

Equality Impact Assessment for the Proposal to expand the existing SEN Unit at Epsom Downs Primary 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

Epsom Downs Primary School is a two-form entry (2FE) primary school in the borough of Reigate and Banstead in Surrey. The school was rated 'Good' by Ofsted in December 2018.

In agreement with the school's Headteacher and Governing Body, Surrey County Council is proposing that Epsom Downs Primary School opens a new ASD-designated SEN Unit with 25 places in total. All pupils placed by Surrey County Council in the SEN Unit will have a diagnosis of Autistic Spectrum Disorder (ASD) and will have an EHCP specifying the specialist provision within the school as an appropriate placement to meet their individual needs.

The proposal will impact:

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

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

- Reigate and Banstead

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
- 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
- Peter Speers, Surrey County Council, Commissioning Manager, Education Place Planning
- Anya Salisbury, Epsom Downs Primary School, Headteacher
- Surrey County Council Capital Programme Board

Consultation Information:

Surrey County Council and Epsom Downs Primary School consulted on the proposal to open a new ASD-designated SEN Unit at Epsom Downs Primary School with 25 places in total.

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 Downs 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 Thursday 15 December to Friday 10 February 2023. 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 14 responses to the consultation. 93% of respondents agreed with the proposal to open the SEN Unit at Epsom Downs Primary School.

A public meeting was held on 12 January 2023 at 6pm.

Statutory Notices were published from 29 March – 10 May 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.

During this period 35 responses were received, of which 80% were in favour of opening the SEN Unit.

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)

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 Special Educational Needs and Disabilities and Adult and Young carers)

Pupils at the school

There are 393 pupils currently on roll at Epsom Downs Primary School (October 2022 School Census)

Table 1: Number of Pupils on roll at Epsom Downs Primary School by National Curriculum Year (NCY) Group

Number of pupils	Year R	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Total
Mainstream school	30	29	30	30	30	30	31	210

(3 spaces in SLCN unit – 1 in Reception, 1 in Year 1, 1 in Year 2 February 2023)

Pupils who may attend the school in the future

The proposal is to open a new ASD-designated SEN Unit at Epsom Downs Primary School with 25 places in total. All pupils placed by Surrey County Council in the SEN Unit will have a diagnosis of Autistic Spectrum Disorder (ASD) and will have an EHCP specifying the specialist provision within the school as an appropriate placement to meet their individual needs.

The specialist unit at Epsom Downs Primary School will cater for children from across South East Surrey with a smaller number likely to come from the North East of the county.

The number of children living in the South East of Surrey with an EHCP in Years R to 6 with a primary need of ASD has increased by 26% since 2018. Latest sufficiency modelling projects growth of 41% by 2025-2026, along with a 13% shortage of specialist unit places within this timescale.

Graph 1 illustrates that the demand for specialist unit places for pupils with a primary need for ASD in Years R-6 will peak in 2024-2025. This is then followed by a forecast small decrease in the number of specialist unit ASD places required by 2030-2031. This follows the county-wide demographic trend as pupils born at the peak in 2012 will be leaving the primary sector.

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Graph 1: Demand for specialist unit places from children in South East Surrey with an EHCP in Years R-6 and a primary need of SLCN

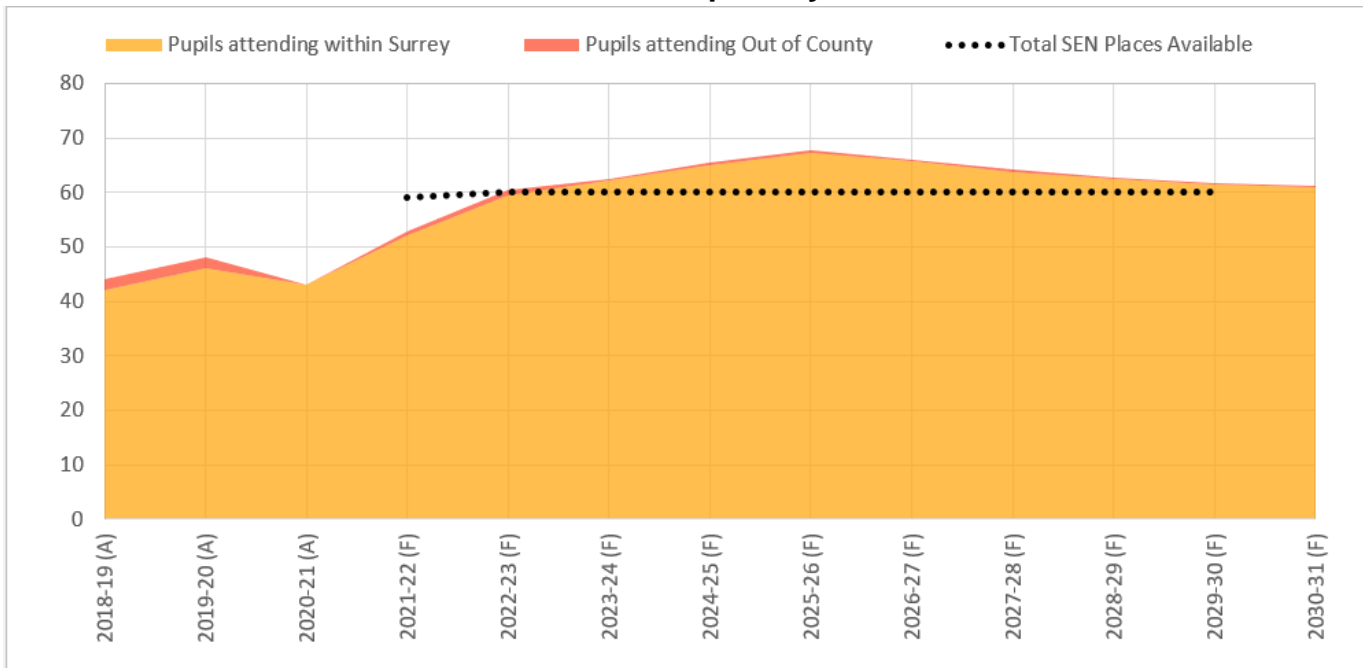


Table 2: NW and NE quadrant residents in Years R-6 who attend specialist units with ASD identified as their primary need and projected demand for additional places in 2025-26 and 2030-31

District or Borough	Actuals 2020-21	Projected demand for places in 2025-2026	Projected growth from 2020-21 to 2025-2026	Projected demand for places in 2030-2031	Projected growth from 2020-21 to 2030-31
South East	43	66	53%	61	42%
North East	51	46	-10%	46	-10%
Rest of Surrey	81	100	23%	102	26%



This data illustrates the projected demand for additional specialist unit places in and across Surrey over the next ten years. The South East of Surrey is forecast to have the highest percentage growth over the forecast period. There is a forecast decrease for specialist places needed in North East Surrey and a smaller demand for specialist ASD unit placements across the rest of Surrey.

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Positive Impacts:

- The new SEN Unit 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 pupils and their families.

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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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 open a new SEN Unit at Epsom Downs Primary 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 with Speech, Language and Communication Needs (SLCN) aged 4 years to 11 years old, who require 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 expansions of the SEN Units at Dovers Green School and St Matthew's Primary School are 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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Socio economic disadvantage

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

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 proposed opening of a new SEN Unit at Epsom Downs Primary 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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3. Staff

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

Positive impact: Development opportunities for staff with the opening of a SEN Unit at Epsom Downs 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 new SEN Unit at Epsom Downs Primary 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	Peter Speers	14 Dec 2022
0.2	Amendments to draft at end of Informal Consultation	Peter Speers	11 Feb 2023
0.3	Final draft at the end of the Statutory Notice period	Peter Speers	11 May 2023
1	Final version for Cabinet Member of Education and Learning Decision Meeting	Peter Speers	19 May 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	
Cabinet Member – Clare Curran	
Directorate Equality Group – Liz Mills	

EIA author: Lauren Comer, Commissioning Manager, Education Place Planning

6c. EIA Team

Name	Job Title	Organisation	Team Role
Peter Speers	Commissioning Manager	SCC	Author, Project Manager
Emilie Williams Jones	Programme Manager, SEND Capital Programme	SCC	Programme Manager
Anya Salisbury	Headteacher	Epsom Downs Primary School	Service Expert
Liz Mills	Director of Education and Learning	SCC	Sponsor

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