



Department
for Education

Norfolk County Council Special Free School

**Contextual information for
applicant groups applying to
open a new Special Free School**

Norfolk County Council

July 2023

OVERVIEW

The Department for Education is inviting applications from proposer groups to open a new special free school in Downham Market, West Norfolk.

Applicant groups can access the key school specification information, along with the full 'How to Apply' guidance. You should read these documents carefully before completing mandatory pre-registration.

The school specification document sets out the key factual details about the proposed school, including the proposed size, SEND designation, age range, suggested top-up funding, and proposed site.

This document provides applicant groups with additional contextual information provided by Norfolk County Council which includes:

- The rationale, context and need for the school;
- Details on the commissioning of places, including the involvement of any other LAs commissioning places;
- A brief description of the existing provision in the area;
- Future expected growth in pupil numbers; and
- How the LA expects places within the school to be filled.

RATIONALE, CONTEXT AND NEED FOR THE SCHOOL, INCLUDING PROPOSED COMMISSIONING ARRANGEMENTS

The opening of a new special free school for children with Communication and Interaction needs (including ASD) in Downham Market is a critical element of Norfolk's broader plans to transform local provision for children and young people with SEND as part of Norfolk's "Local First Inclusion" strategy. A link to an overview of Local First Inclusion, as well as Norfolk's wider Learning Strategy is included in the accompanying specification document.

Local First Inclusion, with associated investment from the Department for Education under its Safety Valve agreement, provides a unique opportunity to re-shape Norfolk's landscape of provision, prioritising a direction of travel which will see:

- Children's needs met locally
- Children's needs met earlier
- Children's needs met more holistically

Following a comprehensive sufficiency analysis conducted in 2018, NCC identified a range of gaps in local specialist provision, as well as additional challenges regarding capacity of mainstream schools to support children local to their communities. In response, NCC invested £120m into the development of new capital ventures to address its shortfall in both unit and state funded special school provision; accompanying a broader SEND and Alternative Provision Transformation Programme centred upon increasing capacity within the mainstream sector to support more complex children.

The aims of this programme have been to reduce reliance on high-cost independent sector provision, within the context of Norfolk as an outlier in respect of % of children with EHCPs placed within independent schools, (i.e., the overall % of Norfolk C&YP within special (state-funded + independent) at 47% is comparable to national, however, Norfolk's ratio of independent placements within this overall cohort is substantially higher).

As a result of this investment to date, three new special schools and ten new specialist resource bases within mainstream schools have opened. This new school in Downham Market complements a substantial wider strategy where provision within mainstream schools is the cornerstone. However, given the increasing identification and prevalence of Social, Communication and Interaction needs, including formal diagnosis of ASD, Norfolk will continue to remain reliant on the more costly independent sector or needing to transport children significant distance from their local communities to attend a school which meets their needs at considerable unnecessary cost, if left unaddressed.

The over-reliance on high-cost independent sector provision is overwhelmingly the main reason behind Norfolk's historic and current High Needs Block deficit. Our Local First Inclusion strategy is underpinned by a plan to reduce independent sector places from just over 900 currently to just over 100 in 6 years' time. This new special school, within our current sufficiency strategy must be delivered to enable our strategic plans to be successful.

Following the creation of new provisions over this period, the sufficiency analysis was refreshed in 2021 to determine impact and current gaps and needs. The analysis identified an ongoing reliance on independent sector provision, reflecting the large upturn in demand for specialist provision arising from the 2014 SEND reforms and the emphasis on parental right and entitlement to the school of their choice. As new provisions had only just opened, and with an emerging transformative strategy surrounding Alternative Provision and specialist SEMH provision, the sufficiency analysis determined it was too early to reach conclusions on the full impact of the new provision on the overall landscape. However, it did identify specific new gaps for provision for children with Communication and Interaction needs, including ASD.

Local data identifies that the numbers of children with EHCPs with a primary need of ASD has increased by 91% between 2018-2022. This reflects the advances and improvements made in identification of SEND and the explosion of ASD diagnosis within the NHS across England. Evidence reflects that Social Communication and Interaction needs can often be "mis-diagnosed" as Social, Emotional and mental health needs as children's unmet needs result in challenging behaviour. Consequently, the development of a 3rd "high functioning" ASD school in Norfolk is

central to the overall strategic plan by meeting the needs of this cohort earlier, preventing escalation of challenging behaviour resulting in children entering SEMH provisions at a later stage of development.

The school will cater for pupils with broadly average cognitive abilities, but whose ASD (although diagnosis will not be a precondition of admission) presents a significant barrier to learning in a mainstream environment due to significant difficulties with sensory processing, social understanding and communication requiring highly specialist intervention and support.

Data within the Norfolk SV DSG management plan demonstrates that the numbers of children with EHCPs in independent provision with a primary need of ASD has increased by 52% between 2018 and 2021 with this forecasted to grow further without an available state funded offer. Mitigated figures demonstrate the plan for this cohort to reduce substantially by 2028 with a corresponding increase in unit provision and state special schools. A new ASD free school is central to the delivery of this plan.

The school will have 100 places at full capacity across the 5-18 age range, with double capacity in the secondary phase to ensure transition places for existing children as well as extra capacity to admit children year 7 upwards who are not able to access a secondary curriculum nor have their needs met within the environment of a large secondary school. It will also enable the LA to meet its stated ambition of “Local First” by offering a state funded school place for children in the West of Norfolk, reducing both the time and cost associated with transporting children to aligned schools in Fakenham and Norwich.

The school will be the third of its type in Norfolk, joining The Wherry and Duke of Lancaster Schools within a fraternity of 16 state funded special schools. The school will complement the existing provision by meeting the identified short fall of places, which increases pressure for places at existing schools in Fakenham and Norwich. It will also complement a large-scale increase of ASD unit provision across the county and in the local area, which will enable the LA to better plan strategically for local placements rather than being reliant only on when and where places become available

- a driving factor for entry into the independent sector, particularly when children are in crisis and placements are needed urgently.

Places at the school will be commissioned by Norfolk County Council and the new school is accounted for within the overall pupil profile trajectory of HNB allocations set out within the Dedicated Schools Grant recovery plan with the DfE. The pupil profiling also demonstrates the forecasted impact of this school upon the area, with greater proportions of children attending mainstream, unit or state funded provision and a substantial reduction in those attending independent settings.

Norfolk DSG Recovery Movement in Placements

Unmitigated placements:

Placement numbers by type	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29
Maintained/Academy/Free Special Schools	2,049	2,148	2,244	2,325	2,335	2,335	2,335
Independent Special Schools	909	959	1,009	1,059	1,109	1,159	1,209
Add/Other Provisions	205	245	285	325	365	405	445
Medical Needs/Hospital Provision	84	20	20	20	20	20	20
Personal Budgets	82	87	92	97	102	107	112
Section 19 Placements and Support^	157	157	157	157	157	157	157
Alternative Provision	110	114	114	114	114	114	114
Post-16 (Further Education)	764	786	810	834	859	885	911
Specialist Resource Bases & Deaf Resource Bases	420	467	528	574	592	592	592
Short Stay Schools	432	432	432	432	432	432	432
Other Local Authority Recoupment	96	105	114	123	132	141	150
Total Placement Numbers	5,308	5,520	5,805	6,060	6,217	6,347	6,477
Mainstream EHCP & funded SEN support	4,154	4,327	4,434	4,496	4,522	4,502	4,474
Total	9,462	9,847	10,239	10,556	10,739	10,849	10,951

Mitigated placements:

Placement numbers by type	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29
Maintained/Academy/Free Special Schools	2,049	2,128	2,188	2,233	2,317	2,347	2,369
Independent Special Schools	909	946	820	599	344	119	108
Add/Other Provisions	205	187	170	153	136	119	100
Medical Needs/Hospital Provision	84	20	20	20	20	20	20
Personal Budgets	82	83	84	85	86	87	86
Section 19 Placements and Support^	157	139	122	105	88	71	52
Alternative Provision	110	110	103	96	89	82	76
Post-16 (Further Education)	764	781	796	712	629	546	464
Specialist Resource Bases & Deaf Resource Bases	420	530	717	970	1,132	1,132	1,132
Short Stay Schools	432	432	432	432	432	432	432
Other Local Authority Recoupment	96	94	83	72	61	50	40
Total Placement Numbers	5,308	5,450	5,535	5,477	5,334	5,006	4,879
Mainstream EHCP & funded SEN support	4,154	4,330	4,385	4,445	4,496	4,562	4,693
Total	9,462	9,780	9,920	9,922	9,830	9,568	9,572

NCC has a track-record of co-production commissioning with the Norfolk Association of Special Schools (NASSH) to support mainstream inclusion; NASSH leaders act as specialist partners for our Specialist Resource Base mainstream unit model and through an outreach offer known as 'S2S'. The structure of these services, funded by both a small charge to mainstream schools and a c. £199,000 annual contribution from the High Needs Block and Early Years funding, drawing on the range of expertise from the full special school estate, means that the schools can deliver outreach that considers and meets individual pupil need, whole school leadership, management and training needs as well as catering for the geographical spread of the circa 450 mainstream schools in Norfolk. This school would support mainstream schools in its geographical catchment in partnership with its NASSH fraternity.

Our ambition for the new school is that it will enable another Good/Outstanding special school to be developed in Norfolk meeting current and future need of children and young people with SEND whilst also, explicitly, contributing to our HNB recovery plan within our final safety valve submission.

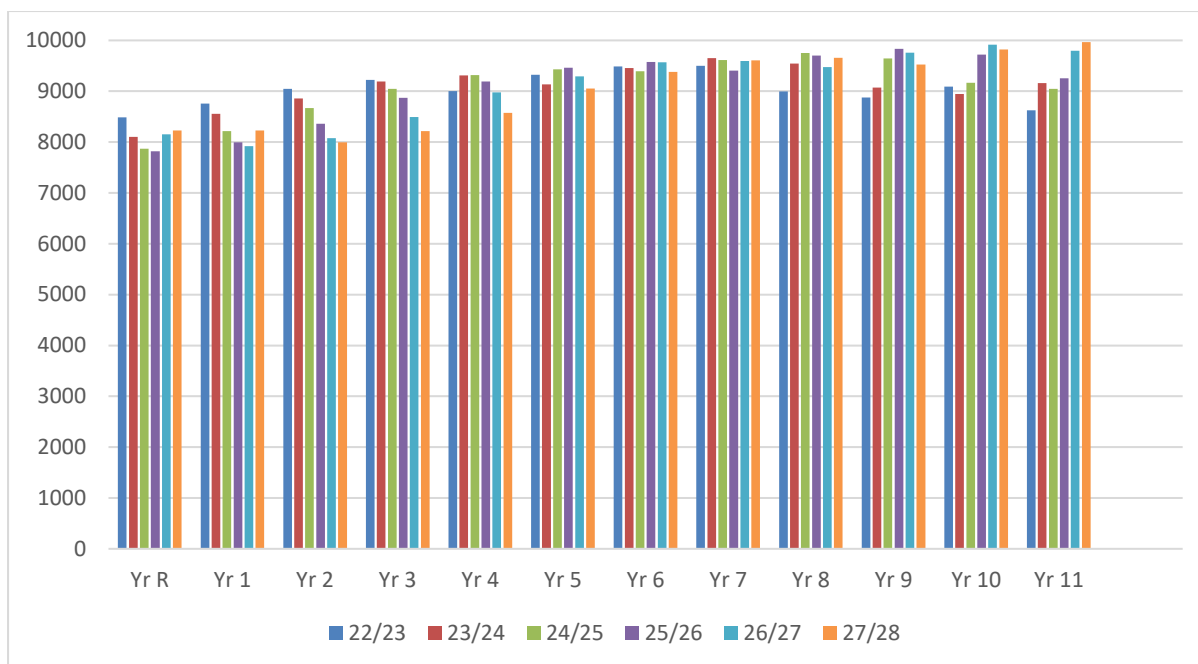
EXISTING PROVISION, EXPECTED FUTURE GROWTH IN PUPIL NUMBERS, AND HOW PLACES IN THE NEW SCHOOL WILL BE FILLED

Norfolk's SEND landscape reflects a graduated approach comprising:

- SEND provision available across its 650+ mainstream schools, colleges and early years providers supported by additional facilities, resources and funding from the LA;
- Units / Resourced provisions across 32 primary and secondary mainstream schools, across 5 categories of need (ASD, MLD, HI, SLCN, SEMH)
- 16 state funded special schools – 11 of which (including this new school once open) support a primary need of learning disability (with a range of co-morbid secondary needs such as PD, ASD, SLCN, SEMH, HI/VI/MSI, PMLD etc); 3 for a primary need of SEMH (with 2 schools being residential); and 2 for a primary need of ASD where pupils have generally average cognitive ability.
- Two Alternative Provision Academies, (comprising centres dispersed across the county), delivering education to pupils who have been permanently excluded or who without it would not receive suitable, full-time education.

In addition to the above, Norfolk has 15 independent schools and 1 independent post 16 specialist provider within its borders and a number in neighbouring local authorities where children are regularly placed; historically/currently these placements have been due to a lack of state-funded special school capacity.

Norfolk's overall school age population is expected to increase marginally by 0.24% between 2021 and 2028. However, when those totals are broken down by age range, the picture becomes more nuanced with a reduction of children in the lower age ranges, an evening in the mid age ranges and a larger % increase in the upper age ranges (which will transpose into post 16).



When applying the pupil cohort to those with EHCPs, initial trajectory data based on analysis of historical trends indicated the following:

- Norfolk’s EHCP population would be projected to grow to 11,432 by 2027 and 13,033 by 2032. Population grows through the entire period of the projection but slowing from 11.9% year on year in 2022 to 1.8% by 2032;
- Numbers of children with a primary need of ASD and SEMH would increase significantly until 2032, followed by SLCN and MLD;
- Norfolk’s population of EHCP children in post 16 FE settings would increase dramatically to approximately 4,300 by 2032;
- Numbers in mainstream schools would increase to around 2600 in 2026 before levelling out and slightly reducing to 2032;
- Numbers in state funded special would increase markedly between 2020-2024 before levelling out at the 2500 range;
- Numbers in independent settings would grow to just under 1000 in 2027 before levelling out.

This analysis, being based on population data and historical patterns, sets out the expected picture of demand in the EHCP system without any shift in the strategic direction of SEND. Norfolk’s “Local First Inclusion” strategy sets out a significantly different picture of placements of children and young people, with the plan focussed on a substantial reduction of children and young people in the independent sector.

Additionally, a substantial analysis of demand for special school provision based on requests for such arising from parental preference or where mainstream schools confirm they were not able to meet children's needs within Annual Reviews, was undertaken looking at the academic years 2018-19 to 2021-22. This revealed that:

- Requests for special school places had risen by 33% over the period
- For the children referred in a given academic year, the LA was only able to secure placements in on average 70% of the cohort referred.
- This resulted in an increasing number of children needing a special school place that the LA was unable to provide.
- Unmet need for places within the county were in the main population areas of Norwich, Kings Lynn and Thetford with a significant volume in Great Yarmouth.
- The waiting list cohort for ASD schools had grown from 57 in 2018 to 95 in 2021, a 67% increase.
- Children attending existing schools – The Wherry and Duke of Lancaster were travelling from hugely dispersed areas across Norfolk;
- 10% of the waiting list cohort were currently within Alternative Provision having been excluded from their school.
- Most children on the waiting list were in mainstream primary schools (70%).
- The analysis also identified a large cohort of children with a primary need of ASD were receiving their education in high-cost independent sector placements, as reflected in the Norfolk SV DSG Management plan. The independent sector had grown, with 2 new schools being created in that period in response to growth in the market. Costs in the ASD sector was rising at significantly over-inflationary rates year on year.
- However, there remained insufficient secondary mainstream ASD unit places against the numbers in the primary phase and this cohort were found being referred for special school provision in Year 6.

The analysis reached the following conclusions in respect of additional capital development:

- The LA should realise the ambitions of the 2018 strategy to increase the numbers of secondary mainstream ASD unit provision, particularly in the East and West of the County.

- A third ASD school be created at a strategic location logical to the 2 other high functioning ASD schools to further reduce the increasing numbers of children being identified as requiring specialist provision and entering the independent sector.
- Tribunals for ASD provision had increased and were double the numbers lodged in 2017.

It is expected therefore that this new school in Downham Market will be fully commissioned to its maximum capacity with a combination of pupils who:

- Are resident in the local community who would need to travel further afield to access a special school that is suitable to their SEND;
- Those who would otherwise enter the independent sector, including at such significant distance it would require them to board at the school further dislocating them from their local communities
- Those living in the local community who may return from settings further afield including those in out of county provisions
- Those in Alternative Provision which is not suitable for their needs, including those in receipt of Education other than at School packages
- Children arriving newly to the local area who either had or required a special school place in their previous area.

Norfolk County Council will work with the successful Academy Trust in the arrangements for admissions of pupils which will be planned during the growth phase in response to the relative demand at the time. The specified numbers of children detailed in each Key stage for placements may therefore be subject to alteration and will reflect the children's age ranges on opening of the school and during the growth phase. All admissions will be made in accordance with the duties placed on local authorities for naming schools in EHCPs under Section 39 Children and Families Act and associated regulations and statutory guidance.

The Local Authority will also work with the successful Academy Sponsor where the needs of pupils require adjustments and differentiation to the school's core offer or

approach, again based on the relative demand in the system and the presenting needs of children to whom the Local Authority owes duties to arrange the special educational provision set out in their EHCP.