

Equality Impact Assessment

Equality Impact Assessment for the Proposal to expand the SEN Unit at Hythe Primary School

Did you use the EIA Screening Tool?

Yes

1. Explaining the matter being assessed

This is a:

- Change to a service or function

Hythe Primary School is a two-form entry (2FE) primary school in the borough of Runnymede in Surrey.

This consultation is a proposal to secure places for autistic pupils and those with communication and interaction needs by expanding the SEN unit at Hythe Primary School from 25 places to 41 places. The SEN Unit, known as the Harbour Centre, will formally become dual-designated as ASD/MLD¹.

The additional 16 places will be for autistic pupils and those with speech and language/communication needs from Year 3 to Year 6. There are no proposed changes to the current 16 places for pupils with moderate learning difficulties aged 7 to 11 years. All pupils will have an Education, Health and Care Plan (EHCP).

The proposal will impact:

- Pupils currently attending Hythe Primary School
- Staff at Hythe Primary School
- Parents and families of pupils currently attending Hythe Primary School or likely to attend the school in the future.

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

¹ Autistic Spectrum Disorder (ASD) is the term used by the Department for Education (DfE) as the school designation that meets the needs of autistic pupils and those with communication and interaction needs. Moderate Learning Difficulties (MLD) is the DfE school designation, known locally in Surrey as Learning and Additional Needs (LAN).

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

- 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
- Carrie Trail, Surrey County Council Assistant Director of Education
- Eamonn Gilbert, Surrey County Council, Assistant Director Commissioning
- Jodi Emery, Surrey County Council, Service Manager, SEND 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 and AP Capital Programmes
- Jane Keenan, Surrey County Council, Commissioning Manager, Education Place Planning
- Kim O'Malley, Surrey County Council, Commissioning Assistant
- Amy Peart, Hythe Primary School, Headteacher
- Mitali Thapar, Hythe Primary School, Chair of Governing Body
- Surrey County Council Capital Programme Board

Consultation Information:

Surrey County Council and Hythe Primary School consulted on the proposal to expand the SEN unit at Hythe Primary School, expanding from 25 places to 41 places..

The aim of the consultation was to seek views on the proposal from all interested parties, particularly from pupils and their families who attend Hythe Primary School, pupils and their families who may attend the school in the future, and the views of the local community.

The informal consultation was open from Monday 7 November to Monday 5 December 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.

A public meeting was offered on 21 November 2022 at 6pm.

The informal consultation analysis is published on the statutory notices page at [SurreySays](#).

Statutory Notices were published from 13 January 2023 to 10 February 2023. 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.

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Respondents had the opportunity to add comments at the end of the survey. The full analysis of the consultation period can be found in the analysis document on [SurreySays](#).

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.

- 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)

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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** and **those experiencing socioeconomic disadvantage**.

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Disability

(Including Children with Additional Needs and Disabilities and Adult and Young carers)

Pupils at the school

There are 427 pupils currently on roll at the school. Pupils currently placed by SCC and attending the SEN Unit are included in this number.

Table 1: Number of pupils on roll at Hythe Primary School by National Curriculum Year (NCY) Group (October 2022)

	Year R	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Total
Specialist unit	3	3	3	4	4	4	4	25
Mainstream school	59	58	60	58	60	57	50	402

Pupils who may attend the school in the future

It is proposed that:

1. The SEN Unit, known as the Harbour Centre, will formally become dual-designated as ASD/MLD₁. The expanded provision will provide a total number of 25 places for autistic pupils and those with communication and interaction needs aged 4 to 11 years (3 per year group in Year R to Year 2, 4 per year group in Year 3 to Year 6). There are no proposed changes to the current 16 places for pupils with moderate learning difficulties aged 7 to 11 years.
2. There will be no change to the mainstream published admission number (PAN) of 60.
3. The 41 SEN Unit pupils will be above the mainstream published admission number (PAN).
4. All pupils placed at the SEN Unit by Surrey County Council would have an EHCP specifying the school as an appropriate placement to meet their individual needs.

In the academic year 2020-2021, 1190 of Surrey resident pupils aged 4-11 years old who are autistic or have communication & interaction needs attended SEN units or specialist schools. 13% of this cohort were placed out of county due to a lack of placement availability in Surrey. Latest sufficiency modelling projects growth of 15% from 1190 in 2020-21 to 1368 in 2025-2026.

In the academic year 2020-2021, 149 of Surrey resident pupils aged 4-11 years old who have a primary need of MLD attended SEN units or specialist schools. 8% of this cohort were placed out of county. Latest sufficiency modelling projects decreasing demand of -45% from 149 in 2020-21 to 82 in 2029-2030. Although there is a projected decline in demand for MLD places, the existing places are required to sustain current demand.

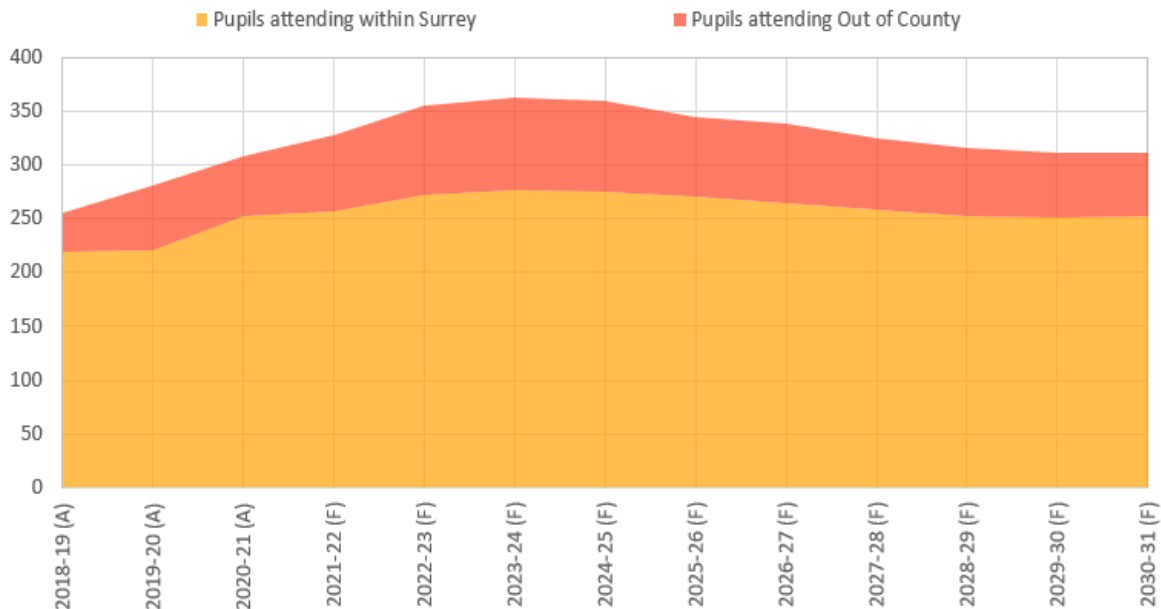
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Due to the location of the school being close to the border of the North East quadrant of Surrey, it is reasonable to expect that pupils may attend the SEND Unit from both the North West and North East quadrants. Therefore, the data below has been provided for both.

Autistic pupils and those with communication and interaction needs

Graph 1 shows that North East projections indicate 17% growth in the total number of autistic pupils and those with communication & interaction needs, with EHCPs who need a specialist school or SEN unit place from 2020-21 (309) to the peak in 2023-24 (363), with 12% growth remaining in 2025/26 (345).

Graph 1: North East - Forecast of demand for special school and SEN Unit places from Year R to Year 6 for pupils with an EHCP with a primary need of autism or communication and interaction needs

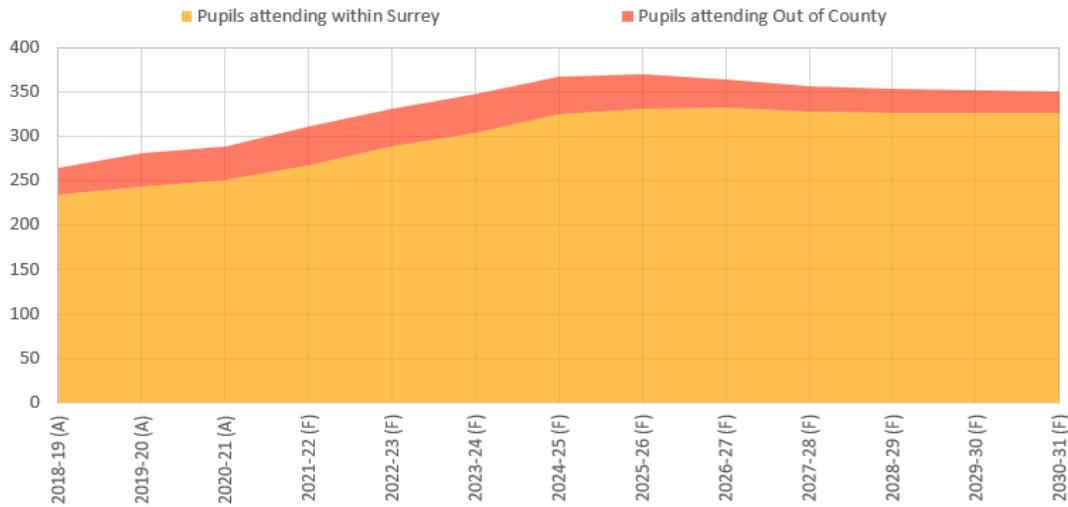


edge-ucate SEN

Graph 2 shows that North West projections indicate 28% growth in the total number of autistic pupils and those with communication & interaction needs, with EHCPs who need a specialist school or SEN unit place from 2020-21 (311) to the peak in 2025-26 (370), with 21% growth remaining in 2030/31 (351).

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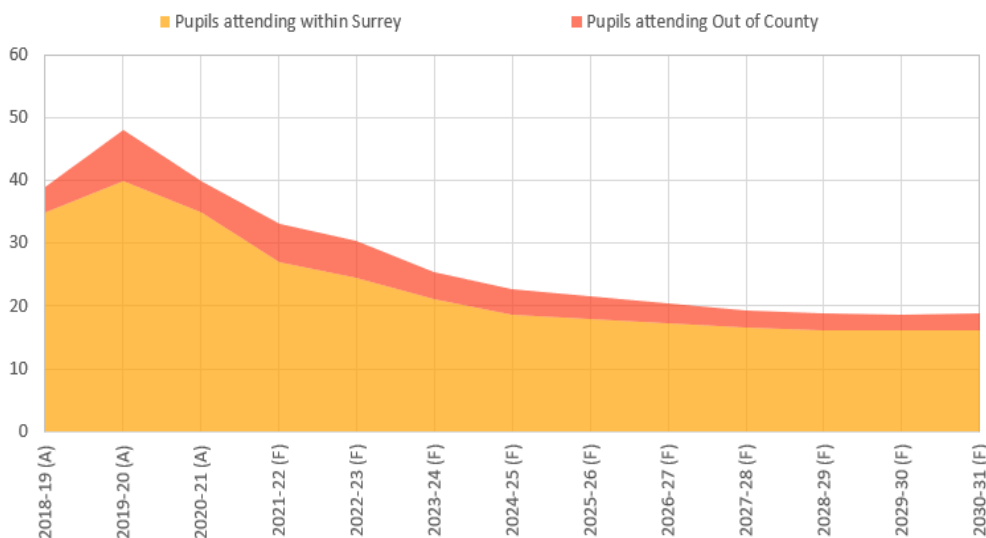
Graph 2: North West - Forecast of demand for special school and SEN Unit places from Year R to Year 6 for pupils with an EHCP with a primary need of autism or communication and interaction needs



Pupils with a primary need of Moderate Learning Difficulties (MLD)

Graph 3 shows that North East projections indicate -53% decrease in demand in the total number of pupils with the primary need Moderate Learning Difficulties (MLD) in their EHCP, who need a specialist school or SEN unit place from 2020-21 (40) to 19 in 2030/31 (19).

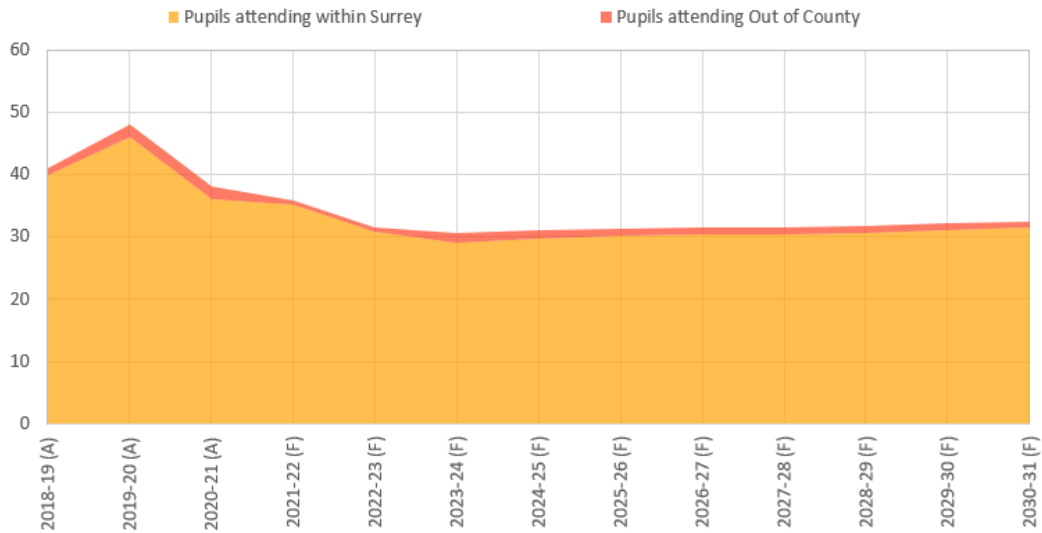
Graph 3: North East - Forecast of demand for special school and SEN Unit places from Year R to Year 6 for pupils with an EHCP with a primary need of Moderate Learning Difficulties (MLD)



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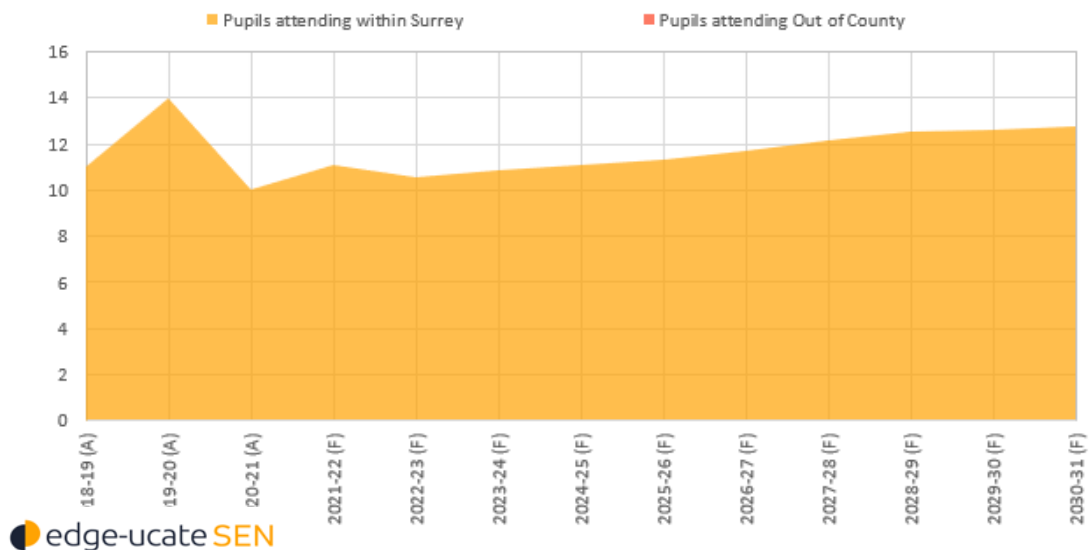
Graph 4 shows that North West projections indicate -19% decrease in demand in the total number of pupils with the primary need Moderate Learning Difficulties (MLD) in their EHCP, who need a specialist school or SEN unit place from 2020-21 (38) to the lowest in 2023-24 (31), with -14% decrease remaining in 2030/31 (33).

Graph 4: North West - Forecast of demand for special school and SEN Unit places from Year R to Year 6 for pupils with an EHCP with a primary need of Moderate Learning Difficulties (MLD)



The two graphs below split the forecast demand for Moderate Learning Difficulties (MLD) into Key Stage 1 (Years R to 2) and Key Stage 2 (Years 3 to 6). Graph 5 indicates that the demand in the North West will increase by 29% from 2021/22 to the end of the planning period (2030/31) for pupils in Key Stage 1.

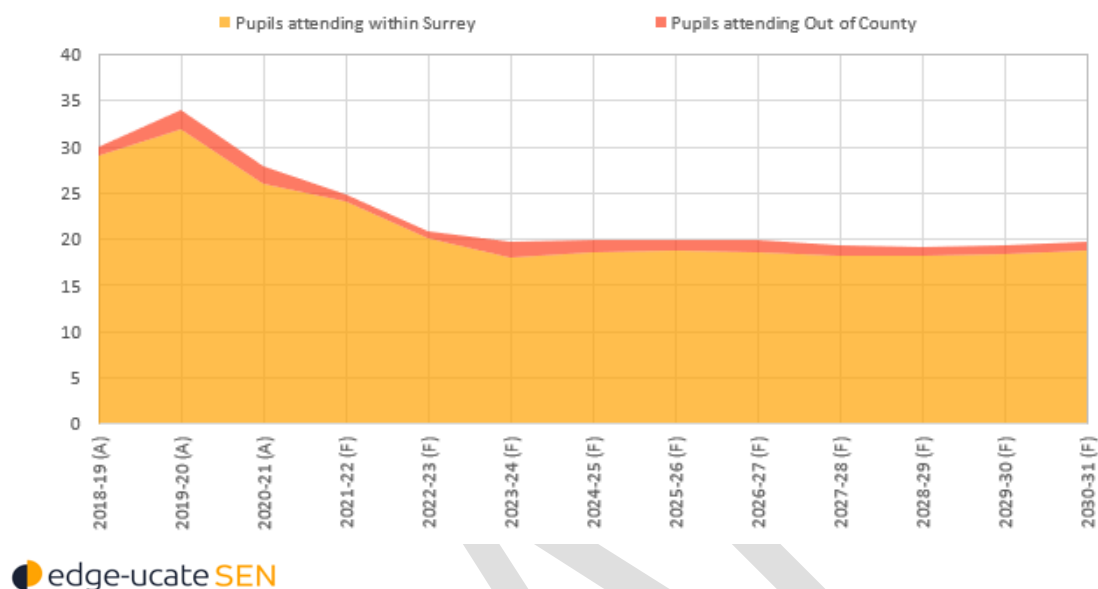
Graph 5: North West - Forecast of demand for special school and SEN Unit places from Year R to Year 2 for pupils with an EHCP with a primary need of Moderate Learning Difficulties (MLD)



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Graph 6 indicates that demand for MLD places in the North West for pupils in Key Stage 1 is predicted to drop by 29% in the period between 2021/22 to 2030/31.

Graph 6: North West - Forecast of demand for special school and SEN Unit places from Year 3 to Year 6 for pupils with an EHCP with a primary need of Moderate Learning Difficulties (MLD)



Positive Impacts:

- The expansion will provide specialist education for autistic pupils and those with communication and interaction needs who would also benefit from being part of a wider mainstream school community.
- A school place that is closer to home will positively impact students, parents and carers who will have the opportunity to be part of a school community closer to home as well as reducing potential travel time for centre students and their families.

The Report to Surrey County Council on 28 March 2023 [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 additional needs and disabilities in Surrey and our support offer matches their identified needs.

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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 additional needs and disabilities to make a successful transition to adulthood and secure employment.
4. Capacity created locally will also make certain that additional needs and disabilities 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 approved remodification and expansion programme will ensure that additional places are matched appropriately to need type, phases of education and geographic locations.

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?

N/A

The proposed expansion of the SEN unit at Hythe Primary School is part of the strategy developed by Surrey County Council to expand the specialist education estate by more than 2,440 places to meet projected demand in the long-term.

SEND Capital Programme Cabinet Report 28 March 2023:

[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

Age including younger and older people

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The proposal positively impacts autistic pupils and those with communication and interaction needs aged 4 years to 11 years old 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 at Hythe Primary School's SEN Unit is part of the strategy developed by Surrey County Council to expand the specialist education estate by more than 2,440 places to meet projected demand in the long-term.

SEND Capital Programme Cabinet Report 28 March 2023:

[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

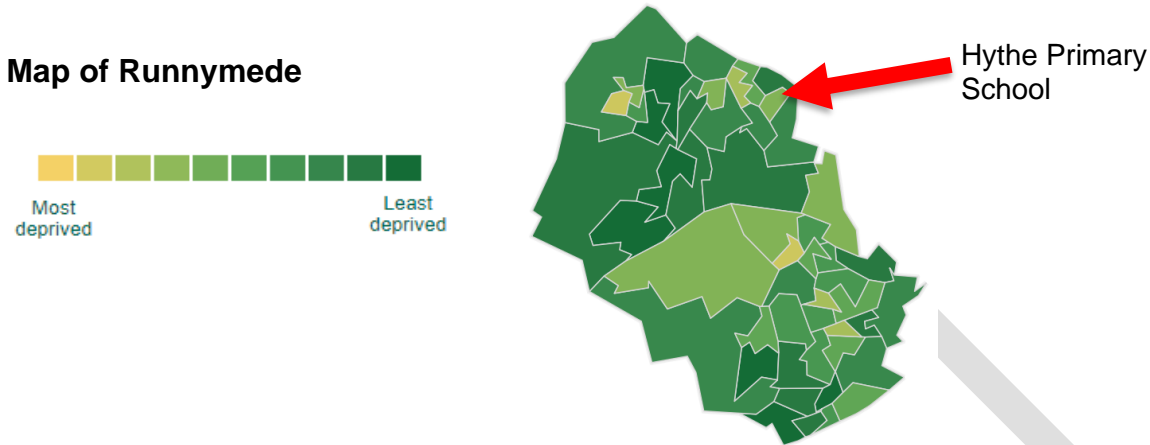
Socio economic disadvantage

[The Indices of deprivation 2019](#) finds that 2 out of 53 Lower Layer Super Output Areas (LSOA)

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in Runnymede are between 20% - 30% most deprived area in the country. 11 out of 53 areas are more deprived than 50% of England. 7 out of 53 Lower Layer Super Output Areas (LSOA) in Runnymede are in the least deprived 10% in the country, however there are pockets of deprivation in the borough.

Figure 1: English Index of Multiple Deprivation Spelthorne and Runnymede



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

Positive impact: More families will be able to access Specialist School 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?

The proposed expansion of the SEN Unit at Hythe Primary School is part of the strategy developed by Surrey County Council to expand the specialist education estate by more than 2,440 places to meet projected demand in the long-term.

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Any negative impacts that cannot be mitigated?

No

3. Staff

Any impacts for staff with protected characteristics will be considered by the Governing Body of Hythe Primary School.

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 proposed expansion of the SEN Unit at Hythe Primary School is part of the strategy developed by Surrey County Council to expand the specialist education estate by more than 2,440 places to meet projected demand in the long-term.

SEND Capital Programme Cabinet Report 28 March 2023:

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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 (**do we need to address negative impact concerns?**).

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	Kim O'Malley	February 2023
0.2	Amendments to draft at end of Informal Consultation	Kim O'Malley	March 2023
0.3	Final draft version at the end of the Statutory Notice period	Lauren Comer	March 2023
1	Final version for Cabinet Member Meeting	Lauren Comer	April 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 (Emily George)	4 April 2023
Executive Director – Rachael Wardell	13 April 2023
Cabinet Member – Clare Curran	12 April 2023
Directorate Equality Group – Liz Mills	

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

6c. EIA Team

Name	Job Title	Organisation	Team Role
Lauren Comer	Commissioning Manager	SCC	Author, Project Manager
Kim O'Malley	Commissioning Assistant	SCC	Project Group member
Emilie Williams Jones	Programme Manager, SEND and AP Capital Programmes	SCC	Programme Manager
Amy Peart	Headteacher	Hythe Primary	Service Expert
Mitali Thapar	Chair of Governors	Hythe Primary	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:

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