

May 2025

Factual response in regards to: Children and Young People's Overview and Scrutiny Board meeting - Service Changes at the St Margaret's and Spires Hearing Units

I joined St Margarets Academy on 22nd April 2025 as Headteacher following the retirement of Mr Tim Hughes. My report is based on the handover information I received from Tim in addition to professional dialogue with colleagues over recent weeks. My focus is primarily set on ensuring that all children within St Margaret's have their needs met, that they are safe and are in a secure position for secondary education when they leave in Year 6.

Context

There are 8 places available for pupils aged 4-11 years old with hearing loss / hearing impairment. The eligibility criteria for a place in the ERP provision is a bilateral severe or profound hearing loss, or moderate HI with other additional needs. Therefore, you can clearly see that the placement requirements are not ones of a young person that could have their needs met in a mainstream setting without a specialist provision to access daily and specialist staff on hand to support as required.

At present on roll at St Margarets we have:

- 5 pupils with an EHCP that receive support via staff at the Hearing Support Centre (HSC) via the ERP model. These five pupils will still be on roll at St. Margarets 2025-2026 academic year.
- 2 pupils without an EHCP but on pathway to application. These pupils are covered naturally by specialist staff in HSC, but will need a formal identification to receive consistent support in the future.
- 11 pupils on SEN K register for hearing impairments, who are supported by the Advisory Service and rely on the expertise of staff, our deaf-friendly approach and the adaptive teaching we have in place.
- From September 2025 we have confirmation of 3 additional hearing-impaired children that will be attending St Margarets who are receiving support from the Advisory Service until EHCP's are confirmed. From the information already received we can confidently state that at least two of these pupils would meet the requirements for the specialist places at the ERP via the HSC at St Margaret's.

Current staffing at St Margaret's stands at three specialist Teaching Assistants for HI pupils, three Deaf Inclusion Workers that support pupils with BSL communication and a Teacher of the Deaf supporting three days a week as outlined in pupils EHCP requirements.

HSC Staff:

Staff A	Teacher of the Deaf (M-W)
Staff B	BSL L6 - Deaf Inclusion Worker (DIW) M-Th
Staff C	BSL L3 - Deaf Inclusion Worker (DIW) Th-Fr
Staff D	BSL L3 - Specialist TA Th-Fr
Staff E	BSL L3 – FT - 4 days as Deaf Inclusion Worker, 1 day Specialist TA
Staff F	BSL L2 – FT - Specialist TA

Statutory Service

I am very aware that the advisory caseload has increased year on year and the current team are struggling to meet the needs of those pupils and young people requiring specialist support. I understand that business cases have been proposed in the last 18-months but I am unaware of an outcome to address this. Thankfully we have skillful and dedicated staff that are able to support with the demands, however with a reduction in funding to support the HSC this puts further strain and impacts significantly on the longer-term provision to support HI pupils.

The advisory team are small but respond quickly and efficiently to any new referrals both within and outside of term time. Specialised staff are invaluable and their expertise essential in assessing and meeting the needs of HI pupils. Since joining St Margaret's I have quickly learnt how deafness can affect a young person not just in communicating, but in how new information is processed, learnt and memorised and how only trained professionals, through working with a young person, can design a bespoke and beneficial support plan that works for them.

Community Impact

St Margarets has supported HI pupils and their families for over 60 years since it opened in 1964. The HSC and St Margaret collaboration, inclusive approach and expertise has enabled an extensive number of pupils to have their needs met, make progress in their education and be secondary school ready. By removing this valuable resource, we are changing the school identity and impacting on its offer to the community it serves.

Hearing-impaired children need a community and St Margarets has been able to offer an enhanced resource provision with eight available places.

I was informed, prior to starting at St Margarets, that without any consultation, the Local Authority directed Senior Leaders in July 2024 that it will close from September 2025. This decision was also to impact on a secondary provision at The Spires College that has also been directed to close at the same time.

I am aware that the school community, parents, staff, pupils and the PTA (Parent, Teacher Association) were extremely active leading a campaign to revert this decision to close the provisions. This closure has impacted significantly on the school community and ignited a

passion to fight for the decision to be delayed until satisfactory consultation is conducted by the Local Authority.

Consultation Concerns

I am very aware that multiple sources have expressed an alarming concern that statutory consultation was not conducted. I understand that this has been shared with you in various meetings, written accounts, letters, and petitions.

My understanding is that the statutory process for proposals to change or close resource provisions for deaf children involves extensive consultation and a focus on ensuring the best possible educational outcomes for children. Any changes must be justified by improvements in the standard, quality, or range of educational provision, and the local authority must consider the impact on children and their families, especially those most directly affected.

Consultation and Involvement:

- **Local Authority Responsibility:**

The local authority is responsible for conducting the EHC needs assessment and securing the specified provision for children with SEN, according to the Children and Families Act 2014.

- **Parental Involvement:**

Parents of deaf children must be fully consulted on any proposed changes to their child's EHC plan and be aware of their right to appeal to the Tribunal.

- **"Greatest Weight" to Affected Parties:**

The local authority should give the "greatest weight" to those most affected by proposals, especially parents at affected schools, [according to the guidance from the National Deaf Children's Society](#).

- **Opportunity to Give Views:**

Parents should have sufficient opportunity to give their views on proposals.

I have been informed that this statutory consultation was not conducted and parents of pupils with an EHCP received a letter hand delivered and opened at school to share the news of the closure without the consultation process above.

Detrimental Impact

A number of parents were significantly worried about the impact of disruption to their children's routines and the detrimental effect of potentially having to take children out of learning environments where they were comfortable. Potentially a deaf child or HI child with no identifiable community would feel very isolated and this could have a significant negative impact on their mental health and long-term progress and success.

This will materially change the identity of the school and its inclusive offer to its community with no collaboration or consultation to look at alternative approaches to help address LA SEN and funding needs and current HI provision and demand.

The HSC is more than a learning base, it is a place of safety and security. Pupils use the HSC as a healthy start to the day to enable their hearing aids and equipment to be checked, offer a place to embrace their deaf culture, come together whilst supporting SEMH and

networking with others that have a similar understanding and awareness within our wider community.

If funding to schools is now to be based on a pupil's EHCP then Torbay will lose highly trained, specialist staff due to contracts varying year on year removing consistency and specialism for our community which will ultimately negatively impact the service that Torbay can offer to our community. From what I have read, longer term, this will actually have the opposite effect to what is being sought through the closure of the centres, as the overall cost to the council will be higher due to needing to outsource the provision to other areas and facilities.

A holistic and balanced view

It is clear that since joining the school in April with no prior knowledge or emotional connection to the HSC, I can understand and appreciate the difficult decision that Torbay Local Authority had to make to release specialist places to support pupils with SEMH and also contend with the safety valve agreement. However, this swift decision was not made with appropriate statutory consultation and with accurate consideration of the current and future needs of hearing-impaired pupils. I fully agree with both my predecessor Tim Hughes and The Spires College, that if clarity in the consultation with stakeholders was conducted in collaboration with senior school leaders, appropriate alternatives could have been reached and unnecessary frustration and upset for the families we serve could have been avoided.

Kind regards,



Mrs Nikki O'Dwyer
Headteacher
St Margaret's Academy.