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Dear Member

**CHILDREN AND YOUNG PEOPLE'S OVERVIEW AND SCRUTINY SUB-BOARD -  
MONDAY, 2 JUNE 2025**

I am now able to enclose, for consideration at the Monday, 2 June 2025 meeting of the Children and Young People's Overview and Scrutiny Sub-Board, the following reports that were unavailable when the agenda was printed.

<b>Agenda No</b>	<b>Item</b>	<b>Page</b>
<b>4.</b>	<b>Service Changes at the St Margarets and Spires Hearing Impairment Units Spires Statement</b>	(Pages 3 - 6)

Yours sincerely

Governance Support  
Clerk

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## Closure of the Enhanced Resource Base for Hearing Impairment at The Spires College

### Current provision

Historically there have been provisions for deaf children for 50 years at St. Margaret's and The Spires College (previously Westlands School). There are 8 places for pupils with hearing loss at each setting. The entry requirement for a place in the provisions is a bilateral severe or profound hearing loss, or a moderate hearing loss with additional needs. All children currently in the provisions have an EHCP. Numbers of children attending the provision at The Spires College have fluctuated over the years [REDACTED]. In addition to the high needs provision children, there are additional children with hearing aids, without EHCPs but with varying levels of hearing needs, that attend the College, drawn by the expertise of staff and deaf-friendly teaching. [REDACTED]

Currently in the Enhanced Provision the staffing consists of permanent specialist teaching assistants and a teacher of the deaf (TOD), as well as a fixed term deaf inclusion worker (DIW) appointed to support a specific child through his EHCP. [REDACTED]

### Benefits of this model

Torbay is geographically small and as such, high needs deaf children [REDACTED]

[REDACTED]. The importance of accessing a deaf community should not be underestimated. A deaf community, for example, allows for the successful development of a deaf identity, access to deaf culture and provides peer models that share strategies on successful navigation of the hearing world. Our Enhanced Resource Provision allows deaf children to form friendships with both hearing and deaf peers, something that is valuable in later life and is fairly unique to a school like ours.

The current Enhanced Provisions are good value for money. [REDACTED]

[REDACTED] The base funding allocated for each place has not increased in many, many years, [REDACTED]

Having a recognised base in Torbay is also great for parents. Having to consult with several schools for a place, not to mention the likelihood of schools stating they cannot meet their child's needs, will cause a great deal of uncertainty for both the parents and the students themselves. Having specialised staff in one place gives consistency for transition and supports parents in understanding the provision available for their child as staff can build relationships with the family across both phases of education.

The current Enhanced Provisions maintain skilled teams of professionals [REDACTED]. Recruitment of staff specialised in working with deaf children, British Sign Language (BSL) and Cued Speech is difficult.

[REDACTED]

The importance of specialised staff cannot be overestimated. Deaf children are almost always language deprived in their early years and this affects their language fluency, delays development of executive functions (higher-level cognitive functioning that controls lower-level activities such as attention and memory), and delays social skills and theory of mind. Deaf children have different memory capabilities - they have strengths in some aspects of remembering complex visual figures and spatial information but have difficulties in tasks requiring sequential memory and relational processing. Only skilled professionals can address these issues in a way that is not papering over the cracks.

Our provision also provides a physical space for deaf children at the College. Not only is this a physical space where deaf children can meet and benefit from identity creation and deaf cultural acquisition, it is also a refuge. Hearing aid and cochlear implant users employ a lot of listening effort during the school day. Breaks are important so that listening effort does not spill over into stress.

Physical space, then, is important for bringing that critical mass of deaf children together to share deaf culture and develop identity as well as a safeguard from stress. It is also a space to share deaf culture, such as BSL, with the hearing students in the school - in other words a space to offer opportunities for reducing marginalisation of the deaf and increasing understanding and awareness of cultural differences that exist in our larger community. This sharing of cultural diversity is helped when the space 'belongs' to the deaf children - it is not another 'hearing' space.

[REDACTED]

### **Proposed changes**

On 15 July 2024, I was informed by the Head of SEND for Torbay that the College's HI ERP would close in a year's time. I was told the decision had been made and would not change. I was asked to attend a meeting on 18 September 2024 to plan the communication of this to stakeholders. The local authority proposed that affected staff and parents of the children in the provisions would all be told on the same day, via letter written by the local authority. The Head of St Margaret's and I stressed the importance of telling staff

first and of telling parents face-to-face, not via letter. We therefore managed this process ourselves.

There was no consultation – I was informed (in July 2024) that the decision had been made and was told there was no room for discussion regarding alternatives. Parents and staff were not consulted. I was told to inform them that the decision had been taken. I can see no record of any genuine alternatives being considered.

As the decision has become more contentious, more varied reasons have been cited for it. Initially, it was claimed that both provisions had been at less than 50% capacity for several years. [REDACTED]

[REDACTED] A further argument we have been given is that there are absolutely no deaf children coming through the education system in future years so the places will be defunct. [REDACTED]

[REDACTED] Whilst we are told that the Joint Strategic Needs Assessment shows there is no future demand, I have not actually seen (or been shown) this data. The local authority state that the provision for the children currently in our provision will not change. Even if this is the case, this ignores the fact that those children currently in primary school and younger will be denied the opportunity to access such provision when they reach secondary age as there will be no specialist places to apply for.

The real reason for the change is to 'free up' specialist places because the local authority has several children with SEMH needs whom they cannot place. [REDACTED]

[REDACTED] However, this decision is not based on an accurate consideration of our hearing-impaired students. It downplays their needs because when a hearing-impaired child's needs are not met, they are far less likely to cause a fuss: they won't misbehave, they won't disrupt others or get excluded. And therefore, they won't cause a problem for the local authority. However, their needs are just as important as those of the unplaced children with SEMH needs, they are just less visible, and this lack of visibility places our hearing-impaired children at real risk. Deaf children are more vulnerable to mental health issues (some studies show they 4 times more likely to have mental health issues than their hearing peers) and lower quality of life caused by developmental delays associated with early communication deprivation. Because deafness is often an invisible disability, these issues are not often recognised. We must also remember there is a statutory requirement for support for disabled children. What is frustrating is that, through genuine consultation and by using the expertise of the school leaders who run these provisions, a genuine alternative could have been found that met the needs of both groups of children.

The local authority state that we can maintain support for our hearing-impaired children without an Enhanced Resource Provision as we can fund the support via the EHCPs. Having the financial certainty to be able to employ our own TOD is important. Having the specialised staff in one place gives consistency for the students; staff are on hand whenever they are needed by the student, rather than a one-hour appointment every other day. This especially benefits the students during non-structured times (e.g. break, lunch) which can often be challenging for hearing impaired students.

If funding is only provided through EHCPs then staffing will need to vary according to the needs of the children currently in the setting. [REDACTED]

[REDACTED] If all staff are to be funded through EHCP then employment contracts will need to change for the current staff and the school may need to pay redundancy. Staff may choose not to re-apply for temporary/variable contracts. Once the children currently in the provision leave, there will not be places available here for younger hearing-impaired children to apply for. Therefore, the support will die out and staff will have to leave. All in-school expertise will then be lost.

[REDACTED] The numbers of children with hearing impairment in Torbay mean that the critical mass of deaf children can only sustain one community each for high needs deaf children at primary and secondary age. Thus, the delivery of support for deaf children in general needs to be through a central service [REDACTED]. To suggest otherwise disregards the importance of a deaf community.

[REDACTED]

Thank you for your time.

Alex Newton  
Principal  
The Spires College