

Equality Impact Assessment

Equality Impact Assessment for the Proposal to create an SEN (Special Educational Needs) unit at Epsom Primary & Nursery School for Autistic pupils and those with Communication & Interaction Needs

Did you use the EIA Screening Tool?

Yes

1. Explaining the matter being assessed

This is a:

- Change to a service or function

Epsom Primary and Nursery School is a two-form entry primary school in the borough of Epsom & Ewell in Surrey. The school was rated 'good' by Ofsted in July 2019. The Governing Body of Epsom Primary and Nursery School are in the process of converting to an academy and joining the Bourne Education Trust. The Academy conversion is separate to the consultation to create a SEN Unit and further information can be found on the school's website. The Local Authority will decide on the proposal to create a SEN Unit at Epsom Primary and Nursery School before the Academy conversion is finalised.

The proposal will impact:

- Pupils currently attending Epsom Primary & Nursery School
- Staff at Epsom Primary & Nursery School
- Parents and families of pupils currently attending Epsom Primary & Nursery 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

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

- Epsom & Ewell

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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 Winterbone, 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
- Jackie Drysdale, Surrey County Council, Commissioning Assistant, Education Place Planning
- Michelle Pollard, Epsom Primary & Nursery Schools, Headteacher
- Lisa Kent, Epsom Primary & Nursery, Chair of Governing Body,
- Surrey County Council Capital Programme Board

Consultation Information:

Surrey County Council and Epsom Primary & Nursery School consulted on the proposal to create an SEN unit at Epsom Primary & Nursery School for Autistic pupils and those with Communication & Interaction Needs

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

The **informal consultation** was open from 22 February to 1 April 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 online was offered on 10 March 2022, however, there were no attendees. The Commissioning Manager for the NE attended a Parent Forum at the school on 16 March 2022 and presented an overview of the proposal and a Q&A session

There were 11 responses to the consultation

Do you agree with the proposal to open an SEN Unit at Epsom Primary & Nursery School?

11 (100%) respondents agreed with the proposal.

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

Statutory Notices were published from 25 April – 24 May 2022. The associated documentation was published on the [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 5 responses to the consultation. 100% of respondents agreed with the proposal.

Respondents had the opportunity to add comments at the end of the survey. Out of 5 respondents 3 left comments.

Positive Impacts

All comments mentioned the positive impacts of establishing an SEN Unit. Respondents mentioned the positive impact of creating additional SEN places and reducing travel for autistic pupils and those with communication and interaction needs.

“Other units suitable for children with ASD are further away in the borough which makes a greater distance for children and families who are often concerned about availability of local places.”

“We need more schools where children with SEN can go to school close to home and not have to spend ages in a taxi.”

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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)

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(*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 430 pupils currently on roll at the school. There is not currently a SEN Unit at the school.

Table 1: Number of pupils on roll at Manor Mead School by National Curriculum Year (NCY) Group (January 2022)

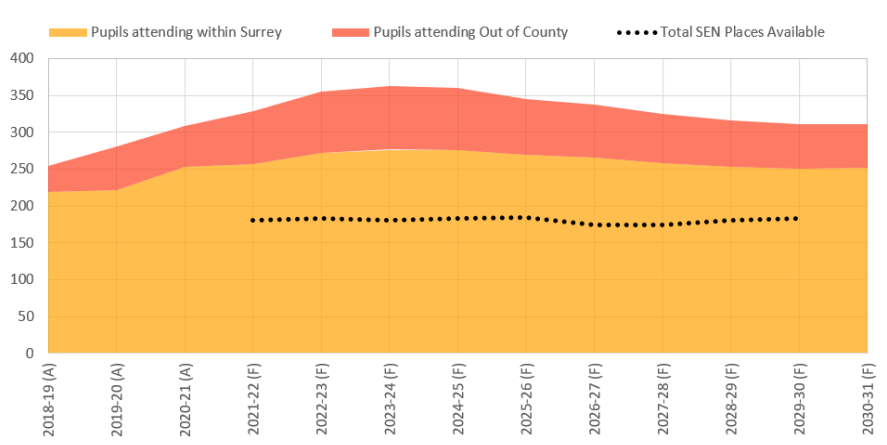
	Nursery	Year R	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Total
Number of pupils currently at Epsom Primary & Nursery	92	53	57	60	54	58	58	90	430

Pupils who may attend the school in the future

The SEN Unit will have 21 places for autistic pupils and those with communication and interaction needs aged between 4-11 years. Places will be accessed through the EHCP process.

Table 2 shows 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 an 11% growth remaining in 2025/26 (345).

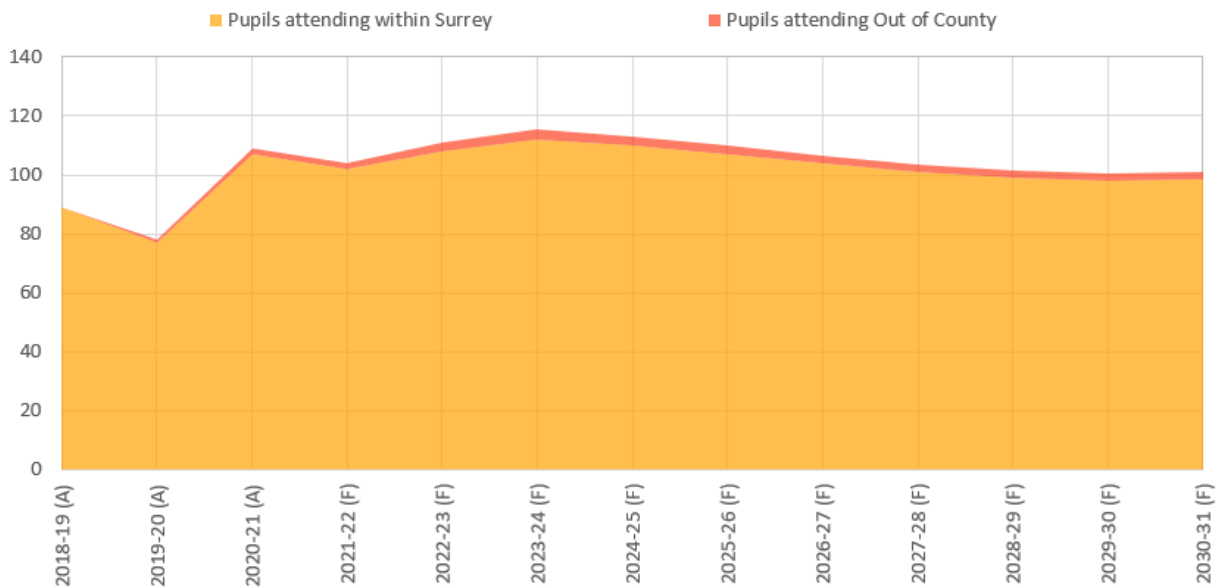
Table 2: North East: Forecast of demand for special school and SEN Unit places from Year R to Year 6 for pupils with an EHCP with a primary need of autism or communication and interaction needs



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Table 3 shows North East projections indicate 6% 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 (109) to the peak in 2023-24 (115) before reducing thereafter. By 2030-31 the number of places needed (101) is projected to be lower than 2020-21 but remains 29% higher than the number of places needed in 2019-20 (78).

Table 3 North East: Forecast of demand for 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



Positive Impacts:

- 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 parents and carers who will have the opportunity to be part of a school community closer to home. The school encourages participation from parents & carers giving them the opportunity to be involved in the school community.

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

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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 Special 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 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.

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 unit?	The SEN Unit will utilise existing rooms within school.
2.	What building work would be needed and what grounds would be lost?	A feasibility study is in progress with scope for some internal changes to repurpose classrooms and re-provide office space elsewhere in the school. The SEN Unit will be part of Epsom Primary School & Nursery so no part of the site or grounds would be lost. The school has had three additional classrooms for a bulge class that is due to leave the school in July 2021.
3.	Will it have an impact on the current teaching space for music lessons? If so, what is the plan for addressing this?	Due to repurposing of the current staff room, music lessons will now take place in a more suitable and larger room which will be dedicated to Art, Music and DT.
4.	How many qualified, experienced SEN teachers and TA's will be recruited to	A Head of Centre will be recruited, alongside an additional class teacher and Teaching Assistants.

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	best meet the additional needs of these children?	The number of Teaching Assistants employed will increase as the numbers grow.
5.	Unstructured time can often be the most challenging for ASD students to feel regulated, safe, happy and have positive interactions with peers and staff. What specific actions will be put in place to integrate these children into the mainstream environment and also vice versa - enabling neurotypical children to gain greater understanding of neurodiversity?	The nature of the staffing and provision means that each child will have their own tailored approach to ensure that interactions and communication with other pupils is managed effectively. Staff from the SEN centre will accompany children to their mainstream class and support strategies that will help them access the teaching successfully at their own pace which may also support others within the classroom. Inclusion is already embedded within the school and pupils will learn even more about the range of ways in which children learn and flourish.
6.	How will the proposed unit impact upon the previously stated goal of EPS to achieve Outstanding status from Ofsted? How much do Ofsted take into account SEN data when they review pupil progress and value-added data to arrive at their judgement?	<p>The DfE guidance Making Significant Changes advises that additional new places should only be provided at schools that have an overall Ofsted rating of “good” or “outstanding”.</p> <p>In proposing a SEN Unit in a mainstream school, the local authority is proposing additional places to support pupils with SEND to improve the standard, quality and/or range of educational provision for those children.</p> <p>When making judgements Ofsted take a range of evidence into account, including official national data; discussions with leaders, staff and pupils; questionnaire responses; and work in pupils’ books/folders/sketchbooks and so on.</p> <p>Paragraph 367 to 371 of the school inspection handbook gives guidance on applying the Education Inspection Framework in special schools and mainstream schools with provision for pupils with SEND. “Because of the often vastly different types of pupils’ needs, inspectors will not compare the outcomes achieved by pupils with SEND with those achieved by other pupils with SEND in the school, locally or nationally”</p>
7.	Is this to support existing pupils at Epsom primary or will places be given externally via panel?	An SEN unit in a mainstream school will bring resource and expertise into the school that will benefit all pupils.

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		<p>All pupils attending the SEN Unit will have been allocated a place through the Education Health and Care Plan (EHCP process). Pupils will be allocated a place at the SEN Unit at Epsom Primary & Nursery by Surrey County Council's SEND Admissions Team. Please see the School Admissions Guidance for children with an EHCP for more information.</p> <p>Pupils attending the SEN unit will split their time mainstream classes and the SEN Unit. The SEN Unit will be part of the school and pupils will be on roll at Epsom Primary & Nursery School.</p>
8.	<p>Will parents of a child with SEN in the mainstream school be able to apply for a place in the unit?</p>	<p>Parents of pupils with an Education Health and Care Plan (EHCP) should follow the admissions guidance for children with an EHCP, which is available on the Surrey County Council website.</p> <p>Pupils will be allocated a place at the SEN Unit at Epsom Primary & Nursery by Surrey County Council's SEND Admissions Team.</p> <p>Parents of pupils with communication & interaction needs identified in their EHCPs who are currently in the mainstream school would not automatically be able to be placed in the SEN Unit. If, following an annual review, a change of placement to a high coin unit is deemed appropriate then providing there is space, and following the admissions criteria, a child from the mainstream may be able to transition to the Unit.</p>
9.	<p>Will this be a base for pupils with Autism (ASD) or Developmental Language Disorder (DLD)?</p>	<p>The SEN Unit will be for autistic pupils and those with social communication and interaction needs as their primary need.</p> <p>Pupils who are placed at the school will have an Education Health and Care Plan (EHCP) that identifies the SEN Unit as the appropriate placement.</p> <p>Pupils with Speech & Language needs identified through the EHCP process will have access to a Speech & Language therapist at the school whether they attend the SEN Unit or are fulltime in mainstream classes.</p>

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<p>10.</p>	<p>Will parents of a child with SEN in the mainstream school be able to apply for a place in the unit?</p>	<p>Parents of pupils with an Education Health and Care Plan (EHCP) should follow the admissions guidance for children with an EHCP, which is available on the Surrey County Council website.</p> <p>Pupils will be allocated a place at the SEN Unit at Epsom Primary & Nursery by Surrey County Council's SEND Admissions Team.</p> <p>Parents of pupils with communication & interaction needs identified in their EHCPs who are currently in the mainstream school would not automatically be able to be placed in the SEN Unit. If, following an annual review, a change of placement to a high coin unit is deemed appropriate then providing there is space, and following the admissions criteria, a child from the mainstream may be able to transition to the Unit.</p>
<p>11.</p>	<p>Will the overall number of pupils in the school increase? How will this be managed?</p>	<p>The SEN Unit pupils will be in addition to the current mainstream PAN and those numbers will be considered in the building feasibility.</p> <p>The school may consider reducing the mainstream PAN in the future, but this would be subject to a separate consultation according to the Schools Admissions Code statutory guidance</p>
<p>12.</p>	<p>How many children will be attending the unit?</p>	<p>The growth model allows us to start small to ensure that we get the provision right for these children. This will mean 12 pupils from KS1 and Reception will start with us in September and then an additional 3 pupils per year will join for the following 3 years to reach the capacity of 21 pupils.</p>
<p>13.</p>	<p>Will the children be in addition to the number already in class? If so, how will this work as some classrooms are small already?</p>	<p>At full capacity there will be 3 pupils in each year group in the SEN Unit.</p> <p>ASD SEN Units in Mainstream Schools support autistic pupils and those with communication and interaction needs whose additional needs are such that they are able to spend approximately 50% of the taught curriculum in mainstream classes with support. The school will organise a timetable for inclusion which ensures all pupils in the school benefit from an inclusive model. The property feasibility will ensure that space is sufficient for meaningful inclusion.</p>

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		Staff from the SEN Unit will be supporting the integration into the mainstream classes along with the children.
14.	The school are converting to an academy and joining The Bourne Education Trust. Will this change impact the SEN Unit?	<p>Epsom Primary & Nursery consulted on their intention to convert to academy status.</p> <p>The creation of a SEN Unit in a mainstream school is a significant change and the decision to approve this proposal will take place before the school converts to an academy.</p> <p>If the proposal to create a SEN Unit at the school is agreed by the Lead Cabinet Member on 26 April 2022 the significant change will be implemented on 1 Sept 2022. The academy conversion would take place at a later date and the school would convert as a mainstream school with an SEN Unit.</p>

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 SEN unit at Epsom Primary & Nursery 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

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Age including younger and older people

The proposal positively impacts pupils aged 4 years to 11 years old who need an ASD school place.

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

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 SEN unit at Epsom Primary & Nursery 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

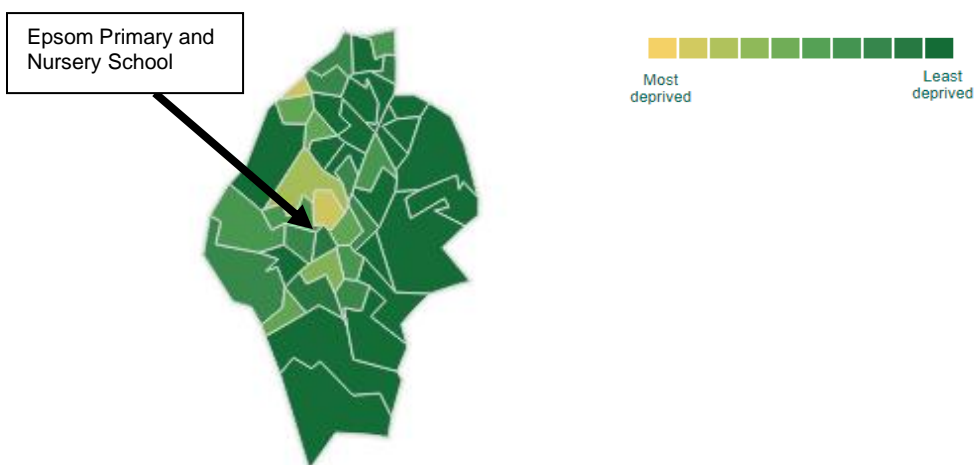
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Socio economic disadvantage

[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 Primary & Nursery School is close to LSOA 007a which is in the 20% - 30% 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?

The development of the proposed SEN Unit at Epsom Primary & Nursery 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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3. Staff

Any impacts for staff with protected characteristics will be considered by the Governing Body of Epsom Primary & Nursery and.

Additional staff would be employed to resource the expansion of Epsom Primary & Nursery School.

Positive impact: Development opportunities for staff with the establishment of an SEN Unit

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 SEN Unit at Epsom Primary & Nursery 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.

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	Jane Keenan	26 January 2022
0.2	Amendments to draft at end of Informal Consultation	Jane Keenan	24 April 2022
1	Final version at the end of the Statutory Notice period	Jane Keenan	1 June 2022

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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	21/06/2022
Executive Director – Rachael Wardell	21/06/2022
Cabinet Member – Denise Turner Stewart	
Directorate Equality Group – Liz Mills	21/06/2022

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
Jackie Drysdale	Commissioning Assistant	SCC	Project Group member
Emilie Williams Jones	Programme Manager, SEND Capital Programme	SCC	Programme Manager
Michelle Pollard	Headteacher	Epsom Primary & Nursery and	Service Expert
Lisa Kent	Chair of Governors	Epsom Primary & Nursery and	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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