

### Equality Impact Assessment for proposals for the provision of primary school places in the planning area of Reigate

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 has published an education consultation about proposed changes to the provision of school places in the primary planning area of Reigate. It is unlikely that any changes would occur before September 2026.

The consultation directly impacts Reigate Priory Junior School as the school cannot remain as a 5FE (5 Form Entry) Junior School on the current site for the long-term:

School	Age-range	Type of School	Feeder relationships
Reigate Priory Junior School	Junior 7 – 11 years old	Community School	Dovers Green Infant School Holmesdale Infant School

The consultation impacts many pupils who attend the school currently and pupils who may attend the school in the future, and their families. It will also impact staff at the school.

Other schools in the primary planning area of Reigate who may be impacted by the outcome of this consultation:

School	Age-range	Type of School	Feeder relationships
Dovers Green Infant School	Infant 4 – 7 years old	Academy Greensand Multi-Academy Trust	Reigate Priory Junior School Sandcross Primary School
Holmesdale Infant School	Infant 4 – 7 years old	Academy Greensand Multi-Academy Trust	Reigate Priory Junior School Sandcross Primary School
Sandcross Primary School	Primary 4 – 11 years old	Academy Everychild Partnership Trust	Dovers Green Infant School Holmesdale Infant School

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Reigate Parish Primary School	Primary 4 – 11 years old	Voluntary Aided Diocese of Southwark	N/A
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The consultation may also indirectly impact schools in neighbouring planning areas.

The current proposed options are:

Option	Summary
1	<p><b>Relocate Reigate Priory Junior School to a new site at Woodhatch Place</b></p> <p>The school would move out of the current building and transfer to a new site at Woodhatch Place, the only available site which met the criteria in a site search completed in August 2023. The site is less than 1 mile, from the current site. This option is subject to the necessary planning permission. Since the move would be to a site less than 2 miles from the current site, there would be no obligation for further consultation on this option, if approved. We currently estimate that if this option is adopted and the necessary permissions are obtained, the new site should be open in September 2026.</p>
2	<p><b>Set up an education working group to explore re-organisation options for schools in the primary planning area of Reigate.</b></p> <p>Surrey County Council would bring together decision makers across all schools in the primary planning area of Reigate to consider whether school places in Reigate could be re-organised. The five schools in the primary planning area of Reigate are Reigate Priory Junior School, Dovers Green Infant School, Holmesdale Infant School, Sandcross Primary School and Reigate Parish Primary School. The working group would need to identify changes that could be made to schools, as Reigate Priory Junior School cannot stay on its current site in its current form without a substantial reduction in numbers. This could include expansions, schools amalgamating and/or changing age ranges to become primary schools, changes in admission arrangements and other reorganisation ideas. It could take six months to a year before agreed proposal(s) are formulated, and they would then be subject to further consultation. We currently estimate that if this option is adopted and the necessary permissions are obtained, the changes could be in place by September 2028.</p> <p>If option 2 is pursued, this could be done in tandem with pursuing the planning application at Woodhatch under option 1. This is because of the uncertainties in making all the changes which may be necessary under option 2 and doing so within a reasonable time frame.</p>

The decision taken by Cabinet will impact:

- Parents and families of pupils currently attending Reigate Priory Junior School or likely to attend the school in the future.
- Staff at Reigate Priory Junior School
- Pupils and their families who wish to attend Reigate Priory Junior School in the future.

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- Current and future pupils and their families of local infant schools that feed into Reigate Priory (Dovers Green School and Holmesdale Infant School)
- Current and future pupils and their families of pupils at Sandcross School and Reigate Parish Primary
- Local residents

The proposal could also impact:

- Parents and families of pupils currently attending other schools in neighbouring primary planning areas, or likely to attend schools in those areas in the future.
- Staff at other schools and Multi Academy Trusts in the neighbouring planning areas of Reigate or neighbouring areas

## 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.

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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
- Carrie Traill, Surrey County Council, Head of Education
- James Painter, Surrey County Council, Programme Director
- Mike Singleton, Surrey County Council, Service Manager, Education Place Planning
- Jane Keenan, Surrey County Council, Commissioning Manager, Education Place Planning
- Kim O'Malley, Surrey County Council, Commissioning Assistant, Education Place Planning
- Oliver Moses, Reigate Priory Junior School, Headteacher
- Pamela Hutchinson, Chair of Governors, Reigate Priory Junior School
- Leadership of all schools in the primary planning area of Reigate

## Consultation Information:

An education consultation was published 27 November to 21 January.

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The consultation analysis is available [here](#) and will be published with the Cabinet papers for 27 February 2024.

## Key points from the consultation responses:

1. 975 people responded to the consultation. 27% of respondents selected option 1, 68% of respondents selected option 2 and 5% selected do not know/no opinion.
2. There were three free text questions to allow respondents to share their views on each option. The comments were manually thematically coded by officers.
3. The theme with the highest prevalence for option 1 was negative impact on traffic in the area (391 comments). This was followed by concerns regarding safety of travel to school (329 comments) and negative impact due to increased distance from Holmesdale Community Infant School (203 comments).
4. The theme with the highest prevalence for option 2 was a desire for solutions on the current site (298 comments), followed by re-organising to primary schools (rather than infant and junior) (158 comments) and a need to consider other sites (91 comments).
5. Respondents were asked if they had any further comments. The theme with the highest prevalence was distrust in Surrey County Council (118 comments), respondents mentioned thinking that Surrey County Council had an agenda for Reigate Priory Junior School to move to Woodhatch Place and not trusting that there is not a solution on site or another site available. Annex 1 aims to address the potential on the current site at Priory Park and paragraphs 7 – 10 of this document outline the site search.

## Who responded to the consultation?

	<b>Total response s</b>	<b>Option 1</b>	<b>Option 2</b>	<b>Don't Know</b>
A governor at one of the schools	11	64%	36%	0%
A parent/carer of a child at another school	125	36%	61%	3%
A parent/carer of a child at Dovers Green	67	96%	4%	0%
A parent/carer of a child at Holmesdale Infant	98	5%	92%	3%
A parent/carer of a child at Reigate Priory Junior School	216	19%	77%	4%
A parent/carer of a child who may attend a local school in the future	90	31%	62%	7%
A resident in the local area	302	15%	80%	5%
A staff member at one of the schools or local primary school nearby	35	71%	20%	9%
Other	30	23%	63%	13%
<b>Total</b>	<b>975</b>	<b>68%</b>	<b>27%</b>	<b>5%</b>

## Understanding parent's views

6. There were 216 responses from parent/carers of a child at Reigate Priory Junior School (this includes those who also have a child at one of the infant schools or another school). The majority (77%) selected option 2 as a preferred option. Of the 216 almost half (100) left comments under option 2 that they wanted a solution on site with a small number of the 102 also mentioning another site (10) or to re-organise to primary (16). 31 of the 216 respondents left positive comments on re-organising to primary and 20 wanted to consider sites other than Woodhatch Place for the school. The 19% (40) who selected option 1 commented on a positive future for Reigate Priory Junior School, positive impacts if travel and transport could be improved, benefits of a new bespoke building and positive impacts for children.
7. There were 98 responses from parent/carers of child at Holmesdale Infant School (not including those who also have a child at RPJS). The majority (96%) selected option 2 as a preferred option. Of the 98, almost half (46) left comments under option 2 that they wanted a solution on site with a small number of the 46 also mentioning another site (6) or to re-organise to primary (12). 23 of the 98 respondents left positive comments on re-organising to primary and 12 wanted to consider sites other than Woodhatch Place for RPJS.
8. There were 67 responses from parent/carers of a child at Dovers Green Infant (not including those who also have a child at RPJS). The majority (96%) selected option 1 and left positive comments about re-locating Reigate Priory Junior School to Woodhatch Place.

# Equality Impact Assessment

## 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

Surrey County Council recognises that there are other vulnerable groups who are or may not all be protected by the Equality Act 2010, which significantly contribute to inequality across the county and therefore impacts on them they should also be considered within alongside the EIAs (Equalities Impact Assessment)

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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 including children with additional needs and disabilities** and **those experiencing socioeconomic disadvantage**.

# Equality Impact Assessment

## Disability

(Including Children with Special Educational Needs and Disabilities and adult and young carers).

### Pupils at the school

There are 554 pupils currently on roll at Reigate Priory Junior School as of the October census 2023.

#### Number of Pupils on roll at Reigate Priory Junior School by National Curriculum Year (NCY) Group October 2023

	Year 3	Year 4	Year 5	Year 6	Total
Number of pupils currently at Reigate Priory Junior School	128	141	140	145	554

Approximately 10 pupils have an Education Health and Care Plan and 74 pupils receive SEN (Special Educational Needs) support at Reigate Priory Junior School.

### Pupils who may attend the school in the future

Less than 5 pupils have an Education Health and Care Plan and less than 10 pupils receive SEN support at Holmesdale Infant School.

Dovers Green Infant School is a mainstream infant school with an SEN Unit for autistic pupils and those with communication and interaction needs. 22 pupils have an Education Health and Care Plan and 43 pupils receive SEN support at Dovers Green Infant School.

Pupils attending the SEN Unit who need a SEN Unit provision in Year 3 usually move to the SEN Unit at St Matthews School, Redhill. Pupils may also move on to mainstream or specialist provision identified at key stage transfer as part of the EHCP (Education, Health and Care Plans) process.

# Equality Impact Assessment

	Positive Impacts	Negative Impacts
Option 1 Relocate Reigate Priory Junior School onto a new site at Woodhatch Place.	<p>Modern building accessible for pupils with physical and sensory needs</p> <p>More accessible for autistic pupils (including pupils who have attended Dovers Green Infant School and need a mainstream school place in Year 3)</p> <p>Opportunity to look at further developments in accessibility and inclusion across the area</p> <p>Impacts for young carers if distance to travel to school is reduced. (Both as a pupil or an elder sibling with responsibility of supporting school drop-off/pick up)</p>	<p>Impacts of change if the new site is further distance to travel. Change can be particularly challenging for autistic pupils and those with communication and interaction needs.</p> <p>Impacts for young carers if distance is further to travel to school. (Both as a pupil or an elder sibling with responsibility of supporting school drop-off/pick up)</p>
Option 2 No immediate change but explore re-organisation options in the primary planning area of Reigate.	<p>Opportunity to look at accessibility and inclusion across the area.</p> <p>Opportunities for further engagement with children and young people and their families.</p>	<p>Delay in more accessible places for pupils in the area.</p> <p>Impacts of change if changes are made across a number of schools.</p> <p>The changes are not yet known and will need to continue to be assessed. Change can be particularly challenging for autistic pupils and those with communication and interaction needs.</p>

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

Transition plans for pupils with additional needs in both options particularly for autistic pupils who made need extra support to manage change.

# Equality Impact Assessment

**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 Department for Education Regional Director approved the significant change to expand the SEN Unit at Dovers Green Infant School at [Advisory Board](#) in April 2024, from 16 places to 24 places for 4 – 7 year olds. The project is within phase 4 of the SEND (Special Educational Needs) Capital Programme.

[202303\\_SEND Capital Programme 2023-24 Delivery Tranche Part 1 FINAL.pdf \(surreycc.gov.uk\)](#)

## **Any negative impacts that cannot be mitigated?**

Within option 2 the changes are not yet known. Any proposed changes would be subject to further consultation and decision making as per the statutory process, with an updated Equality Impact Assessment.

# Equality Impact Assessment

## Age including younger and older people.

The proposal impacts pupils aged 7 to 11 years old a mainstream school.

	Positive Impacts	Negative Impacts
<b>Option 1 Relocate Reigate Priory Junior School onto a new site at Woodhatch Place.</b>	<p>Sustainability of junior places to match the number of infant places.</p> <p>Pupils living in south Reigate age 7 – 11 may have a shorter journey to school.</p> <p>A new site creating sustainable places could enable opportunities for further partnership between infant and junior schools or re-organisation in the future.</p>	<p>Pupils living in north Reigate age 7 – 11 may have to travel further to school.</p>
<b>Option 2 No immediate change but explore re-organisation options in the primary planning area of Reigate.</b>	<p>Opportunity to look at accessibility and inclusion across the area.</p> <p>Opportunity to look at all options in the future.</p> <p>Opportunities for further engagement with children and young people and their families.</p>	<p>Delay could be a risk to places for 7 – 11 year olds in the future.</p> <p>The changes are not yet known and will need to continue to be assessed.</p>

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

Mitigations will be followed up further depending on the option taken forward. Transport and travel considerations needed for both options.

### 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?

### Any negative impacts that cannot be mitigated?

Within Option 2 the changes are not yet known. Any proposed changes would be subject to further consultation and decision making as per the statutory process, with an updated Equality Impact Assessment.

## Sex and Pregnancy and Maternity

Women may be more impacted by changes to school drop off and pick up than men as women may take on more caring responsibilities than men.

# Equality Impact Assessment

Parent/carers of pupils at any of the schools impacted may be pregnant at the time changes are made.

	Positive Impacts	Negative Impacts
Option 1 Relocate Reigate Priory Junior School onto a new site at Woodhatch Place.	The new site may be a shorter distance for some families.	Impacts if the new site is further distance to travel. There were responses to the consultation from women who advised they may need to change work arrangements.
Option 2 No immediate change but explore re-organisation options in the primary planning area of Reigate.	New arrangements may make drop off and pick up easier for parent/carers.	New arrangements may make drop off and pick up more challenging for parent/carers.

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

Mitigations will be followed up further depending on the option taken forward. Transport and travel considerations needed for both options. Pregnancy/maternity could be considered if an additional criteria for transport is added outside of the transport policy.

**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?**

**Any negative impacts that cannot be mitigated?**

Within option 2 the changes are not yet known. Any proposed changes would be subject to further consultation and decision making as per the statutory process, with an updated Equality Impact Assessment.

# Equality Impact Assessment

## Socio economic disadvantage

### Who is impacted?

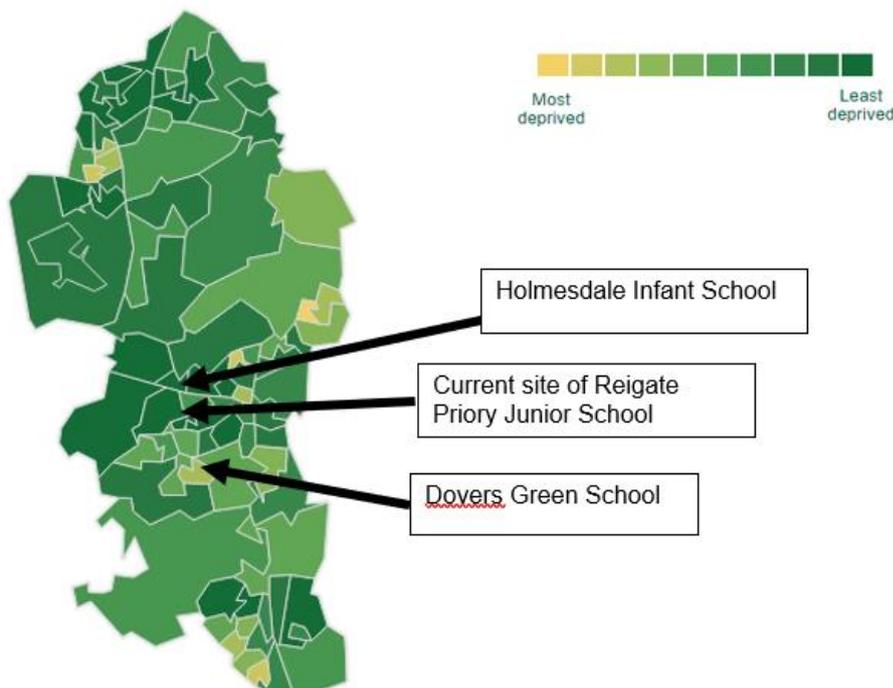
- Approximately 80 (14%) out of 554 pupils on roll at Reigate Priory Junior School are eligible for free school meals.
- Less than (3%) 10 out of 291 pupils on roll at Holmesdale Infant School are eligible for free school meals.
- Approximately 40 (15%) out of 265 pupils on roll at Dovers Green Infant School are eligible for free school meals.
- Approximately 135 (21%) out of 658 pupils on roll at Sandcross Primary School are eligible for free school meals.
- Approximately 22 (5%) out of 419 pupils on roll at Reigate Parish Church Primary School are eligible for free school meals.

[The Indices of deprivation 2019](#) finds that 4 out of 86 Lower Layer Super Output Areas (LSOA) in Reigate and Banstead are between 10%-30% least privileged in the country. Only 15 out of 86 areas are less privileged than 50% of England. 22 out of 86 LSOAs in Reigate and Banstead are in the most privileged 10% in the country.

Reigate Priory Junior School's current site is situated in LSOA 012D, in most privileged 10% in the country. Woodhatch Place, the proposed new site for the Reigate Priory School sits in LSOA 013A which is in the 50-60% range of deprivation in the country. Dovers Green is situated in LSOA 015E which is in the 30-40% least privileged areas in the country. Holmesdale Infants is in LSOA 009F, in the most privileged 10% of the country.

Figure 1: English Index of Multiple Deprivation Reigate and Banstead

Map of Reigate and Banstead



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

# Equality Impact Assessment

	<b>Positive Impacts</b>	<b>Negative Impacts</b>
<b>Option 1 Relocate Reigate Priory Junior School onto a new site at Woodhatch Place.</b>	<p>Pupils living in south Reigate where socio disadvantage is higher may have a shorter journey to school for junior places.</p> <p>Approx 40 pupils at Dovers Green Infant are eligible for free school meals. Around 80% of those live closer to the proposed school site at Woodhatch than the current site for Reigate Priory Junior School.</p> <p>Around 80 pupils at Reigate Priory Junior School are eligible for free school meals. Around 55% of those live closer to the proposed school site at Woodhatch than the current site for Reigate Priory Junior School than.</p>	<p>Transport options needed for any pupils that may have barriers to access transport due to deprivation.</p> <p>Less than 10 pupils at Holmesdale Infant are eligible for free school meals. Around 80% of those live closer to the current site for Reigate Priory Junior School than the proposed school site at Woodhatch.</p> <p>Data from schools census January 2023 showed 45% of pupils eligible for free school meals could have further to travel to school.</p>
<b>Option 2 No immediate change but explore re-organisation options in the primary planning area of Reigate.</b>	<p>Opportunity to look at all options in the future.</p> <p>Opportunities for further engagement with children and young people and their families.</p>	<p>The changes are not yet known and will need to continue to be assessed.</p> <p>Risk that pupils from more disadvantaged areas may have to travel further to school.</p>

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

Mitigations will be followed up further depending on the option taken forward. Transport and travel considerations needed for both options.

**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?**

**Any negative impacts that cannot be mitigated?**

Within Option 2 the changes are not yet known. Any proposed changes would be subject to further consultation and decision making as per the statutory process, with an updated Equality Impact Assessment.

# Equality Impact Assessment

## 3. Staff

Staff at the five schools across the planning area of Reigate could be impacted by the decisions made. Mitigations may be needed for staff who are pregnant or on maternity leave and/or staff with additional needs or disability. Further consideration of the impact for staff from all protected groups must be considered in any changes.

Some of the impacts to be considered are listed in the table below:

	<b>Positive Impacts</b>	<b>Negative Impacts</b>
<b>Option 1 Relocate Reigate Priory Junior School onto a new site at Woodhatch Place.</b>	Some staff may have a shorter distance to travel to work. Improved accessibility in a modern building.	Some staff may have further to travel to work.
<b>Option 2 No immediate change but explore re-organisation options in the primary planning area of Reigate.</b>	Opportunity to look at all options in the future.  Opportunities for improved accessibility in a modern building.	The changes are not yet known and will need to continue to be assessed.  Risk that more staff could be impacted if changes to multiple schools.  Changes for staff could include change to work location, potential change to role if changing age range of a school. There is no proposal for closure at this stage.

**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?**

**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 Two: Adjust the policy/service/function

- Pursue option 2 within a specified timescale.
- Pursue planning for option 1 in order to understand viability and mitigate impact of further delay. Consider if potential transport options in addition to what is covered by the transport policy are needed to mitigate any negative impacts.
- Continue to assess impacts as proposals are evaluated.

### Explanation:

- There are positive and negative impacts for both options.
- Whilst there is no option for there to be no change the recommended next steps aim to keep all options open to mitigate negative impacts of taking time to pursue option 2.
- Pursuing option 2 whilst continuing to apply for planning permission for option 1 keeps the maximum flexibility and equalities impacts can be considered further as we move forward.

## 5. Action plan and monitoring arrangement

Action	Review
Decision on recommendations	Cabinet decision 27 February 2024
Plan for continued assessment by the working group within the working group terms of reference (dependent on decision on 27 February 2024).	March 2024

## Version control

Version Number	Purpose/Change	Author	Date
0.1	Draft	Kim O'Malley	24/05/2023
0.2	Draft updates	Jane Keenan	04/09/2023
0.3	Amendments to draft once consultation options agreed	Jane Keenan	27/11/2023
0.4	Amendments to draft at end of consultation	Jane Keenan	31/01/2024
0.5	Final draft	Jane Keenan	8/02/2024
1	Final version for Cabinet Decision Meeting	Jane Keenan	14/02/2024

# Equality Impact Assessment

## 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	5 Feb 2024
Executive Director – Rachael Wardell	5 Feb 2024
Cabinet Member – Clare Curran	5 Feb 2024
Directorate Equality Group	4 January 2024

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

## 6c. EIA Team

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Name	Job Title	Organisation	Team Role
Jane Keenan	Commissioning Manager	SCC	Author, Project Manager
James Painter	Programme Director	SCC	Programme Manager
Kim O'Malley	Commissioning Assistant	SCC	Project Group member
Mike Singleton	Service Manager	SCC	Service Manager
Oliver Moses	Headteacher	Reigate Priory Junior School	Service Expert
Liz Mills	Director of Education and Learning	SCC	Sponsor

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