

Equality Impact Assessment

Equality Impact Assessment for the Proposal to expand Philip Southcote School on a satellite site with a school designation of Moderate Learning Difficulties at Epsom and Ewell High School

Did you use the EIA Screening Tool?

Yes

1. Explaining the matter being assessed

This is a:

- A change to a service or function

Surrey County Council and The Governing Body of Philip Southcote School in partnership with Bourne Education Trust and Epsom & Ewell High School, are proposing to expand Philip Southcote School to create 20 additional places, expanding from 250 places 270 places. This 20-place expansion will be provided on a satellite site at Epsom and Ewell High School. All pupils will have an EHCP specifying Philip Southcote School satellite site at Epsom & Ewell High School as an appropriate placement to meet their individual needs.

Philip Southcote School is a specialist secondary school located in the borough of Runnymede in Surrey. The school has two satellite sites, one at Kings International College in the borough of Surrey Heath, and one at Chertsey High School in the borough of Runnymede. The school provides highly specialist teaching and support primarily for pupils with a primary need of Moderate Learning Difficulties (MLD). The school currently admits 3 forms of entry (30 pupils) into each year group in National Curriculum Years 7 to 11 and 50 pupils across National Curriculum Years 12 to 14.

Epsom & Ewell High School is an Academy within Bourne Education Trust. It is an 8 form entry Secondary School in the borough of Epsom & Ewell with a published admission number (PAN) of 240. The school has resourced provision for hearing impaired/deaf pupils.

The proposal will impact:

- Parents and families of pupils currently attending Philip Southcote School or likely to attend the school in the future
- Parents and families of pupils currently attending Epsom and Ewell High School or likely to attend the school in the future
- Staff at Philip Southcote School and Epsom and Ewell High School
- Local children and young people with a school designation of Moderate Learning Difficulties (MLD) who will have an opportunity to gain a place at a specialist school or centre locally

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How does your service proposal support the outcomes in [the Community Vision for Surrey 2030](#)?

- 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
- Communities are welcoming and supportive, especially of those most in need, and people feel able to contribute to community life

Are there any specific geographies in Surrey where this will make an impact?

- Epsom & Ewell
- Runnymede

Assessment team

Detail here who you have involved with completing this EIA:

- Rachael Wardell, Surrey County Council, Executive Director Children Families and Learning
- Liz Mills, Surrey County Council, Director of Education and Learning
- Jane Edwards, Surrey County Council Assistant Director of Education
- Eamonn Gilbert, Surrey County Council, Assistant Director Commissioning
- Jodi Emery, Surrey County Council, Service Manager, Commissioning
- Mike Singleton, Surrey County Council, Service Manager, Education Place Planning
- Emily George, Surrey County Council, Assistant Director, SEND Transformation
- Emilie Williams Jones, Surrey County Council, Programme Manager SEND Capital Programme
- Jane Keenan, Surrey County Council, Commissioning Manager, Education Place Planning
- Tess Jerwood, Surrey County Council, Commissioning Assistant, Education Place Planning
- Lee Jerwood, Philip Southcote School, Headteacher
- Mary Rome, Bourne Education Trust, Education Director
- James Newman, Epsom and Ewell High School, Headteacher
- David Burr, Chair of Governors, Philip Southcote School
- Surrey County Council Capital Programme Board

Consultation Information:

Surrey County Council, Philip Southcote School and Epsom and Ewell High School consulted on the proposal to expand Philip Southcote School on a satellite site with a school designation of Moderate Learning Difficulties (MLD) at Epsom and Ewell High School

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The aim of the consultation was to seek views on the proposal from all interested parties, particularly from pupils and their families who attend Philip Southcote School and Epsom and Ewell High School, pupils and their families who may attend the schools in the future, local schools and the local community.

The **informal consultation** was open from 27 Sept to 6 Nov 2022. The associated documentation was published on the [Surrey County Council 'Surrey Says' website](#) and circulated to local stakeholders. Interested parties were invited to return responses to the consultation via an online form or alternatively email or post responses.

There were 20 responses to the consultation. 95% of respondents agreed with the proposal to expand Philip Southcote School on a satellite site at Epsom and Ewell High School.

25% of respondents stated their belief that the expansion of Philip Southcote School on a satellite site at Epsom and Ewell High School would have a positive impact for children and young people. Many respondents mentioned the terms “*benefit*”, “*opportunity*” and “*support*” when expressing their positive thoughts on the proposal. One comment declared that “*there are many many other children who would benefit from the facilities this would provide*”.

A public meeting online was held on 19 October 2022. Three prospective parents attended the meeting.

Statutory Notices were published from 14 November – 12 December 2022. The associated documentation was published on the [SurreySays Website](#) and circulated to local stakeholders. Interested parties were invited to return responses to the consultation via an online form or alternatively email or post responses.

There were 4 responses to the consultation. 100% of respondents agreed with the proposal to expand Philip Southcote School on a satellite site at Epsom and Ewell High School.

2. Service Users / Residents

Who may be affected by this activity?

There are 9 protected characteristics (Equality Act 2010) considered in the 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

Though not included in the Equality Act 2010, Surrey County Council recognises that there are other vulnerable groups which significantly contribute to inequality across the county and therefore they should also be considered within EIAs. If relevant, you will need to include information on the following vulnerable groups.

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- Members/Ex members of armed forces
- Adult and young carers*
- Those experiencing digital exclusion*
- Those experiencing domestic abuse*
- Those with education/training (literacy) needs
- Those experiencing homelessness*
- Looked after children/Care leavers*
- Those living in rural/urban areas
- Those experiencing socioeconomic disadvantage*
- Out of work young people)*
- Adults with learning disabilities and/or autism*
- People with drug or alcohol use issues*
- People on probation
- People in prison
- Migrants, refugees, asylum seekers
- Sex workers
- Children with Special educational needs and disabilities*
- Adults with long term health conditions, disabilities (including SMI) and/or sensory impairment(s)*
- Older People in care homes*
- Gypsy, Roma and Traveller communities*
- Other (describe below)

(*as identified in the Surrey COVID Community Impact Assessment and the Surrey Health and Well-being Strategy)

Impacts have been identified under the protected characteristics **Age including younger and older people** and **Disability**. The following vulnerable groups have also been identified, **Children with Special educational needs and disabilities**.

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Disability

(Including Children with Special Educational Needs and Disabilities and Adult and Young carers)

Pupils at the school

There are 202 pupils currently on roll at Philip Southcote School.

Table 1: Number of Pupils on roll at Philip Southcote School by National Curriculum Year (NCY) Group Sept 2022

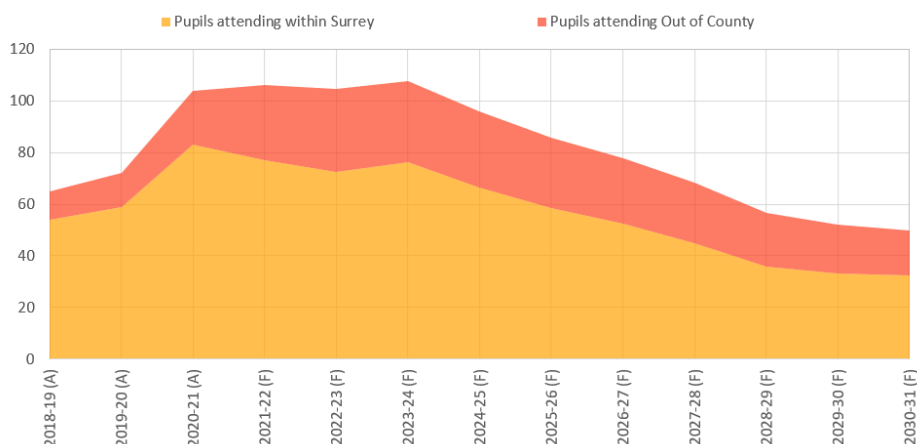
	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Total
Number of pupils currently at Philip Southcote School	38	41	28	30	19	19	22	5	202

Pupils who may attend the school in the future

The expansion on the new site will be for up to 20 children with Learning and Additional Needs (LAN), from Year 7-11, with an Education Health and Care Plan (EHCP) in Surrey.

Graph 1 shows North East projections indicate 66% growth in the total number of pupils with a primary need of Moderate Learning Difficulties, with EHCPs who need a specialist school or SEN unit place from 2018-19 (65) to the peak in 2023-24 (108), with 32% growth (86) remaining in 2025-26.

Graph 1 North East: Forecast of demand for specialist school and SEN Unit places from Year 7 to Year 11 for pupils with an EHCP with a primary need of Moderate Learning Difficulties (MLD)



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Current travel patterns for pupils attending Specialist Schools

Table 2 shows the travel patterns for pupils with Cognition and Learning who live in the three boroughs in the North East. Cognition and Learning includes the primary needs; Moderate Learning Difficulties (MLD), Severe Learning Difficulties (SLD), Profound and Multiple Learning Difficulties (PMLD) and Specific Learning Difficulties (SpLD). The table shows only 1% of pupils with cognition and learning needs living in Epsom & Ewell, attend a Specialist School within the borough. Across the North West approximately 50% of pupils with cognition and learning needs travel 6 miles or more for education.

Table 2: Travel patterns for pupils with Cognition and Learning Needs who reside in North East Surrey and are educated in a Specialist School

Borough	Educated in Borough/ District	Educated in Quadrant	Educated Out of County	Educated in Independent provision	Travel 6 Miles or More for Education
Epsom & Ewell	1%	3%	27%	19%	49%
Spelthorne	12%	34%	13%	15%	50%
Elmbridge	11%	25%	15%	20%	51%
Surrey Total	33%	58%	10%	17%	52%

The additional places at Philip Southcote School on a satellite site at Epsom and Ewell High School will help reduce the percentage of pupils with Learning and Additional Needs (LAN) who travel out of borough, quadrant and county and will reduce the number of pupils educated in independent provision.

Consultation responses: positive Impacts

20% of respondents agreed that the expansion of Philip Southcote School on a satellite site at Epsom and Ewell High would be positive due to the expertise of the school staff at both schools.

“The expansion of a well-reputed education setting like Philip Southcote School should be welcomed by all”

“Will be a great opportunity as the school staff are amazing already” (parent of a child at Epsom and Ewell High School)

40% of respondents felt that the expansion is welcomed as there is a need for more specialist school places. Respondents referred to the proposal providing *“much needed additional school places”*.

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“As the mother of a child with SEND, I know from experience that special schools are few and far between”

The Report to Surrey County Council on 25 January 2022 [Developing Local Special Educational Needs And Disability \(Send\) Provision In Surrey To Meet Demand From 2023/24 Onwards](#) outlines the delivery of additional specialist school places and intended benefits to Surrey’s children, young people and residents:

1. Benefits realisation ensures Surrey’s maintained specialist education provision is fit for purpose and creates additional employment/supported internship opportunities for residents around areas of expansion.
2. Children, young people, and families can access the same level of high-quality support wherever they live in Surrey. We have a good, shared understanding of our children and young people who have SEND in Surrey and our support offer matches their identified needs.
3. Expanding Surrey’s specialist provision aligns with the Preparation for Adulthood programme and strategy for Post-16 to create local further education and employment pathways such as apprenticeships and supported internships. This enables young people who have SEND to make a successful transition to adulthood and secure employment.
4. Capacity created locally will also make certain that SEND home to school transport distance and costs are reduced so that pupils attend their closest most appropriate school with shorter journey times. Opportunities for developing independent travel skills can be maximised as a result of children and young people being educated closer to home. This will also address local congestion around school sites as well as traffic flow around the county, which will be of benefit to Surrey’s Green Agenda
5. The distribution and occupancy of current Specialist Schools and SEN Units in mainstream schools clearly illustrates that there is insufficient provision of Autism and Communication & Social Interaction Needs, Moderate Learning Difficulties, Severe Learning Difficulties and Social Emotional Mental Health Needs Special places.
6. The approved remedification and expansion programme will ensure that additional places are matched appropriately to need type, phases of education and geographic locations.

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Describe here suggested mitigations to inform the actions needed to reduce inequalities.

A Question and Answer document has been published to answer any questions and address potential negative impacts, the full document is published at www.surreysays.co.uk on the Statutory Notices Consultation page.

	Question	Response
1.	Where in the school is the proposed provision?	The provision will be centrally located within Epsom and Ewell High School and will be part of a bigger inclusion centre.
2.	What building work will be required for the project?	The project is a refurbishment and redevelopment of current space within Epsom and Ewell High School, therefore no external building work is required.
3.	What actions will be put in place in terms of integration of the pupils?	The aim is for the provision to be a fully inclusive environment. This is a hybrid model and integration will need to take place academically as well as socially and emotionally. Timetables are managed individually for each pupil. The plan would be for pupils to spend part of their day accessing learning and support in the Philip Southcote provision and then also have access to mainstream classes for part of the day.
4.	Will pupils feel part of Philip Southcote School or Epsom & Ewell High.	<p>Pupils will wear the Epsom & Ewell High uniform and feel part of the school with inclusion in mainstream lessons.</p> <p>However they will be roll at Philip Southcote School and the staff who work specifically in the centre at Epsom & Ewell High will be employed by Philip Southcote School. Therefore pupils will benefit from the specialist teaching of a Specialist School while attending mainstream school with their peers in their local community.</p>

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5.	How much contact will pupils at the satellite site have with Philip Southcote School main site in Runnymede?	Pupils will be primarily based at Epsom and Ewell High School, however there are occasions where pupils from the provision may have the opportunity to attend Philip Southcote main school site in Addlestone Moor to participate in specific activities e.g. outdoor or sporting activities.
6.	When are you hoping to admit the first students into the provision?	The proposal is that the first pupils will be admitted to the provision at Epsom and Ewell High in September 2023.
7.	How will parents know about the provision if it has not been formally agreed yet?	<p>As this project is part of the SEND Capital Programme, Surrey County Council are working at pace to create places as quickly as possible. Now that the consultation is open, SEND case workers will be letting parents know about the provision. Philip Southcote and Epsom and Ewell High School are giving information to prospective students.</p> <p>Formal placements can be made after the Cabinet Member for Education and Learning decision meeting, scheduled 31 January 2023.</p>
8.	How will the provision be operated?	<p>Staff employed by Philip Southcote School will be based at the centre at Epsom & Ewell High. Philip Southcote School will work in partnership with Bourne Education Trust and Epsom & Ewell High to provide an inclusive specialist centre at a mainstream school. Philip Southcote have two satellite sites up and running at Kings International College and Chertsey High. The provision at Epsom and Ewell High School will be modelled on the two current centres in mainstream schools. The model aims to promote inclusivity and will provide a better education for children.</p> <p>Both Epsom & Ewell High and Chertsey High are Academies and part of the Bourne Education Trust. Philip Southcote School and Kings</p>

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		International School are associates of the Bourne Education Trust and all the schools have strong partnerships.
9.	Will the provision provide support to children who have social and emotional difficulties, and for pupils who have both ASD and MLD?	<p>The provision is for pupils with Moderate Learning Difficulties (MLD) who would benefit from access to mainstream classes. Pupils would have access to parts of the curriculum as well as the social aspect of attending a mainstream school close to home.</p> <p>The needs of each pupil wishing to attend the provision would be considered on an individual basis through the EHCP process and some pupils may have additional needs alongside a primary need of Moderate Learning Difficulties.</p> <p>Autistic pupils and those with communication and interaction needs may need a different type of SEN unit, mainstream or Specialist School placement.</p> <p>There are two Secondary Schools with SEN units for autistic pupils and those with communication and interaction needs in North East Surrey, Hinchley Wood School and Three Rivers Academy. Surrey County Council will continue to look at opportunities to create more SEN Units in mainstream Secondary schools across Surrey as part of the SEND Capital Programme.</p>
10.	Are there proposals within the SEND Capital Programme to work with neighbouring counties?	<p>Surrey County Council works closely with neighbouring boroughs to ensure there is sufficient provision across areas.</p> <p>Surrey County Council has a duty to provide places for pupils living in Surrey and therefore the SEND Capital Programme's remit is within the</p>

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		county of Surrey. However the SEND admissions team make placements across the border and will continue to, where that is the nearest most suitable placement to meet a pupil's needs. The SEND Commissioning team also work with independent providers both in Surrey and out of county.
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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 decision makers need to be aware of?

The proposal to expand Philip Southcote School on a satellite site at Epsom and Ewell High is part of the strategy developed by Surrey County Council to expand the specialist education estate by more than 2,300 places to meet projected demand in the long-term.

SEND Capital Programme Cabinet Report 25 January 2022:

[Developing Local Special Educational Needs and Disability \(Send\) Provision in Surrey to Meet Demand From 2023/24 Onwards](#)

Any negative impacts that cannot be mitigated?

No

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Age including younger and older people

The proposal positively impacts pupils aged 11 to 16 years old with moderate learning difficulties who need a specialist school place with access to inclusion in a mainstream school.

Describe here suggested mitigations to inform the actions needed to reduce inequalities.

N/A

What other changes is the council planning/already in place that may affect the same groups of residents? Are there any dependencies decision makers need to be aware of?

The proposed expansion of Philip Southcote School on a satellite site at Epsom and Ewell High School is part of the strategy developed by Surrey County Council to expand the specialist education estate by more than 2,300 places to meet projected demand in the long-term.

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Any negative impacts that cannot be mitigated?

No

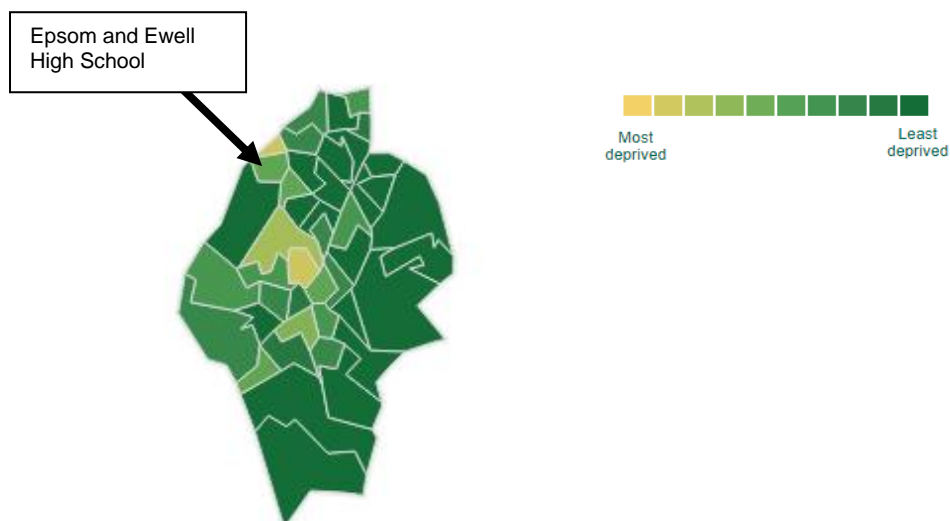
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Socio economic disadvantage

[The Indices of deprivation 2019](#) finds that 2 out of 43 Lower Layer Super Output Areas (LSOA) in Epsom & Ewell are between 20% - 30% most deprived area in the country. Only 4 out of 60 areas are more deprived than 50% of England. Although 21 out of 60 Lower Layer Super Output Areas (LSOA) in Epsom & Ewell are in the least deprived 10% in the country there are pockets of deprivation in the borough. Epsom and Ewell High School is close to LSOA 002C which is in the 30% - 40% most deprived areas in the country.

Figure 1: English Index of Multiple Deprivation Epsom & Ewell

Map of Epsom & Ewell



Source: Indices of deprivation 2019 in Surrey by Surrey-i helpdesk

Positive impact: More families will be able to access specialist provision closer to home.

Describe here suggested mitigations to inform the actions needed to reduce inequalities.

Placements co-ordinated through the SEND admissions process will place pupils at the appropriate placement identified through the Education Health and Care Plan. Additional local places will mean more pupils will be able to attend provision local to home

What other changes is the council planning/already in place that may affect the same groups of residents? Are there any dependencies decision makers need to be aware of?

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The development of the proposed expansion of Philip Southcote School on a satellite site at Epsom and Ewell high School is part of the strategy developed by Surrey County Council to expand the specialist education estate by more than 2,300 places to meet projected demand in the long-term.

SEND Capital Programme Cabinet Report 25 January 2022:

[Developing Local Special Educational Needs and Disability \(Send\) Provision in Surrey to Meet Demand From 2023/24 Onwards](#)

Any negative impacts that cannot be mitigated?

No

3. Staff

Any impacts for staff with protected characteristics will be considered by the Federation of Manor Mead and Walton Leigh Schools. If the proposal is agreed any changes for existing staff contracts would be subject to a full staff consultation with a separate Equality Impact Assessment. Examples: Staff who are pregnant or on maternity leave; have a disability; have caring responsibilities; are negatively impacted because of any other protected characteristic listed on page 4. This would be coordinated by the Federation in partnership with their HR provider. Additional staff would be employed to resource the expansion of Manor Mead School.

Positive impact: Development opportunities for staff with the expansion on a satellite site at Epsom and Ewell High

Describe here suggested mitigations to inform the actions needed to reduce inequalities.

Communication and consultation with staff throughout the decision-making process.

What other changes is the council planning/already in place that may affect the same groups of residents? Are there any dependencies decision makers need to be aware of?

The development of the proposed expansion of Philip Southcote School on a satellite site at Epsom and Ewell High School part of the strategy developed by Surrey County Council to expand the specialist education estate by more than 2,300 places to meet projected demand in the long-term.

SEND Capital Programme Cabinet Report 25 January 2022:

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Any negative impacts that cannot be mitigated?

No.

4. Recommendation

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

- **Outcome One: No major change to the policy/service/function required.** This EIA has not identified any potential for discrimination or negative impact, and all opportunities to promote equality have been undertaken
- **Outcome Two: Adjust the policy/service/function** to remove barriers identified by the EIA or better advance equality. Are you satisfied that the proposed adjustments will remove the barriers you identified?
- **Outcome Three: Continue the policy/service/function** 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:
 - Sufficient plans to stop or minimise the negative impact
 - Mitigating actions for any remaining negative impacts plans to monitor the actual impact.
- **Outcome Four: Stop and rethink 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).

Recommended outcome:

- **Outcome One: No major change to the policy/service/function required.** This EIA has not identified any potential for discrimination or negative impact, and all opportunities to promote equality have been undertaken.

Explanation:

No negative equalities impacts have been identified.

5. Action plan and monitoring arrangements

There is no current action plan as no negative impacts have been identified

6a. Version control

Version Number	Purpose/Change	Author	Date
0.1	Draft	Tess Jerwood	27 September 2022
0.2	Amendments to draft at end of Informal Consultation	Tess Jerwood	23 November 2022
0.3	Final draft at the end of the Statutory Notice period	Jane Keenan	10 January 2023
1	Final version for Cabinet Member of Education and Learning Decision Meeting	Jane Keenan	20 January 2023

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6b. Approval

Secure approval from the appropriate level of management based on nature of issue and scale of change being assessed.

Approved by	Date approved
Head of Service - Liz Mills	
Executive Director – Rachael Wardell	19/01/2023
Cabinet Member – Clare Curran	31/01/2023
Directorate Equality Group – Liz Mills	

EIA author: Jane Keenan, Commissioning Manager, Education Place Planning

6c. EIA Team

Name	Job Title	Organisation	Team Role
Jane Keenan	Commissioning Manager	SCC	Author, Project Manager
Tess Jerwood	Commissioning Assistant	SCC	Project Group member
Emilie Williams Jones	Programme Manager, SEND Capital Programme	SCC	Programme Manager
Lee Jerwood	Headteacher	Philip Southcote School	Service Expert
Mary Rome	Education Director	Bourne Education Trust	Service Expert
James Newman	Headteacher	Epsom and Ewell High School	Service Expert
Liz Mills	Director of Education and Learning	SCC	Sponsor

If you would like this information in large print, Braille, on CD or in another language please contact us on:

Tel: 03456 009 009

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Textphone (via Text Relay): 18001 03456 009 009

SMS: 07860 053 465

Email: contactcentre@surreycc.gov.uk

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