Clarity on Stage 4/ERG processes:  
Staff sought reassurance regarding the future of Stage 4 placements, and how the needs of the most complex learners would be met if changes were made to the EP model.
- Whole-school inclusion systems:  
Staff noted the importance of strong leadership, consistent staged intervention processes, and relational approaches across all schools if a system-level model were introduced.
- Some agreement with the final ambition and vision of the proposal.
- Where some did agree with the vision of the proposal, they however did not agree with the proposed changes to the EP model.

### **4. Partners, Organisations, and other views**

Partners, third-sector organisations, and other groups expressed themes including:

- The importance of transparent decision-making
- The need for clear communication about the rationale and evidence driving change
- Equity across wards, ensuring that pupils with the highest needs are supported regardless of postcode
- The significance of multi-agency collaboration in any new model
- Agreement with the ambition and a carefully managed change to the EP model

An organisational representation presented structured concerns around:

- resourcing,

- building suitability,
- staffing,
- equality of access across communities.

Elected members also engaged with the consultation, raising issues around scrutiny, service capacity, and community impact.

## 5. National and Statutory Guidance Informing Interpretation

Interpretation of the qualitative evidence was shaped by:

- The Additional Support for Learning (Scotland) Act 2004
- Equality Act 2010 and Public Sector Equality Duty
- Children and Young People (Scotland) Act 2014
- UNCRC principles
- Schools (Consultation) (Scotland) Act 2010
- Presumption of Mainstreaming guidance (2023)
- National evidence on inclusion, early intervention and rising complexity in ASN. E.g ASL Morgan Review (2020) and Scottish Government Additional Support for Learning Action Plan
- GIRFEC frameworks emphasising rights-based, needs-led decision making

These duties reinforce consideration of disabled children, care-experienced learners, carers, young children, and socioeconomically disadvantaged families.

### **Impact of the proposed change on these groups:**

The qualitative evidence gathered through the consultation highlights how any change to the current model could affect different groups in distinct ways.

For children and young people with disabilities, neurodivergence or complex needs, the themes emphasise that continuity of relationships, predictable routines, and access to quieter, adapted environments are central to their wellbeing, safety and ability to learn. A change in provision could therefore create heightened anxiety, increased dysregulation or difficulties with transition if not carefully and individually planned. However, there has been concern that support for current EP children would be diluted, this proposal would result in greater and wider access to highly effective enhanced support for a greater number of children.

Parents and carers - many of whom provide substantial care - described the potential emotional, practical and financial impacts of change. Their feedback indicates that uncertainty or loss of established supports may disproportionately affect families of disabled children, care-experienced children, or those managing multiple caring responsibilities. Concerns were also raised about the risk of unmet need if mainstream settings are not sufficiently resourced or trained.

For staff, the evidence suggests that any shift to a new model could impact workloads, confidence and professional demands. Staff identified the requirement for adequate training, environmental adjustments and clear processes to avoid changes placing additional pressures on both teaching and support staff. Conversely,

where staff felt well-supported, they saw opportunities for strengthened inclusion and earlier intervention.

Partners and organisations also identified wider system impacts, including the need for consistent multi-agency collaboration and equity of access across communities.

**Summary**

The qualitative evidence describes how the proposed change may have disproportionate effects on learners with disabilities, sensory or communication needs. However, these potential impacts can be carefully managed through personalised transition planning, stable trusted adult relationships, adapted environments, increased mainstream capacity and close multi-agency collaboration. The model is designed not to reduce support, but to expand high-quality enhanced support to more children, locally, and in a more equitable and sustainable way.

Best Judgement:	
Has best judgement been used in place of data/research/evidence?	No
Who provided the best judgement and what was this based on?	NA

<p><b>What gaps in data / information were identified?</b></p>	<p>While SEEMiS does record some protected characteristics - such as sex and ethnic background (as required for the annual Pupil Census) and holds an optional field for religion - not all protected characteristics are collected at pupil level. Sexual orientation and gender identity are not recorded for any pupils and schools are not required to routinely update optional fields such as religion. These data limitations apply to all pupils across the authority, not only those in Enhanced Provision, which restricts the level of detailed equality analysis that can be carried out.</p> <p>Some equality information on respondents was incomplete due to high levels of non-response in the monitoring questions on Participate+.</p> <p>The evidence gathered demonstrates that children experience success across different enhanced support models. While long-term quantitative data is still developing, consultation feedback and current practice show that pupils in both EP and strengthened mainstream settings to ensure effective planning for stage 3 support make progress when they have predictable routines, trusted adults, adapted environments and targeted interventions. This indicates that the core features of effective enhanced support can be delivered successfully through more than one model when planned and resourced appropriately.</p> <p>Variability exists in school-level environmental data (e.g. suitability of spaces, sensory environments), which makes direct comparison across schools more challenging.</p> <p>Pupil voice evidence was very rich in some settings but less detailed in others, particularly for children who communicate non-verbally and required facilitated methods.</p> <p>There is less quantitative data held on intersectional groups (e.g. disabled children who are also care-experienced or from minority ethnic backgrounds).</p>
<p><b>Is further research necessary?</b></p>	<p>No</p>

**If NO, please state why.**

The statutory consultation has generated a substantial and diverse body of evidence from children and young people, parents and carers, staff, partners, organisations etc. This includes a large Participate+ datasets gathered, extensive written representations, public meetings, focus groups, and multi-agency professional input.

Although some gaps exist in protected characteristic data and long-term outcome evidence, these gaps are not material to assessing the equality impacts of the proposal. The combination of quantitative data, qualitative feedback, professional judgement, national research and statutory guidance provides a robust and sufficient evidence base to understand potential impacts on equality groups and to inform decision-making without requiring additional research at this stage.

**SECTION FOUR: ENGAGEMENT****Engagement with individuals or organisations affected by the policy or proposal must take place**

<b>Has the proposal / policy / project been subject to engagement or consultation with service users taking into account their protected characteristics and socio-economic status?</b>	Yes	
<b>If YES, please state who was engagement with.</b>	<p>Engagement took place with a wide range of stakeholders, including:</p> <ul style="list-style-type: none"><li>• Children and young people across several Enhanced Provisions and mainstream settings, including pupils with disabilities, neurodivergence, communication needs and those requiring enhanced support.</li><li>• Parents and carers, including those of disabled children, care-experienced children, children with medical needs, and families experiencing socio-economic barriers.</li><li>• Staff groups, including class teachers, EP staff, SFLAs, Support for Learning teachers, Headteachers, and Senior Leadership Teams.</li><li>• Multi-agency partners and other teams including Educational Psychology, health professionals, social work and third-sector organisations.</li><li>• Community members and local organisations, including Parent Councils and individuals submitting written representations.</li><li>• Elected Members and other stakeholders who engaged through correspondence or attendance at public meetings.</li></ul> <p>This engagement captured the perspectives of groups with protected characteristics and of those experiencing socio-economic disadvantage.</p>	
<b>If NO engagement has been conducted, please state why.</b>		
<b>How was the engagement carried out?</b>	<b>What were the results from the engagement? Please list...</b>	



<b>Focus Group</b>	Yes	<p>Across the six parent/carer focus groups, families highlighted several consistent themes:</p> <ul style="list-style-type: none"> <li>• Safety and environment: Parents stressed that EP environments - quiet spaces, low sensory stimulation, predictable routines - are essential for their children's regulation, wellbeing and ability to learn. Many felt mainstream environments would be overwhelming or unsafe for their child.</li> <li>• Specialist staffing and relationships: Families placed strong value on the expertise, experience and relational security provided by EP staff. They expressed concern that this level of skilled support could not be replicated consistently across all primaries.</li> <li>• Transitions and change: Parents described transitions as extremely challenging for disabled and neurodivergent children. They were worried that any change of environment, staffing or structure could lead to anxiety, distress or regression.</li> <li>• Variation in school capacity: Families felt there were significant differences in space, staffing and readiness across schools. They questioned whether all schools could meet high levels of need equitably.</li> <li>• Communication and reassurance: Parents sought clearer information about the proposal, timelines and guarantees that no child would be moved. They emphasised the need for transparent, ongoing engagement.</li> <li>• Value of current EP provision: Some described EPs as having a significant positive impact on the life of families, noting significant progress in communication, regulation and confidence.</li> <li>• Impact on carers: Several parents highlighted the emotional and practical strain of caring for disabled children, and the risk that reduced school stability could affect family wellbeing.</li> </ul>
<b>Survey</b>	Yes	<p>A total of 1,194 responses were submitted on Participate+:</p> <ul style="list-style-type: none"> <li>533 parents/carers (mainstream)</li> <li>145 parents/carers (EP)</li> <li>273 teachers</li> <li>59 support staff</li> <li>29 senior leaders</li> <li>6 health professionals</li> <li>4 third-sector partners</li> <li>3 social work staff</li> <li>2 educational psychologists</li> <li>140 other respondents</li> </ul>

Across the submissions, respondents raised a clear set of recurring themes and concerns:

1. Concern about reduced support for children with ASN

Most respondents – particularly parents/carers of disabled or neurodivergent children – expressed concern that changes to the current model could lead to reduced specialist support, unmet need or increased dysregulation if mainstream schools were not fully equipped.

2. Staffing, capacity and training

A significant proportion raised worries about whether all 47 schools would have enough staff, the right training, or the environment required to support highly complex learners.

Teachers and support staff emphasised workload, confidence, and resource pressures.

3. Environment and sensory needs

Respondents highlighted that many children rely on quieter spaces, smaller environments and adapted rooms. There was concern that not all schools could offer these essential supports.

4. Transitions and stability

Concerns were frequently expressed about the impact of change on children who struggle with transitions, especially those already thriving in EPs. Respondents asked for clarity and reassurance that children would not be moved.

5. Communication and transparency

Multiple respondents noted a need for clearer information about what the proposal meant in practice, timelines, and how decisions would be made. Some felt they needed more detailed explanations to fully understand the implications.

6. Equity and fairness

While some respondents saw potential benefits in wider access to enhanced support, many questioned whether consistency across 47 schools was achievable and whether children with the highest needs might be disproportionately affected.

7. Perceived motivation for change

A number of respondents queried whether the proposal was driven by resourcing pressures rather than educational improvement. Others noted that if properly resourced, a more inclusive model could be positive.

		<p>8. Minority support for potential benefits</p> <p>A smaller proportion of respondents supported elements of the proposal, highlighting the possibility of earlier intervention, increased school-level provision, and fewer transitions, provided change was fully planned and funded.</p>
<b>Display / Exhibitions</b>	No	
<b>User Panels</b>	No	
<b>Public Event</b>	Yes	<p>Public consultation meetings held across localities (6 events) including in-person and 3 online sessions. Across all 9 public meetings, participants raised strong and consistent themes reflecting both emotional and practical concerns:</p> <ol style="list-style-type: none"> <li>1. Safety, regulation and environment Parents repeatedly highlighted that EP environments provide quiet, structured, low-stimulus spaces that many children rely on. There was concern that mainstream environments - larger classes, busy corridors, higher noise levels - could be overwhelming or unsafe for some children if the model changed.</li> <li>2. Staffing expertise and relational security Participants stressed the importance of EP staff who know their children well, understand neurodivergence and dysregulation, and can de-escalate effectively. Many felt that mainstream schools may not have sufficient expertise, staff continuity or time to offer this level of relational support.</li> <li>3. Transitions and impact of change Parents and carers expressed concern about children who have experienced trauma, previous placement breakdowns or unsuccessful mainstream experiences. They worried that any change - physical or organisational - could lead to regression, anxiety and distress.</li> <li>4. Variation across schools and equity concerns Meeting attendees questioned whether all schools have appropriate spaces, staffing, leadership confidence or training to support highly complex learners. They emphasised the risk of postcode-based inequity unless provision is consistent across the authority.</li> <li>5. Clarity, communication and trust</li> </ol> <p>A significant number of attendees sought clearer information on:</p>

- whether children would be moved,
  - what “enhanced support in all schools” would look like,
  - how staffing would be allocated,
  - what would happen to EP buildings, transport, and Stage 4/ERG processes.
- Some felt unclear about the rationale and asked for more transparent communication.

#### 6. Value and identity of current EPs

Families spoke positively and often emotionally about the progress their children have made in EPs - better regulation, improved attendance, stronger communication, increased confidence, and transformed family life.

There was concern that losing the EP identity could dilute a model that is working well for many.

#### 7. Staff and partner perspectives raised in meetings

Staff attending the meetings highlighted challenges around workload, training, limited breakout spaces, and the complexity of supporting dysregulation. Some noted opportunities for earlier intervention but felt this required significant investment and careful planning.

#### 8. Requests for reassurance and involvement

Participants consistently asked for:

- Reassurance that children would not be moved,
- Involvement in future planning,
- Individual transition support if changes were introduced.

<p><b>Other: please specify</b></p>	<p>50+ Pupil-voice sessions within EPs and mainstream settings using child-friendly communication approaches.</p> <p>Across all EP and primary settings, children shared clear and consistent messages:</p> <ul style="list-style-type: none"> <li>• Trusted adults: Pupils rely on familiar staff who help them feel safe, calm and understood.</li> <li>• Predictable routines: Children said they need clear structure and find unexpected changes difficult or upsetting.</li> <li>• Quiet, calm spaces: Many depend on quiet rooms, sensory areas and smaller groups to manage noise, stay regulated and focus.</li> <li>• Belonging: Some pupils value being with peers who understand them and find large, busy environments overwhelming.</li> <li>• Support with big feelings: Children noted that staff help them regulate, solve problems and feel more confident.</li> </ul> <p>Overall, pupil voice reflects a strong need for consistency, trusted relationships, predictable routines and quiet, adapted spaces.</p> <p>53 Written representations, including extensive parent/carers submissions and organisational responses (e.g., Airth Parent Council). Across parent, organisation and staff submissions, several consistent themes emerged:</p> <ul style="list-style-type: none"> <li>• Safety and environment: Strong concern that mainstream settings may not offer the quiet, adapted, low-sensory spaces children rely on in EPs.</li> <li>• Specialist staffing: Parents and staff emphasised the expertise of EP staff and questioned whether all schools could replicate this level of skilled support.</li> <li>• Transitions and emotional impact: Many were concerned that any change in environment, staffing or routine could cause distress, anxiety or regression for highly vulnerable children.</li> <li>• Equity and variation across schools: Respondents noted significant differences in school capacity, space, leadership confidence and staffing, raising concerns about consistency across the authority.</li> <li>• Value of EPs: A large number of parents described EPs as transformative for children's regulation, wellbeing, learning and family life, expressing concern that this could be undermined.</li> <li>• Clarity and communication: Written submissions frequently requested clearer information about what the proposal means in practice, whether children would move, and how staffing and support would be allocated.</li> <li>• Resource concerns: Some questioned whether financial pressures were influencing the proposal and stressed that any change must be needs-led.</li> </ul>
<p><b>Has the proposal / policy/ project been reviewed / changed as a result of the engagement?</b></p>	<p>Yes</p>

Have the results of the engagement been fed back to the consultees?	No
Is further engagement recommended?	Yes

## SECTION FIVE: ASSESSING THE IMPACT

**Equality Protected Characteristics:** What will the impact of implementing this proposal be on people who share characteristics protected by the Equality Act 2010 or are likely to be affected by the proposal / policy / project? This section allows you to consider other impacts, e.g. poverty, health inequalities, community justice, carers etc.

Protected Characteristic	Neutral Impact	Positive Impact	Negative Impact	Please provide evidence of the impact on this protected characteristic.
<b>Age</b>	✓			<p>The proposal primarily affects children of primary school age, particularly those with ASN.</p> <p>Younger children may benefit from earlier intervention, enhanced inclusion and stronger in-school supports.</p> <p>Some younger children may experience challenges if transitions are not carefully managed.</p> <p>Adults (parents/carers) of different ages were represented in the consultation; no age group is disproportionately disadvantaged.</p>
<b>Disability</b>			✓	<p>For children and young people with disabilities, neurodivergence or significant needs currently in EPs, the themes emphasise that continuity of relationships, predictable routines and access to quieter, adapted environments are central to their wellbeing, safety and ability to learn. A change in provision could therefore create heightened anxiety, increased dysregulation or difficulties with transition if not carefully and individually planned.</p> <p>Pupil voice, parent focus groups and written representations consistently highlight reliance on:</p> <ul style="list-style-type: none"> <li>- predictable routines</li> <li>- specialist staffing</li> <li>- quiet, adapted environments</li> <li>- relational security</li> </ul> <p>Risks include heightened anxiety, dysregulation or loss of progress due to transitions and if supports are not replicated effectively across all schools.</p>

**Public Sector Equality Duty: Scottish Public Authorities must have 'due regard' to the need to eliminate unlawful discrimination, advance quality of opportunity and foster good relations. Scottish specific duties include:**

				<p>Improving consistency of support across all schools may therefore benefit boys, who make up the majority of EP cohorts.</p> <p>No evidence of sex-based discrimination arising from the proposal.</p>
<b>Ethnicity</b>	✓			<p>Participation of minority ethnic families was low but present.</p> <p>There is little evidence that the proposal disadvantages specific ethnic groups.</p> <p>Communication accessibility and cultural considerations will remain important but do not present a disproportionate impact.</p>
<b>Religion / Belief / non-Belief</b>		✓		<p>Consultation data does not indicate that children or families of any particular faith or belief group would be disadvantaged by the proposal.</p> <p>Enhanced Provision and ASN supports are currently delivered consistently across both denominational and non-denominational schools. However, creating enhanced support within all schools would strengthen choice for families who wish their child to attend a faith school. At present, EP placements are allocated based on available space, which means children cannot always access an EP within a denominational setting even when this aligns with family preference. A universal model would therefore improve equity of access for families seeking faith-based education alongside the right level of support.</p>
<b>Sexual Orientation</b>	✓			<p>No direct link between the proposal and sexual orientation.</p> <p>No evidence of disproportionate impact.</p>
<b>Transgender</b>		✓		<p>While few respondents identified as transgender, ensuring support in all schools may improve inclusion, safety and relational security for trans and gender-diverse pupils requiring ASN support.</p> <p>No evidence of negative impact and children who identify as transgender may feel improvements in inclusion, safety and relational security due to this proposal.</p>



<b>Pregnancy / Maternity</b>	✓			Staff who are pregnant may be impacted by deployment or training planning but this can be managed through HR processes. However, this is no different to any educational setting.
<b>Marriage / Civil Partnership</b>	✓			No evidence of differential impact linked to marital or civil partnership status.
<b>Poverty</b>		✓		<p>Children from socio-economically disadvantaged backgrounds are overrepresented in ASN categories.</p> <p>Increasing support in all schools may improve equity of access, reduce reliance on transport, improve attendance and strengthen early intervention.</p> <p>Engagement included families experiencing financial pressure, and their concerns were considered.</p>
<b>Care Experienced</b>	✓			<p>By all schools being able to provide the right support, this could allow them to attend their local school within the community they are placed.</p> <p>Care-experienced children are more likely to require consistent relationships, predictable structures and enhanced support.</p> <p>Disruption to established staff and routines may disproportionately affect this group if they are within an EP.</p>
<b>Other, health, community justice, carers etc.</b>	✓			<p>Parents and carers - many of whom provide substantial levels of care - described the potential emotional, practical and financial impacts of change. Their feedback indicates that uncertainty or loss of established relationships may disproportionately affect families of disabled children, care-experienced people, or those managing multiple caring responsibilities.</p> <p>Any destabilisation of school support may place additional pressure on families.</p> <p>Conversely, improved consistency across schools may reduce long-term strain on carers.</p> <p>No evidence of disproportionate impact in relation to community justice or public health.</p>

<b>Risk (Identify other risks associated with this change)</b>	<p>Risk of insufficient environmental adaptation in some schools.</p> <p>Risk that staffing capacity varies, creating unequal experiences.</p>
	<b>Evidence of Due Regard</b>
<b>Eliminate Unlawful Discrimination (harassment, victimisation and other prohibited conduct):</b>	<p>The proposal sought to reduce discrimination by removing the 'postcode lottery' inherent in the current model, where access to support is often dictated by geography rather than individual need. By moving towards a devolved model, the authority aimed to ensure that disabled pupils are not disproportionately disadvantaged by lengthy application processes or the requirement to travel outside their local community to receive an education.</p> <p>To mitigate the risk of 'support dilution' raised during engagement, the implementation plan would include rigorous monitoring of resource allocation. This ensures that the protected characteristic of disability is the primary driver for support, protecting against indirect discrimination where a child might otherwise be excluded from local school activities due to a lack of immediate, on-site help.</p>
<b>Advance Equality of Opportunity:</b>	<p>The proposal advances equality by ensuring that every local school is equipped to support children with significant needs from the point of entry (P1). This creates a more equitable support by:</p> <ul style="list-style-type: none"> <li>• Improving Accessibility: ensuring that the same standard of "Enhanced Support" is available in every locality, not just in current, specific sites.</li> <li>• Consistent Intervention: by intervening at Stage 3 of the Staged Intervention framework within the local school, children with additional support needs can access tailored learning at the same time as their peers, reducing the attainment gap.</li> <li>• Removing Structural Barriers: reducing the need for placing requests and transitions between schools allows disabled pupils to maintain stable social and educational ties within their own communities, a benefit naturally afforded to peers without ASN or disability.</li> </ul>

<b>Foster Good Relations (promoting understanding and reducing prejudice):</b>	<p>A core ambition of the proposal is to dismantle the stigma sometimes associated with specialised provision by normalising the ability to support significant needs within the mainstream environment.</p> <ul style="list-style-type: none"><li>• Increasing Opportunities for Inclusion: by embedding enhanced support within every school, children with additional support needs have greater opportunity to be active members of their local school community. When enhanced support is a standard part of the catchment school offer, it enables children to learn, socialise and build relationships alongside their peers, strengthening their sense of belonging within their own community.</li><li>• Promoting Empathy and Understanding: mainstream pupils gain a greater lived understanding of disability and neurodiversity, fostering a culture of empathy and peer support from an early age.</li><li>• Partnership Working: while the engagement process highlighted significant concerns from the ASN community regarding trust, the authority is committed to a robust implementation phase. Continuous, transparent communication with parents and carers is essential to repair and strengthen these relationships, ensuring that inclusion is a shared goal between families and Education Services.</li></ul>
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## SECTION SIX: PARTNERS / OTHER STAKEHOLDERS

Which sectors are likely to have an interest in or be affected by the proposal / policy / project?		Describe the interest / affect.
<b>Business</b>	No	
<b>Councils</b>	Yes	<p>The proposal has relevance for Falkirk Council services beyond Education, including Children's Services, Transport, Property/Estates, and Governance.</p> <p>Other local authorities may have an interest due to shared learning around ASN redesign, equity, and resource models.</p>
<b>Education Sector</b>	Yes	<p>This is the sector most directly affected.</p> <p>Impacts include school leadership, teaching staff, Support for Learning Assistants, Enhanced Provision staff, educational psychologists, and support services.</p> <p>The proposal influences staffing, training, inclusion systems, staged intervention processes and the distribution of ASN resource across all schools.</p> <p>National bodies (e.g. Education Scotland, ADES) have an interest due to wider strategic implications.</p>
<b>Fire</b>	No	
<b>NHS</b>	Yes	<p>National Health Service (NHS) Forth Valley partners - particularly Child and Adolescent Mental Health Services (CAMHS), Community Paediatrics, Speech and Language Therapy (SALT), Occupational Therapy (OT) and nursing services - have a direct interest in the proposal due to the significant overlap between children's health needs and the educational support they require in school.</p> <p>The proposed model has implications for joint planning arrangements, Getting it Right for Every Child (GIRFEC) pathways, and the co-ordination of support for children and young people with significant needs.</p> <p>A more consistent, school-based approach to enhanced support may also strengthen multi-agency working, supporting earlier, more joined-up and more effective interventions for children and families.</p>

<b>Integration Joint Board</b>	Yes	<p>Relevant due to cross-cutting responsibilities around children's health, wellbeing, social care, and early intervention.</p> <p>The proposal interacts with wider strategies for vulnerable children, carers, and family support.</p>
<b>Police</b>	No	
<b>Third Sector</b>	Yes	<p>Organisations supporting children with ASN, disabilities, mental health needs, or family support (e.g. Autism charities, Carers' Centres, advocacy groups) have a clear interest.</p> <p>A more consistent model may enhance partnership working and improve clarity on referral pathways.</p>
<b>Other(s): please list and describe the nature of the relationship / impact.</b>	<p>Social Work, Parent Councils, and Community Organisations may be impacted also in the following ways:</p> <p>Social Work: Involved where children are care experienced, vulnerable, or require multi-agency support; stability of provision is significant for these groups.</p> <p>Parent Councils: Represent school communities; strong interest in equity, communication and the impact on local schools.</p> <p>Community Groups: Local networks and support organisations have an interest in accessibility and inclusion at community-school level.</p>	

## SECTION SEVEN: ACTION PLANNING

**Mitigating Actions:** If you have identified impacts on protected characteristic groups in Section 5 please summarise these in the table below detailing the actions you are taking to mitigate or support this impact. If you are not taking any action to support or mitigate the impact you should complete the No Mitigating Actions section below instead.

Identified Impact	To Who	Action(s)	Lead Officer	Evaluation and Review Date	Strategic Reference to Corporate Plan / Service Plan / Quality Outcomes
Risk of instability, anxiety or dysregulation due to change in environment, staff or routines and transitions	Disabled children; neurodivergent children; children with sensory/communication needs	<ul style="list-style-type: none"> <li>• Individual transition planning for every child currently in EP</li> <li>• Multi-agency GIRFEC meetings where required</li> <li>• No forced movement of children</li> <li>• Continuity of trusted adults wherever possible</li> <li>• Allocated resources follow the child if moved from EP to mainstream/catchment school.</li> </ul>	Headteachers/ASN co-ordinators  ASN Service	30/06/2026	ASN Review, Falkirk Directorate Plan and Education Services Plan
Inconsistent ability of schools to meet significant needs across the estate	Disabled pupils; sensory-sensitive pupils	<ul style="list-style-type: none"> <li>• Continued mapping of building suitability and identification of required adjustments</li> <li>• Prioritised environmental improvements (quiet spaces, breakout rooms, regulation spaces)</li> </ul>	Education and Place Services	30/06/2026	ASN Review, Accessibility Strategy and Learning Estate Review
Risk of increased pressure on carers if school support becomes less predictable	Parents/carers (many with caring responsibilities)	<ul style="list-style-type: none"> <li>• Assurance that children will not be moved</li> <li>• Ongoing direct communication with families</li> <li>• Carer-informed planning for phased implementation</li> </ul>	ASN Service/headteachers	30/06/2026	ASN Review, Falkirk Directorate Plan and Education Services Plan

Identified Impact	To Who	Action(s)	Lead Officer	Evaluation and Review Date	Strategic Reference to Corporate Plan / Service Plan / Quality Outcomes
Risk of loss of parental trust and positive relationships	Parents/carers (particularly parents of children currently within EPs)	<ul style="list-style-type: none"> <li>• Ongoing engagement</li> <li>• Reassurance that no current EP child will be moved placement and/or school</li> <li>• Improved communications with ASN parent forum</li> </ul>	ASN Service	30/06/2026	ASN Review, Falkirk Directorate Plan and Education Services Plan
Risk of staff confidence and capacity varying between schools	Teachers, SFLAs, school leadership	<ul style="list-style-type: none"> <li>• School based coaching model across all schools</li> <li>• Targeted CLPL on inclusion and behaviour support</li> <li>• Revised staged intervention and decision-making support</li> </ul>	ASN Service	30/06/2026	ASN Review, Falkirk Directorate Plan and Education Services Plan
Risk to equity if implementation varies across communities	Pupils across Falkirk, including those in deprived areas	<ul style="list-style-type: none"> <li>• Clear governance framework for delivering consistent support</li> <li>• Monitoring of school-level data on need, deployment and outcomes</li> </ul>	ASN Service	30/06/2026	ASN Review, Falkirk Directorate Plan and Education Services Plan

### No Mitigating Actions

Please explain why you do not need to take any action to mitigate or support the impact of your proposals.

Are actions being reported to Members?	Yes
If yes when and how ?	April 2026

## SECTION EIGHT: ASSESSMENT OUTCOME

Only one of following statements best matches your assessment of this proposal / policy / project. Please select one and provide your reasons.

No major change required	No	
The proposal has to be adjusted to reduce impact on protected characteristic groups	Yes	<p>The consultation process facilitated extensive engagement with children and young people, parents and carers, staff, partners and the wider community. Rather than uncovering unknown issues, the feedback served to validate existing professional evidence and provided a 'lived experience' lens through which to refine the proposed implementation. The responses provided detailed insights into:</p> <ul style="list-style-type: none"><li>• Systemic Strengths: reaffirming the high value placed on the expertise currently held within the service.</li><li>• Requirements for consistency: corroborating internal data regarding the need for a more uniform approach to Stage 3 support across all localities.</li><li>• Shared Aspirations: aligning the professional vision for inclusive practice with the community's desire for robust, localised support that eliminates the need for school moves.</li></ul> <p>This engagement has not changed the underlying rationale for the proposal - which remains grounded in long-standing data - but it has been instrumental in identifying the specific 'safeguards' and communication strategies required to ensure a successful transition for families.</p> <p>Consultation feedback, alongside wider local and national evidence, has reaffirmed existing professional understanding of the challenges involved in meeting the increasing demand for additional support needs across the authority. This has reinforced the necessity of a model that is equitable, sustainable, and capable of evolving alongside changing patterns of demand. While the underlying ambition to achieve greater equity is widely supported, however, the analysis of data suggests that there is greater confidence to be built before any changes could be made.</p> <p>The proposal was designed with a clear focus on the requirements of disabled children, neurodivergent learners, those with communication</p>



and sensory needs and care-experienced children. Professional evidence and existing practice have long established that these learners rely on predictable routines, consistent relationships and adapted environments.

To ensure stability and protect the wellbeing of these vulnerable groups, the proposal specifically avoids a 'one-size-fits-all' transition, which proposed to make changes while giving the option of maintaining current placements. This structure was intentionally chosen to prevent the risk of instability or anxiety, ensuring that any movement assessed/planned and that any transition into mainstream occurs only when the necessary strategies and environment are fully in place to support the learner's continued progress.

Education Services recognises that, without adjustment, the original proposal risked unintended negative impacts for these groups. As a result, modifications were required to reduce potential inequality and ensure that the Council continues to meet its duties under the Equality Act 2010.

In response to consultation findings and equality analysis, Education Services has chosen not to proceed with the proposal as originally drafted and has instead taken forward a different approach to achieving the same intended outcome. The proposal has therefore been adjusted in the following ways:

- All existing Enhanced Provisions will remain in place, and current arrangements governing access to these provisions will not change.
- Enhanced support will continue to be strengthened across all schools, building on existing strengths and complementing, rather than replacing, current provision.
- Any future changes will be phased and individually planned, with particular attention to vulnerable learners and those with protected characteristics.
- Workforce capacity and professional learning will be further developed

		<p>through a school-based coaching and modelling approach, supporting increased confidence, consistency and capability across schools.</p> <p>- Environmental adjustments continue to be identified and prioritised, recognising the importance of calm, predictable and sensory-aware learning spaces.</p> <p>These adjustments ensure that progress towards greater equity of enhanced support across the authority does not reduce or destabilise support for children with higher levels of need.</p> <p>With these changes in place, the proposal represents a continuation of improvement activity already underway, using available resources in a targeted and proportionate way to strengthen capacity, support sustainability and advance equality of opportunity for children and young people across Falkirk.</p>
<b>Continue with the proposal but it is not possible to remove all the risk to protected characteristic groups</b>	No	
<b>Stop the proposal as it is potentially in breach of equality legislation</b>	No	

## SECTION NINE: EPIA TASK GROUP ONLY

<b>OVERALL ASSESSMENT OF EPIA:</b>		<b>Has the EPIA demonstrated the use of data, appropriate engagement, identified mitigating actions as well as ownership and appropriate review of actions to confidently demonstrate compliance with the general and public sector equality duties?</b>	Yes
<b>ASSESSMENT FINDINGS</b>		Evidence and research has provided on the rationale of the proposal. Extensive engagement and consultations with stakeholders, and their demographic breakdown (where possible) has been provided, including the perspectives of the young people who would be directly affected. Lived experiences have been captured and analysed in relation to the proposal. Data of respondents has been provided, however there is a note on the limited disaggregated data of Enhanced Provision pupils. Mitigating actions take into account feedback from consultation responses. The assessment demonstrates compliance with the Public Sector Equality Duty.	
<b>If YES, use this box to highlight evidence in support of the assessment of the EPIA</b>  <b>If NO, use this box to highlight actions needed to improve the EPIA</b>			
<b>Where adverse impact on diverse communities has been identified and it is intended to continue with the proposal / policy / project, has justification for continuing <u>without making changes</u> been made?</b>		Yes / No	If YES, please describe:

LEVEL OF IMPACT: The EPIA Task Group has agreed the following level of impact on the protected characteristic groups highlighted within the EPIA		
LEVEL	COMMENTS	
HIGH	No	
MEDIUM	Yes	<p>There is no breach of Council policy or legal duties.</p> <p>There is a notable interest from the public and regional media on the outcomes of the consultation, which will impact on the Council's reputation.</p> <p>The assessment has concluded that the original proposal requires adjustments, taking into account the feedback from stakeholders. Therefore there is no harm to people and communities.</p> <p>The number of people impacted go beyond the pupils of Enhanced Provision, which include families, staff, public and third sector organisations. This would equate to significant proportion of people affected.</p>
LOW	No	

## SECTION TEN: CHIEF OFFICER SIGN OFF

<b>Director / Head of Service:</b>			
<b>Signature:</b>	Jon Reid	<b>Date:</b>	06/02/2026