

Equality Impact Analysis (EqIA)

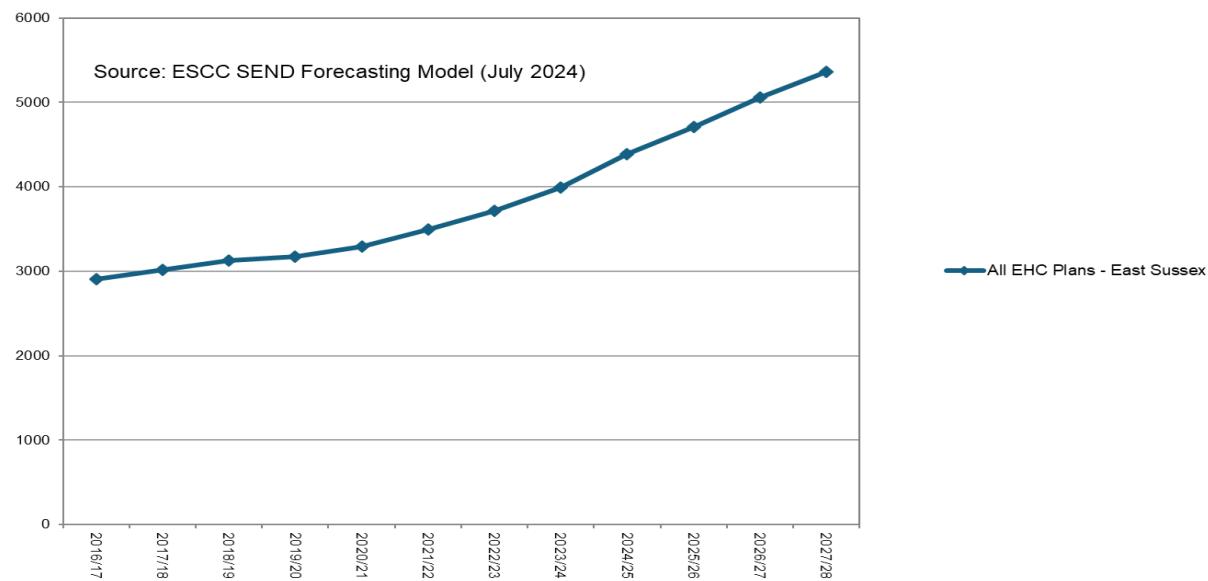
Title of Project/Service/Policy	Proposed Reorganisation and Enlargement of Grove Park School
Team/Department	Education Division
Directorate	Children's Services
Provide a comprehensive description of your Project (Service/Policy, etc.) including its Purpose and Scope	<p>Background</p> <p>Grove Park School, Crowborough, is a maintained special school for pupils aged 4-19 located in the Wealden area. There are 13 state special schools in East Sussex. Grove Park School is the only special school in the north of the county, and the only maintained special school in the county.</p> <p>Grove Park School currently comprises three phases: primary, secondary and sixth form, located on separate sites in Crowborough. The primary phase (4-11) is based at Church Road, the secondary phase (11-16) is co-located on the Beacon Academy secondary site in Beeches Road and the sixth form (post-16) is co-located with Beacon Academy's sixth form at Green Lane. The school's provision meets the needs of learners with complex needs including those with Profound and Multiple Learning Difficulties (PMLD), Severe Learning Difficulties (SLD), Autistic Spectrum Disorders (ASD) and Sensory Needs. At the October 2024 School Census, the school had 146 pupils on roll.</p> <p>The local authority has a statutory duty to identify, assess and provide for children and young people with special educational needs. An assessment may lead to the issuing of an Education, Health, and Care Plan (EHCP) for a child. An EHCP sets out the additional support a child or young person needs and the type of school (mainstream or special) or other provision they will attend in order to meet their needs.</p> <p>The overall numbers of children and young people aged 4 to 25 with an EHCP in East Sussex has been rising steeply. In 2023/24, the number of school aged children (aged 4-18) in East Sussex with an EHCP stood at 3,989. Over the next four years, the local authority forecasts that overall numbers of school aged children with EHCPs will grow, by around 34%, to stand at approximately 5,400.</p>



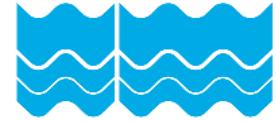
Table 1: Overall numbers of school aged children with EHCPs

Academic year	EHCPs
2016/17	2909
2017/18	3022
2018/19	3126
2019/20	3170
2020/21	3297
2021/22	3494
2022/23	3713
2023/24	3989
2024/25	4385
2025/26	4713
2026/27	5059
2027/28	5360

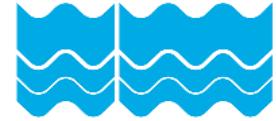
Source: ESCC SEND Forecasting Model (July 2024)



The number of children and young people identified as autistic is growing year on year and is translating into rapidly increasing numbers of EHCPs issued with a primary need classification of 'Autistic Spectrum'



	<p>Disorder (ASD)'. There are no signs of this trend reducing, and autism diagnoses look like being the biggest driver of rising EHCP numbers in the coming years.</p> <p>Linked to the rise in pupils with EHCPs, pupil numbers have increased significantly at Grove Park School. At the request of the local authority, the school has taken pupils with a broader range of need than PMLD, including pupils with ASD and SLD. As a result, pupil numbers at the school have grown from 100 in 2012/13 to 133 in 2022/23 and 146 in 2024/25, an overall increase of 46%. As the only special school in the north of the county, there will continue to be significant pressure on places at the school for PMLD places as well as the other needs the school caters for, including ASD and SLD.</p> <p>Local authorities have a statutory duty to ensure there are sufficient school places for all pupils, including for those with special educational needs and disabilities (SEND). As illustrated in Table 1, the local authority's SEND forecasts provide clear evidence that we will continue to see an increase in the number of pupils with SEND in the coming years. As a result, the Local Authority is proposing to reorganise Grove Park School and enlarge its Church Road premises to meet the growing demand for places by:</p> <ol style="list-style-type: none">1. lowering the school's age range from 4-19 to 2-19 to establish nursery provision for eight full-time equivalent (fte) two- and three-year-olds, and2. relocating the secondary phase to Grove Park School's Church Road premises to accommodate additional pupils by building a new block on the site, thereby partially ending the school's current co-location arrangement with Beacon Academy. <p>This is a slight change to the proposal consulted on in 2023. It was originally proposed to enlarge the premises at Church Road to also accommodate an enlarged sixth form. The sixth form is co-located at Beacon Academy's Green Lane site. However, due to budgetary constraints and challenging site conditions at the Church Road site it has been necessary for the local authority to reduce the scope of the proposed project. As a result, under the amended proposals Grove Park School sixth form pupils would continue to be co-located at Beacon Academy.</p> <p>Who is affected by the Proposal?</p> <p><u>Children and their families</u></p>
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The proposal would affect pupils on roll at Grove Park School and their families. Table 2 shows the number of pupils on roll at the school at the October 2024 School Census compared to special schools in Wealden and East Sussex as a whole.

Table 2: Pupils on roll in special schools, October 2024

School	Primary							Secondary							Total	
	Year							Year								
	R	1	2	3	4	5	6	7	8	9	10	11	12	13	14	
Grove Park School	10	11	7	11	9	6	5	8	17	12	14	14	10	7	5	146
Special schools in Wealden	10	11	7	13	19	18	19	31	39	34	52	57	10	7	5	332
Special schools in East Sussex (exc. PRU)	74	84	76	75	89	88	90	157	177	180	166	162	41	31	22	1,512

Source: October 2024 school census

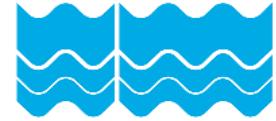
At the October 2024 school census there were 51 female and 95 male children on roll at the school as set out in Table 3.

Table 3: Gender of children attending special schools, October 2024

School type	Gender	Primary	Secondary	Total	%
Grove Park School	Female	14	37	51	34.9%
	Male	45	50	95	65.1%
Special schools in Wealden	Female	23	59	82	24.7%
	Male	74	176	250	75.3%
Special schools in East Sussex (exc. PRU)	Female	149	244	393	26.0%
	Male	427	692	1,119	74.0%

Source: October 2024 school census

The data above shows that in October 2024 females attending Grove Park School were significantly under-represented compared to males who are over-represented. This is in line with the picture in special schools in Wealden and in East Sussex as a whole.



The local authority does not believe that any one gender would be more affected by the proposal than the other as Grove Park School is co-educational.

At the January 2024 school census, the number of minority ethnic children on roll in special schools was as follows:

Table 3: Minority ethnic children in special schools

School type	Primary	Secondary	Total	%
Grove Park School	10	18	28	19.5%
Special schools in Wealden	11	30	41	13.4%
Special schools in East Sussex (exc. PRU)	87	116	203	14.1%

Source: January 2024 school census

The data above shows that minority ethnic children at Grove Park School are over-represented in comparison to the Wealden and East Sussex averages. The local authority does not believe that minority ethnic children would be more affected by the proposal than those in the general population who do not share that protected characteristic as the proposal would benefit all children attending the school.

SEN Pupils including those with an EHCP

As Grove Park School is a special school, all pupils on roll (100%) have an EHCP.

In 2023/24, there were 1,873 East Sussex resident children and young people on roll in special schools. 1,645 were in schools in East Sussex and 228 were in schools in other authorities. 1,453 were in maintained and academy provision and 420 were in non-maintained independent special schools. A further 233 East Sussex resident children and young people were in specialist facilities in mainstream schools.

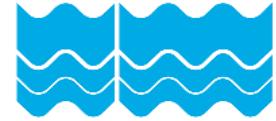
The table below shows that since 2020/21, the biggest need has been for places in maintained special schools and academies followed by funded places in mainstream schools.

Key to table:

Band A: Mainstream School and Further Education Colleges (with a Non-Funded Plan)

Band B: Mainstream School and Further Education Colleges (with a Funded Plan)

Band C: Mainstream School Units and Special Facilities

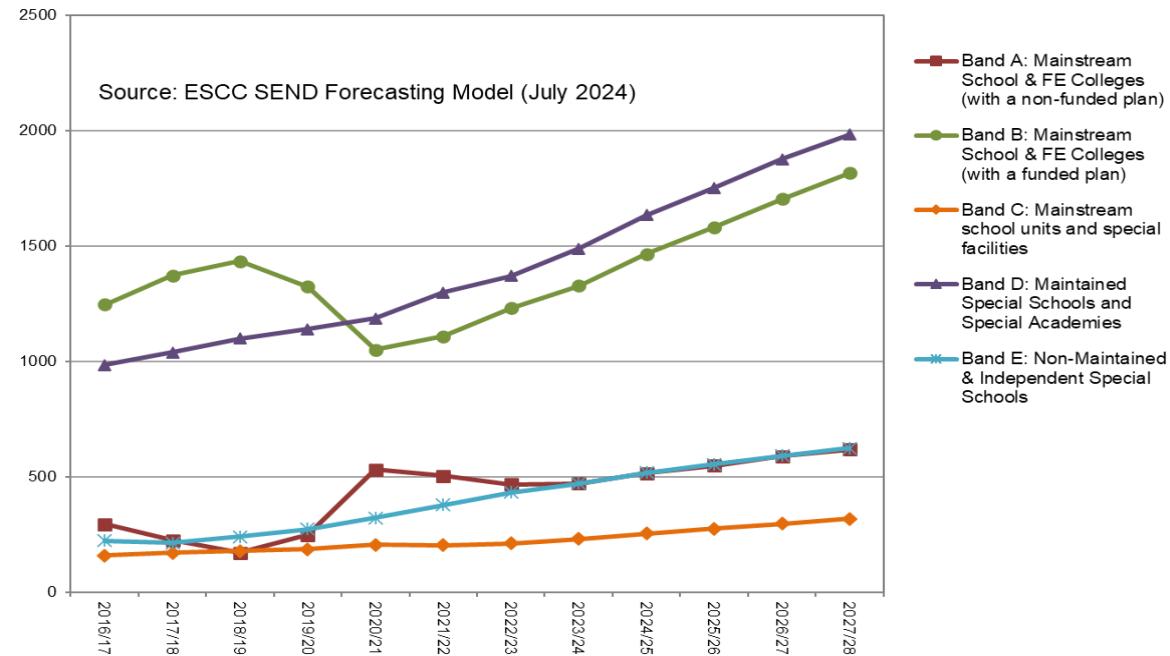
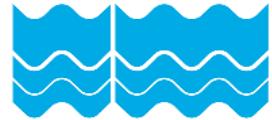


Band D: Maintained Special Schools and Special Academies
Band E: Non-Maintained and Independent Special Schools

EHCPS by Type of Provision Needed

Need	2016/ 17	2017/ 18	2018/ 19	2019/ 20	2020/ 21	2021/ 22	2022/ 23	2023/ 24	2024/ 25	2025/ 26	2026/ 27	2027/ 28
Band A	294	226	171	248	532	505	468	472	515	550	589	619
Band B	1246	1373	1435	1323	1051	1108	1230	1327	1465	1581	1704	1816
Band C	160	170	179	187	206	204	211	230	254	276	297	318
Band D	985	1039	1100	1139	1186	1298	1371	1488	1633	1753	1877	1983
Band E	224	214	241	273	322	379	433	472	517	554	591	624
Total	2909	3022	3126	3170	3297	3494	3713	3989	4385	4713	5059	5360

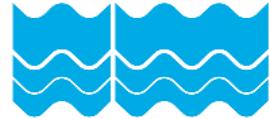
Source: ESCC SEND Forecasting Model (July 2024)



The numbers assessed as requiring a special school place have risen by approximately 550 (39%) over the past four years. The number assessed as requiring maintained/academy special school places has risen by approximately 350 (31%). The number of pupils requiring non-maintained independent special school places has risen by approximately 200, a 73% increase.

The following table compares the combined capacity of places in special schools and specialist facilities in mainstream schools with the current and forecast need for such places. The local authority does not have data on places in independent special schools. In reality, most of the current shortfall in places shown in the table is being met by independent special school placements.

Need for Special School Places from 2022/23 to 2027/28



		Capacity of places 2023/24*	Need 2022/23	Need 2023/24	Need 2024/25	Need 2025/26	Need 2026/27	Need 2027/28	
Number of EHCPs		1843	1843	2015	2190	2405	2583	2766	2925

Source: ESCC SEND Forecasting Model (July 2024)

*Capacity totals exclude places in Independent Special Schools

Source: ESCC SEND Forecasting Model (July 2024)

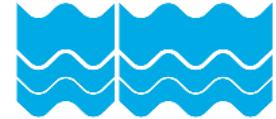
Note: Capacity totals exclude places in Independent Special Schools

Academic Year	Capacity	Need for Places in Special Schools & Special Units/Facilities in Mainstream Schools
2022/23	1843	2015
2023/24	1843	2190
2024/25	1843	2405
2025/26	1843	2583
2026/27	1843	2766
2027/28	1843	2925

The local authority has to use high cost independent and non-maintained special school provision to meet need for specialist placements. This is because there is insufficient capacity in state run provision. If current placement trends continue over the period to 2027/28, the effective shortfall in state run specialist provision is forecast to increase by over 700 places.

Figures for 2023/24 show that 2.2% of all pupils in state-funded schools in East Sussex are in special schools. This compares to the national average for England of 1.9%. (Schools, Pupils and Their Characteristics, Department for Education, 2024).

Impact on Staff



	<p>Some Grove Park School staff currently located at Beacon Academy would be required to relocate to the Church Road premises, a distance of 0.8 miles by road. The proposed changes would lead to better utilisation and deployment of staff and may present opportunities for staff for more professional development.</p> <p>Benefits of the proposal</p> <p>The local authority believes bringing Grove Park School's primary and secondary phases together on one site, and adding nursery provision, would have several benefits for the pupils attending the school:</p> <ul style="list-style-type: none">• The increasing pupil numbers at Grove Park School and Beacon Academy has meant that the intended integration of both sets of pupils is no longer practical.• Pupils attending the secondary provision have limited access to shared spaces, such as the sports facilities and specialist rooms. A single site for primary and secondary pupils at Grove Park School would afford ownership of those facilities and the flexibility to timetable spaces with the needs of the pupils at the centre of the decision making.• The school's budget can be used more effectively as some services could be centralised, for example, one reception area at Church Road for primary and secondary. Teaching, administration, and site staff would work across two sites rather than three, leading to better utilisation and deployment of staff.• Currently, the ability to share learning resources is limited, for example, the school has three PE storage areas with similar resources, which on two sites, could more easily be shared, leading to better utilisation of learning resources.• For regular visitors, for example therapists, being able to visit two sites would reduce travel time and increase the access to therapy for those pupils that need it.• Bringing the primary and secondary phases together on one site would give pupils and their families a sense of community, belonging and identity. <p>Consultation</p> <p>The local authority undertook a consultation on the proposals between 19 May and 23 June 2024 and published a statutory proposal between 10 January 2025 and 6 February 2025. From the comments received during the consultation and representation period following publication of the statutory proposal, there was a recognition of the need for more places in the area and the benefits of bringing the school</p>
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	<p>together on one site. Concerns were raised about the capacity of the Church Road site to accommodate an all-through school, the impact on parking and drop-off/pick up arrangements, and the potential impact on pupils of noise and disruption during a build project. The detailed design process has carefully considered the positioning of the proposed new teaching block to limit its impact on the Church Road site and to address any potential impacts on traffic and parking. These issues will be considered by the Local Authority's Planning Committee in determining the planning application for the new block. The building works would be planned carefully, and contractors would work closely with the school to ensure that works are scheduled to keep noise and disruption to a minimum. The building site would be a secure area to ensure the health and safety of the children, young people, staff, parents/carers and visitors to the school.</p>
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Update on previous EqIAs and outcomes of previous actions (if applicable)

What actions did you plan last time? (List them from the previous EqIA)	What improved as a result? What outcomes have these actions achieved?	What <u>further</u> actions do you need to take? (add these to the Action Plan below)
Not applicable		

1. Review of information, equality analysis and potential actions

Consider the actual or potential impact of your project (service, or policy) against each of the equality characteristics.

Protected characteristics groups under the Equality Act 2010	What do you know? Summary of data about your service-users and/or staff	What do people tell you? Summary of service-user and/or staff feedback	What does this mean? Impacts identified from data and feedback (actual and potential)	What can you do? All potential actions to:
Age	Across Grove Park School education provision is currently provided for pupils aged 4-19. The proposal not only allows for continuation of provision for that age range but would also extend it to ages 2-19 by lowering the age range.	65% of respondents provided their age which was between 35 and 75. Of those that provided their age, 85% supported the proposal to lower the age range of the new school to provide nursery provision and 15% either did not support the proposal or were undecided. 77% supported the proposal to enlarge the premises at the Church Road site and 23% either did not support the proposal or were undecided.	No age-related barriers were identified by respondents.	<ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations <p>The proposal will have a positive impact on children and young people at the school. Making appropriate local provision available is positive for children and young people and supports the local authority's vision to ensure children and young people with SEND can access the help and support they need to thrive and achieve within their local communities.</p> <p>Bringing pupils together on one site would give them and their families a sense of community, belonging and identity.</p>



Protected characteristics groups under the Equality Act 2010	What do you know? Summary of data about your service-users and/or staff	What do people tell you? Summary of service-user and/or staff feedback	What does this mean? Impacts identified from data and feedback (actual and potential)	What can you do? All potential actions to:
Disability	Grove Park School is a special school. All pupils attending the school (100%) have an EHCP.	5% of respondents stated they have a physical or mental health condition or illness lasting or expected to last 12 months or more. Of those 100% supported the proposals to lower Grove Park School's age range and enlarge the premises at the Church Road site	No impacts were identified	The proposal to lower Grove Park School's age range and enlarge the premises at the Church Road site will have a positive impact on children and young people with SEN as special school places will be available locally to meet their educational needs.
Gender reassignment	The local authority does not believe that children and young people sharing this characteristic would be more affected by the proposal than children and young people who do not share this characteristic	Not applicable	Not applicable	No specific action identified at this stage.
Pregnancy and maternity	The local authority does not believe that people sharing this characteristic would be	Not applicable	Not applicable	No specific action identified at this stage.



Protected characteristics groups under the Equality Act 2010	What do you know? Summary of data about your service-users and/or staff	What do people tell you? Summary of service-user and/or staff feedback	What does this mean? Impacts identified from data and feedback (actual and potential)	What can you do? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
	more affected by the proposal than people who do not share this characteristic.			
Race (ethnicity) Including migrants, refugees and asylum seekers	Data on the number of ethnic minority children attending Grove Park School is noted above.	No respondents indicated they were from an ethnic minority group.	No race related barriers were identified by respondents.	The local authority does not believe that people sharing this characteristic would be more affected by the proposal than people who do not share this characteristic.
Religion or belief	Grove Park School is a community school. There would be no change to the school's category as a result of the proposal.	30% of respondents stated they have a religion or belief. Of those, 100% supported the proposal to lower Grove Park School's age range. 83% supported the proposal to enlarge the premises at the Church Road site and 17% did	No impacts relating to religion or belief were identified by respondents	The local authority does not believe that people sharing this characteristic would be more affected by the proposal than people who do not share this characteristic.



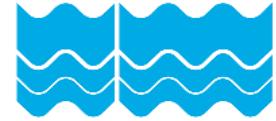
Protected characteristics groups under the Equality Act 2010	What do you know? Summary of data about your service-users and/or staff	What do people tell you? Summary of service-user and/or staff feedback	What does this mean? Impacts identified from data and feedback (actual and potential)	What can you do? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
		not support the proposal.		
Sex	Data on the prevalence of male to female pupils at Grove Park School is noted above.	<p>Of the respondents who indicated they were female, 92% supported the proposal to lower Grove Park School's age range and 8% did not support the proposal.</p> <p>83% of the female respondents supported the proposal to enlarge the premises at the Church Road site and 17% did not support the proposal.</p> <p>Of the respondents who indicated they were male, 67% supported the proposal to lower Grove Park School's age range and enlarge the premises</p>	No barriers relating to sex were identified by respondents.	The local authority does not believe that people sharing this characteristic would be more affected by the proposal than people who do not share this characteristic.



Protected characteristics groups under the Equality Act 2010	What do you know? Summary of data about your service-users and/or staff	What do people tell you? Summary of service-user and/or staff feedback	What does this mean? Impacts identified from data and feedback (actual and potential)	What can you do? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
		at the Church Road site and 33% were undecided.		
Sexual orientation	The local authority does not believe that people sharing this characteristic would be more affected by the proposal than people who do not share this characteristic.	Not applicable.	Not applicable.	No specific action identified at this stage.
Marriage and civil partnership	Not applicable to this proposal.	Not applicable.	Not applicable.	Not applicable.
Armed Forces	Not applicable to this proposal.	Not applicable.	Not applicable.	Not applicable.
Impacts on community cohesion	The local authority is responsible for promoting a good supply of school places that offer high quality education through planning, organising, and commissioning places in a way that raises attainment, increases	No specific feedback was given relating to the wider community.	Not applicable.	The proposal would bring a number of benefits to the school community, including: <ul style="list-style-type: none"> • improved access by having a single site for primary and secondary pupils to shared spaces, such



Protected characteristics groups under the Equality Act 2010	What do you know? Summary of data about your service-users and/or staff	What do people tell you? Summary of service-user and/or staff feedback	What does this mean? Impacts identified from data and feedback (actual and potential)	What can you do? All potential actions to:
	diversity, encourages collaboration between schools and promotes community cohesion.			<ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations <p>as the sports facilities and specialist rooms.</p> <ul style="list-style-type: none"> • Better use of the school's budget as some services could be centralised, e.g. one reception area at Church Road for primary and secondary and better utilisation and deployment of staff. • Improved ability to share learning resources. • Pupils and their families having a better sense of community, belonging and identity through bringing the primary and secondary phases together on one site.



Additional categories

(identified locally as potentially causing / worsening inequality)

Characteristic	What do you know?	What do people tell you?	What does this mean?	What can you do?
Rurality	Not applicable to this proposal.	Not applicable	Not applicable	Not applicable
Carers	Not applicable to this proposal.	Not applicable	Not applicable	Not applicable
Other groups that may be differently affected (including but not only: homeless people, substance users, care leavers)	Not applicable to this proposal.	Not applicable	Not applicable	Not applicable

Assessment of overall impacts and any further recommendations - include assessment of cumulative impacts (where a change in one service/policy/project may have an impact on another)

In recent years, the local authority has taken action to address the increasing demand for special school and specialist facility places and manage the high cost of placements in non-maintained independent schools. 381 new special school and alternative provision places have opened in the county in four establishments. We have created 72 new specialist facility places at seven mainstream schools (five primary and two secondary). Two mainstream schools have extended the designation of their existing specialist facilities. This is to reflect the growing demand for provision for children with autism.

We are continuing our strategy of increasing the number of places available in special schools and specialist facilities. This is alongside developing inclusion in mainstream schools. This includes the proposed project to reorganise and expand Grove Park School with the positive benefits that would bring set out above.

2. List detailed data and/or community feedback that informed your EqIA

Source and type of data (e.g. research, or direct engagement (interviews), responses to questionnaires, etc.)	Date	Gaps in data	Actions to fill these gaps: who else do you need to engage with? (add these to the Action Plan below, with a timeframe)
The local authority consulted with key stakeholders and interested parties on the proposals.	19 May 2023 to 23 June 2023	Not applicable	Not applicable
The local authority published a statutory proposal providing key stakeholders and interested parties with the opportunity to make further representation on the proposals.	10 January 2025 to 6 February 2025	Not applicable	Not applicable

4. Prioritised Action Plan

NB: These actions must now be transferred to service or business plans and monitored to ensure they achieve the outcomes identified.

Impact identified and group(s) affected	Action planned	Expected outcome	Measure of success	Timeframe
In the event that the decision is taken to lower the age range to 2019, and to enlarge the premises at the school's Church Road site the local authority would work with the school to implement the proposal by 1 September 2027.				