

Annex 1

<b>EIA Title</b>	Pupil Referral Unit (PRU) Capital Strategy			
<b>Did you use the EIA Screening Tool?</b> (Please tick or specify)	Yes (Please attach upon submission)	X	No	

## 1. Explaining the matter being assessed

<b>What policy, function or service change are you assessing?</b>	<i>In order to achieve a holistic strategy for alternative provision of education that meets the needs of some of our most vulnerable children and young people, our goal is to transform the way in which Pupil Referral Units (PRU) are used to create a more positive impact for those accessing them. This will be achieved by implementing a new delivery model which would deliver efficient utilisation of resources, benefit from economies of scale, where appropriate, and put emphasis on prevention and intervention rather than exclusion. To support this the proposal is to replace the dilapidated and inappropriate estate with new, fit for purpose PRUs.</i>			
<b>Why does this EIA need to be completed?</b>	<i>A significant proportion of pupils placed in Alternative Provision (AP), including PRUs require either Special Educational Needs and Disability (SEND) support or have/are awaiting an Education, Health and Care Plan (EHCP). PRU provision within Surrey is available for all pupils of statutory school age. Changes to the emphasis of PRU provision are likely to impact the characteristics of the cohort targeted. A change in the nature of the delivery of PRU provision has the potential to enforce a change in the staffing structure and skills of the workforce.</i>			
<b>Who is affected by the proposals outlined above?</b>	<i>Existing PRU staff Children and young people accessing PRUs Parents/Carers of children and young people accessing PRUs</i>			
<b>How does your service proposal support the outcomes in <a href="#">the Community Vision for Surrey 2030</a>?</b>	<i>Children and young people are safe and feel safe and confident. Everyone benefits from education, skills and employment opportunities that help them succeed in life.</i>			
<b>Are there any specific geographies in Surrey where this will make an impact?</b> (Please tick or specify)	County Wide	X	Runnymede	
	Elmbridge		Spelthorne	
	Epsom and Ewell		Surrey Heath	
	Guildford		Tandridge	
	Mole Valley		Waverley	
	Reigate and Banstead		Woking	
	Not Applicable			
	County Divisions (please specify if appropriate):			
<b>Briefly list what evidence you have gathered on the impact of your proposals?</b>	<i>PRU, SEND and Mainstream headteachers were consulted to consider the design principles and approach.</i>			

## 2. Service Users / Residents

There are 10 protected characteristics to consider in your proposal. These are:

1. Age including younger and older people
2. Disability
3. Gender reassignment
4. Pregnancy and maternity
5. Race including ethnic or national origins, colour or nationality
6. Religion or belief including lack of belief
7. Sex
8. Sexual orientation
9. Marriage/civil partnerships
10. Carers protected by association

*Though not included in the Equality Act 2010, Surrey County Council recognises that socio-economic disadvantage is a significant contributor to inequality across the County and therefore regards this as an additional factor.*

*Therefore, if relevant, you will need to include information on this. Please refer to the EIA guidance if you are unclear as to what this is.*

## AGE

**What information (data) do you have on affected service users/residents with this characteristic?**

*PRU provision impacted by the proposed delivery model include both Primary and Secondary age. Current capacity within Surrey based PRU provision is 242 places.*

Impacts (Please tick or specify)	Positive		Negative		Both	X
Impacts identified	Supporting evidence		How will you maximise positive/minimise negative impacts?	When will this be implemented by?	Owner	
The planning assumption is that the total number of places currently provided is sufficient when considered in the context of current demand, exclusion and population trends and analysis and the potential impact of a more effective outreach and preventative approach. This is on the basis that more Primary age learners' needs can be met with support into the school or by utilising community settings including family centres with specialist outreach support.	2019/20 capacity/Pupil allocation number for Surrey based PRUs.	Sufficiency of places will be refined through consultation and analysis fed into the 10-year strategy and will inform the business case development.	Final phase of building delivery (5-10 years)	SCC Educational Effectiveness, Education Place Planning and Commissioning		
	Surrey PRU numbers on roll (2016/17-2019/20)  Pupil population projections 2020/21-2028/29  Permanent exclusion statistics (2016/17-2019/20)	Development of PRU outreach activity to support mainstream inclusion and minimise the instances of permanent exclusion (as far as is possible).	Academic Year 2020/2021	PRU Headteachers		
The potential co-location of Primary and Secondary phase PRU provision will require careful consideration. The needs and challenges of Primary and Secondary age pupils can differ	Reason given for permanent exclusions.	Accommodation design to be specific to co-location of phases and facilitate appropriate level of separation without compromising the benefits of	SCC Property  PRU Head teachers			

<p>greatly. There is a risk that co-location may result in issues commonly seen at one phase crossing over to the other phase. Additionally there will be wider safeguarding risks to be considered.</p>		<p>this model (i.e. economies of scale and sharing of staff expertise).</p> <p>Implementation of robust safeguarding measures.</p>	<p>Educational Effectiveness</p>	
<p><b>What other changes is the council planning/already in place that may affect the same groups of residents? Are there any dependencies decisions makers need to be aware of</b></p>				
<p>In order to achieve our ambition of transforming Alternative Provision in Surrey, it is proposed that a new delivery model be implemented which would transform the way in which PRUs, largely resource intensive and high-cost services, are used to create a greater impact on the educational outcomes for the vulnerable children and young people accessing them. This goes beyond the physical delivery site to include the nature of the interventions. The emphasis will be firmly focussed on PRUs delivering short-term interventions and proactively supporting inclusion within mainstream settings, thus impacting the level of demand on places within PRUs. This is taken into consideration in the change to the PAN for each phase.</p>				
<p><b>Any negative impacts that cannot be mitigated? Please identify impact and explain why</b></p>				
<p><i>Pupil numbers within PRU settings tend to fluctuate throughout the year. This can result in demand being near capacity at some parts of an academic year, particularly at Key Stage 4, and capacity under-utilised at others.</i></p>				

## Disability

### What information (data) do you have on affected service users/residents with this characteristic?

Pupil Referral Units (PRUs) are educational settings providing education for children who are permanently excluded, sick, or otherwise unable to attend a mainstream or special maintained school. The report, *Alternative Provision Market Analysis* (Isos Partnership, October 2018) highlighted the link between Alternative Provision and Special Educational Needs and Disabilities (SEND) provision; a significant proportion of pupils placed in Alternative Provision require either SEN support or have/are awaiting an Education, Health and Care Plan (EHCP). Recent analysis of SEND data identifies a significant increase in the number of children receiving an EHCP. This is likely to put pressure on PRU capacity in light of the high proportion of those with SEND attending PRUs. It is therefore important to acknowledge any similarities between a PRU and a Special School and the need to ensure accommodation is fit for purpose in relation to this.

Impacts (Please tick or specify)	Positive		Negative		Both	X
Impacts identified	Supporting evidence		How will you maximise positive/minimise negative impacts?	When will this be implemented by?		Owner
The number of pupils who have been excluded, who have an EHCP is small but of concern. The role PRUs play in supporting pupils with SEND, whether permanently excluded or requiring respite from their main setting, will likely change in line with the delivery model. The emphasis being on outreach and short-term intervention will seek to support the reduction in permanent exclusions, particularly of those with SEND.	SEND Needs Analysis – population projections  Data from Management Information System – March Tableau Compendium and April Current data:		Revised PRU delivery model to be a critical component of the wider AP Strategy, thus delivering a coordinated response which achieves prevention and early intervention and minimises the need to escalate the level of support. Close collaboration with local authority SEND services will be required to ensure enough support is implemented for learners with SEND.			SCC Education, Vulnerable Learners and SEND Commissioning

<p>The development of new PRU provision based on assessment of capacity vs demand will ensure pupils with SEND have access to facilities and space that better meet their needs.</p>	<p>Area guidelines for SEND and Alternative Provision, Building Bulletin 104 (BB104).</p>	<p>Building design will be aligned with area guidelines for SEND, thus providing the best possible learning environment</p>	<p>Completed by final phase of building delivery (5-10 years)</p>	<p>Surrey County Council Property Services</p>
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**What other changes is the council planning/already in place that may affect the same groups of residents?  
Are there any dependencies decisions makers need to be aware of**

A comprehensive SEND Capital Strategy is underway which may mitigate the demand on PRU provision. Further to this, Social, Emotional and Mental Health (SEMH) needs are particularly prevalent amongst those referred to PRUs. Commissioning of provision for this cohort will also ease pressures on capacity.

Additional activity to reduce the number of exclusions include:

- The Surrey Educational Psychology Service – whole school approach and targeted support for pupils with SEMH
- Behavioural Support and Specialist Teachers Service – revised package of support recently launched
- Graduated Response – encouraging professionals and parents to seek support earlier
- Emergency Interim Reviews – inclusion and recording of data
- STIPS – realistic and practical advice to improve outcomes/provision for vulnerable pupils
- Speech and Language Therapists – support for young people who are at risk of Permanent Exclusion at SEN support.
- Exploring the link between well-being and exclusions
- Review of arrangements to support SEMH difficulties, including building on the revised healthy schools’ programme
- Review of outreach support services
- Introduction of governance structure and KPIs for SALP Executive Boards
- Developing training of SENCOs in relation to language disorders and difficulties on the emotional wellbeing and behaviour of young people

**Any negative impacts that cannot be mitigated? Please identify impact and explain why**

## 3. Staff

### AGE

#### What information do you have on the affected staff with this characteristic?

The current PRU staffing serves numerous small sites. The development of a smaller number of larger sites may impact on the number of staff required by benefitting from economies of scale.

There is likely to be significant change to working practice and an increased demand for training.

Impacts	Positive		Negative		Both	X
<b>Impacts identified</b>		<b>Supporting evidence</b>	<b>How will you maximise positive/minimise negative impacts?</b>		<b>When will this be implemented by?</b>	<b>Owner</b>
Significant change to working practice/delivery model for those nearing retirement may be unsettling and resistance to change may lead to a decision to consider early retirement.			Implementation of a clear communications strategy regarding the future changes to be developed as early as possible.			PRU Headteachers

#### What other changes is the council planning that may affect the same groups of staff?

#### Are there any dependencies decisions makers need to be aware of

None identified

#### Any negative impacts that cannot be mitigated? Please identify impact and explain why

None identified

## 4. Amendments to the proposals

CHANGE	REASON FOR CHANGE

## 5. Recommendation

Based on your assessment, please indicate which course of action you are recommending to decision makers. You should explain your recommendation in the in the blank box below.

Outcome Number	Description	Tick
<b>Outcome One</b>	<b>No major change to the policy/service/function required.</b> This EIA has not identified any potential for discrimination or negative impact, and all opportunities to promote equality have been undertaken	X
<b>Outcome Two</b>	<b>Adjust the policy/service/function</b> to remove barriers identified by the EIA or better advance equality. Are you satisfied that the proposed adjustments will remove the barriers you identified?	
<b>Outcome Three</b>	<b>Continue the policy/service/function</b> despite potential for negative impact or missed opportunities to advance equality identified. You will need to make sure the EIA clearly sets out the justifications for continuing with it. You need to consider whether there are: <ul style="list-style-type: none"> <li>• Sufficient plans to stop or minimise the negative impact</li> <li>• Mitigating actions for any remaining negative impacts plans to monitor the actual impact.</li> </ul>	
<b>Outcome Four</b>	<b>Stop and rethink</b> the policy when the EIA shows actual or potential unlawful discrimination (For guidance on what is unlawful discrimination, refer to the Equality and Human Rights Commission’s guidance and Codes of Practice on the Equality Act concerning employment, goods and services and equal pay, available <a href="#">here</a> ).	
<i>Please use the box on the right to explain the rationale for your recommendation</i>		

## 6a. Version Control

Version Number	Purpose/Change	Author	Date
1		Dee Turvill	07.04.2020
2	Amendments to focus in line with changes to supporting strategy, particularly around the need for further consultation and the maintenance of existing capacity.	Dee Turvill	04/05/2020

The above provides historical data about each update made to the Equality Impact Assessment. Please do include the name of the author, date and notes about changes made – so that you are able to refer back to what changes have been made throughout this iterative process. For further information, please see the EIA Guidance document on version control.

## 6b. Approval

	Name	Date approved
Approved by*	<i>Liz Mills – Director for Education, Lifelong Learning and Culture</i>	
	<i>Dave Hill - Executive Director for Children, Families and Learning</i>	
	<i>Julie Iles - Cabinet Member for All-Age Learning</i>	

EIA Author	Dee Turvill, Alternative Provision and Participation Manager
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*\*Secure approval from the appropriate level of management based on nature of issue and scale of change being assessed.*

## 6c. EIA Team

Name	Job Title	Organisation	Team Role
Dee Turvill	Alternative Provision and Participation Manager	Surrey County Council	EIA Author
Mike Singleton	Service Manager – Education Place Planning	Surrey County Council	
Helen Kacouris	Service Manager – Educational Effectiveness	Surrey County Council	

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