

Equality & Health Impact Assessment (EHIA)

Document control

Title of activity:	Harrow Lodge, Consultation on the proposed establishment of a Special Educational Needs & Disabilities Unit for young people with Communication & Interaction Needs
Lead officer:	Pooneeta Mahadeo, School Organisation Manager, Starting Well
Approved by:	Trevor Cook, Assistant Director of Education, Starting Well
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Version Number	V0.2
Version Number Date and Key Changes Made	V0.2 11/09/2025

Did you seek advice from the Corporate Policy & Legal?	No
Did you seek advice from the Public Health team?	No
Does the EHIA contain any confidential or exempt information that would prevent you publishing it on the Council's website? See Publishing Checklist.	No

Please note that EHIAs are **public** documents and unless they contain confidential or sensitive commercial information must be made available on the Council's <u>EqHIA webpage</u>.

Please submit the completed form via e-mail to <u>READI@havering.gov.uk</u> Thank you.

1. Equality Health Impact Assessment Checklist

Please complete the following checklist to determine whether or not you will need to complete an EHIA and ensure you keep this section for your audit trail. If you have any questions, please contact READI@havering.gov.uk for advice from either the Corporate Diversity or Public Health teams. Please refer to this Guidance on how to complete this form.

About your activity

ADC	out your activity				
1	Title of activity	& Disabilitie	s Unit for you	oung peopl	ducational Needs le with ds at Harrow
2	Type of activity	Strategy inclu	uding project	t description	os
3	Scope of activity	The Scope of the activity is to assess the impact of the proposal to implement a SEND unit for Communication and Interaction needs at Harrow Lodge Primary Schoo The activity will also cover any decisions and processe required for the proposal to be effectively implemented whilst ensuring that it meets all the aims and priorities set out in the strategy.			or Communication ge Primary School. ions and processes ively implemented
4a	Are you changing, introducing a new, or removing a service, policy, strategy or function?	Yes	If the answ		
4b	Does this activity have the potential to impact (either positively or negatively) upon people from different backgrounds?	Yes	all of the		If the answer to all of the questions (4a, 4b
4c	Use the lif you & 4c) is		& 4c) is 'NO' Go to question 6.		
5	If you answered YES:	Please complete the EHIA in Section 2 of this document. Please see Appendix 1 for Guidance.			
6	If you answered NO:		HIA. This is e nder the Equ	essential, in uality Act 20	

Completed by:	Pooneeta Mahadeo, School Organisation Manager, Starting Well
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Date:	10.12.2024
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2. The EHIA – How will the strategy, policy, plan, procedure and/or service impact on people?

Background/context:

All Local Authorities including Havering have a statutory duty to provide sufficient schools places to all children that live in the borough.

The Children and Young People Education Place Planning Plan 2023-2027 provides an overarching framework and evidence-base for identifying projects (and allocating funding to those projects) to implement as part of the Council's strategy of ensuring that there are sufficient school places to meet likely future demands. It sets out the council's policy for school organisation and plans to ensure there is sufficient capacity to meet demand for early years, primary, secondary, post-16, special school and alternative education provision across the borough. It also highlights the forecast number of children and young people in Havering and breaks this down to smaller geographical areas (planning areas within these) to show where there may be a need for more or fewer school places.

The corporate plan for Havering 'The Havering you want to be part of', includes the priority to offer inclusive services that raise aspiration and meet the needs of our growing population of children, families, and young adults, including those in our care.

Havering's SEND and Alternative Provision Strategy 2024 – 2028 emphasises the local authority's vision to ensure children, young people, and families have access to the same level of high-quality support and education, wherever they live in Havering. That children and young people with SEND can access the help and support they need to thrive and achieve within their local communities, that they can go to local education provision that meets their needs, access services and play an active role in the community close to where they live.

While there are a number of schools operating a C&I SEND Unit, additional primary C&I SEND Units are required in order to meet the growing number of primary school aged pupils with C&I needs.

A new C&I SEND Unit at Harrow Lodge Primary School will help meet key objectives from both the corporate and education visions for Havering.

Who will be affected by the activity?

- All parents/carers of pupils resident in Havering
- All pupils attending a Havering school or College
- All Education providers
- Havering residents especially those who are residents near schools and in areas of population growth and projected demand of school places
- All voluntary organisations who provide alternative education in the borough
- All Governing body members of maintained schools
- Local Governing members of academies
- Members of Academy Trust boards

- The Diocese of Brentwood and Chelmsford
- Housing Developers and those seeking planning permission for residential property

Protected Characteristic - Age: Consider the full range of age groups				
If there is an impact on under 18s, how have you / will you ensure their views are gained to inform decision making?				
Please tick (✓) Overall impact:		Overall impact:		
the relevant l	box:	A new C&I SEND Unit at Harrow Lodge Primary School will have a		
Positive	~	positive impact on children and young people of school age living in Havering. This aligns with key priorities in our corporate plan such as		
Neutral		"We support residents of all ages to live socially connected, independent and healthy lives. We engage with individuals, families		
Negative		and our partners to help residents reach their full potential" as we are trying to implement specialist education provision. All of the above will positively impact on the quality of Early Year and school age care available within the borough, having a knock on effect to the parents of those children. The expansions and new education provision to the borough will provide new job opportunities, positively impacting on adults of a working age, giving a boost to the local economy.		

The Children and Young People Education Place Planning Plan highlights that 'In Havering, we have seen an increase of 52% in the number of births between calendar years 2002 to 2016. This includes a 19% increase in the birth rate from 2012 to 2016. However since the birth rate peaked in 2016, we have seen a year on year reduction in the birth rate in Havering, with the birth rate decreasing by 11% between 2016 to 2021.'

The Plan details how we will ensure sufficiency of early years, primary, secondary, SEND, post 16 and alternative provision places for years to come.

Sources used:

- Birth data received from the ONS.
- Population projections produced by the GLA
- Historic pupil data obtained from the school census
- Housing development data obtained from the GLA and our planning department.
- School Roll Projections
- Consultation survey report on the draft The Children and Young People Education Place Planning Plan 2023-2027
- Census 2021
- The Havering you want to be part of; Our Corporate Plan for 2024-2027

Protected Characteristic - Disability: Consider the full range of disabilities; including physical, mental, sensory, progressive conditions and learning difficulties. Also consider neurodivergent conditions e.g. dyslexia and autism.

Please tick (,	Overall impact: The projects will positively impact those with SEND and their families
Positive	V	as the projects is to build new SEND units, to meet increasing demand and to build inclusion within the community. Making appropriate local
Neutral		provision available is positive for children with special educational needs.
		Our strategy outlines a number of proposed actions that will ensure that children, young people with SEND and their families have the right support at the right time including delivering an ongoing programme to create more SEND units in mainstream settings and to expand capacity within our established special schools.
Negative		There are currently five primary SEND Units totalling 77 places, catering to the need of C&I. Given the increasing numbers of C&I pupils there is a need for additional primary SEND units to support these children within a mainstream school setting whilst receiving support from a specialist unit so that they can receive the best educational offer possible.

The Children and Young People Education Place Planning Plan shows that there is an increase in the number of children in Havering within mainstream Primary and Secondary schools with an EHCP.

The number of Havering children and young people with EHCPs has risen by 53% between 2020 and 2024. The biggest growth has been seen among those whose main area of need is communication and interaction, including autism, and social, emotional and mental health needs.

The Council's SEND projections show that they expect the number of children and young people with an Education, Health and Care (EHC) plan to increase over the next five years as shown in the table below:

Academic year	Cognition and Learning	Communication and Interaction	SEMH	Physical and/or Sensory	Totals
2023/2024	603	1438	464	246	2751
2024/2025	668	1611	517	274	3070
2025/2026	722	1770	561	298	3351
2026/2027	781	1938	610	323	3652
2027/2028	842	2073	662	344	3921

There are currently five primary SEND Units totalling 77 places, catering to the need of C&I. Given the increasing numbers of C&I pupils there is a need for additional primary SEND units to support these children within a mainstream school setting whilst receiving support from a specialist unit so that they can receive the best educational offer possible.

With the continued growth of children with an EHCP, it is not sustainable to continue placing them in a mainstream setting and therefore it is essential that we implement

further specialist SEND places, through the form of SEND units and special schools, whichever best meets the child's needs.

This aligns to our Vision for Children and Young People with SEND and in Alternative Provision, by working with children and young people with SEND, their families, and those whose role is to support them, we have established a shared vision for a SEND and AP system where every school and setting is confident, skilled, and enabled to effectively support our children with SEND.

Sources used:

- Special Educational Needs, Disabilities (SEND) and Alternative Provision (AP)
 Strategy 2024 2028
- Projected school population
- School Census data
- The Children and Young People Education Place Planning Plan 2023-2027

Protected C	Protected Characteristic – Sex / gender: Consider both men and women		
Please tick (1		Overall impact: The overall impact on is positive for both men and women. Most of our	
Positive	✓	education provision from early years right through to post 16 including special schools and alternative provision is largely co-educational.	
Neutral		The SEND unit for Harrow Lodge will be co-educational.	
Negative			

Evidence:

All our early years, primary, special and post-16 provision are co-educational. 4 out of the 18 secondary schools in the borough are single sex, (two boys and two girls).

- School Census data
- Consultation survey report on the draft Children and Young People Education Place Planning Plan 2023-2027

Protected Characteristic – Ethnicity / race / nationalities: Consider the impact on				
different mir	different minority ethnic groups and nationalities			
Please tick (V)	Overall impact:		
the relevant l	box:	The overall impact on this protected characteristic is neutral. National		
Positive		legislation determines that education establishments including schools cannot discriminate on ethnicity or racial grounds.		
Neutral	~	Creating additional school and childcare places will enable us to meet		
Negative		our vision of ensuring that every child has access to a good local school providing an opportunity for every young person in the borough to thrive, thereby securing outcomes that are above the national		

	average.

According to the Census 2021, London remains the most ethnically diverse region of England and saw an 8.1% percentage point decrease in people who identified as White British from 44.9% in 2011 to 36.8% in 2021. Havering also followed this trend with a 16.8% percentage point decrease from 83.3% in 2011 to 66.5% in 2021. Havering and Bromley are the least diverse London Boroughs with both having a White British population of 66.5%. This compares with 74.4% for England, but is significantly higher than the 36.8% figure for London.

However, all our education provision is fully inclusive. Ethnicity or race is not a factor when considering the commissioning of education provision.

Sources used:

- School Census data
- Consultation survey report on the draft Children and Young People Education Place Planning Plan 2023-2027
- Census 2021

Protected Characteristic - Religion / faith: Consider people from different religions or				
beliefs, inclu	beliefs, including those with no religion or belief			
Please tick (1	/)	Overall impact:		
the relevant k	box:	The overall impact on people from different religions or beliefs including		
Positive	✓	those with no religion or belief is positive. National legislation determines that schools cannot discriminate on religion grounds.		
Neutral		Creating additional places including at Harrow Lodge Primary School		
Negative		will enable us to meet our objective of providing access to a good local school for every Havering child.		

Evidence:

The diversity across Havering is further demonstrated by the varying school sizes, governance arrangements and the number of voluntary aided schools. In addition, there are a number of Alternative Provision and Independent settings within Havering.

Where faith based schools are concerned, we will seek to work collaboratively with our education partners, this includes the Dioceses and other relevant religious organisations.

- School Roll Projections
- School Census data
- Consultation survey report on the draft Children and Young People Education Place Planning Plan 2023-2027

Protected Characteristic - Sexual orientation: Consider people who are heterosexual,				
lesbian, gay or bis	lesbian, gay or bisexual			
Please tick (✓)	Overall impact:			
the relevant box:	-			

Positive		The overall impact on this protected characteristic is neutral. All our education provision is fully inclusive.			
Neutral	✓	Ensuring there is sufficient capacity to meet demand for early years,			
Negative		primary, secondary, post-16 and special school places across the borough will enable us fulfil our statutory duty.			

81% of our surveyed participants who responded to our equality and diversity monitoring form during the consultation for our CYPEPPP stated that they were heterosexuals. No issues regarding sexual orientation were raised during the consultation.

Sexual orientation is not considered as a factor when commissioning educational provision or in the determination of sufficiency of education provision. According to the ONS Census 2021, the majority of Havering residents aged 16 and above (91%) identify as straight or heterosexual. In total, 2% identify with one of the LGB+ orientations ("Gay or Lesbian", "Bisexual" or "Other sexual orientation"). 7% of those asked did not answer.

Havering has the lowest proportion of residents aged 16 and over in London who identify as LGB+ orientation.

Sources used:

- Consultation survey report on the draft Children and Young People Education Place Planning Plan 2023-2027
- Census 2021

Protected Characteristic - Gender reassignment: Consider people who are seeking,				
undergoing	undergoing or have received gender reassignment surgery, as well as people whose			
gender iden	tity is	different from their gender at birth		
	Please tick (✓) Overall impact:			
the relevant box: The overall impact on this protected characteristic is neutral. All our				
Positive		education provision is fully inclusive		
Neutral	✓	Ensuring there is sufficient capacity to meet demand for early years, primary, secondary, post-16 and special school places across the		
Negative borough will enable us fulfil our statutory duty.				

Evidence:

91% of all respondents who completed the CYPEPPP equality monitoring form identified that their current gender was the same assigned at birth.

Gender reassignment is not considered as a factor when commissioning educational provision or in the determination of sufficiency of education provision. According to the ONS Census 2021, the majority of Havering residents aged 16 and above have retained their gender identity as registered at birth. In total, less than 1% identify with gender identity being different from the one registered at birth. Within London, Havering has the 5th lowest proportion of residents aged 16 and over reporting that the gender that they identify with now is different to their sex registered at birth.

Sources used:

- Consultation survey report on the draft Children and Young People Education Place Planning Plan 2023-2027
- Census 2021

Protected Characteristic – Marriage / civil partnership: Consider people in a marriage or civil partnership			
Please tick (1 the relevant b	,	Overall impact: The overall impact on this protected characteristic is neutral. All our	
Positive		education provision is fully inclusive	
Neutral	✓	Ensuring there is sufficient capacity to meet demand for early years, primary, secondary, post-16 and special school places across the	
Negative		borough will enable us fulfil our statutory duty.	

Evidence:

Majority of respondents (62%) who completed the Children and Young People Education Place Planning Plan 2023-2027 equalities monitoring form stated that they were in a marital relationship.

No issues regarding marriage/civil partnership were raised during the consultation. Gender reassignment is not considered as a factor when commissioning educational provision or in the determination of sufficiency of education provision

For Havering as a whole, we find the following:

Figure 19: Census 2021 data on legal partnership status for Havering Residents

Legal Partnership Status	% Of Havering Residents
Never married and never registered a civil	36.9
partnership	
Married or in a registered civil partnership	47.0
Separated, but still legally married or still	1.9
legally in a civil partnership	
Divorced or civil partnership dissolved	7.8
Widowed or surviving civil partnership	6.4
partner	

- Consultation survey report on the draft the Children and Young People Education Place Planning Plan 2023-2027
- Census 2021

Protected C	Protected Characteristic - Pregnancy, maternity and paternity: Consider those who			
are pregnan	are pregnant and those who are taking maternity or paternity leave			
Please tick (Please tick (🗸) Overall impact:			
the relevant box:		The overall impact on this protected characteristic is neutral. All our		
Positive		education provision is fully inclusive		

Neutral	✓	Ensuring there is sufficient capacity to meet demand for early years,
		primary, secondary, post-16 and special school places across the borough will enable us fulfil our statutory duty.
Negative		However, our ability to meet demand for EY and childcare places has a future impact on those who are currently pregnant, on maternity or paternity leave.

2% of the surveyed the Children and Young People Education Place Planning Plan 2023-2027 participants were either pregnant or have given birth in the last 26 weeks. No issues regarding pregnancy, undertaking maternity or paternity leave were raised during the consultation.

Being pregnant or undertaking maternity/ paternity leave is not considered as a factor when commissioning educational provision or in the determination of sufficiency of education provision.

Sources used:

 Consultation survey report on the draft the Children and Young People Education Place Planning Plan2023-2027

Socio-economic status: Consider those who are from low income or financially excluded						
background	backgrounds					
Please tick (✓) the relevant box:		Overall impact: The overall impact on those who are from low income or financially				
Positive	~	excluded backgrounds is positive.				
Neutral		By creating more SEND places to meet demand through new schools and SEND units will help us realise our vision to ensure the growing				
Negative		SEND need is met and that every child has access to a great education. An increase in school admissions across the Borough may also have a 'knock-on effect' on other budgets such as free school meals, home to school transport and the demand for alternative provision and support services. Any pressures arising will be addressed through the appropriate channels as the needs arise.				

Evidence:

Social mobility remains a serious issue and the changes in Havering's population has historically been influenced by increased births, housing developments and economic migration. The Council's provision of school places, and, in particular, SEND places for which there is a growing demand, must also respond to meet the changing needs of residents.

The Joseph Roundtree Foundation report on 'Special educational needs and their link to poverty' explores the links between SEND and poverty. The report shows that poverty is both a cause and an effect of SEND.

Therefore, supporting all phases of our education provision to develop a strong strategy and increasing access to only good/outstanding provision will ensure that all children have the best possible start in life, which will enable them achieve and reach their full potential.

Access to adequate, affordable and high quality childcare (pre-school and school age) provision can play a key role in children's development. Where it enables increased parental employment rates of low income households, it may also help to reduce income inequalities.

Over 7,000 children are estimated to be living in poverty in Havering. However, Havering is among the London boroughs with the lowest proportion of children living in poverty (16%). This rate is also significantly lower than the England average (17%). Within Havering [analysis shows] a high proportion of children living in poverty are located in the North and South in areas considered as relatively more deprived.

Growing up in poverty damages children's health and well-being, adversely affecting their future health and life chances as adults. Ensuring a good environment in childhood, especially early childhood, is important. A considerable body of evidence links adverse childhood circumstances to poor child health outcomes and future adult ill health.

Sources used:

- Joseph Roundtree Foundation 'Special educational needs and their link to poverty'
- Havering Demographic Profile Joint Strategic Needs Assessment 2023-2024

Health & Wellbeing Impact: Consider both short and long-term impacts of the activity on a person's physical and mental health, particularly for disadvantaged, vulnerable or at-risk groups. Can health and wellbeing be positively promoted through this activity? Please tick (✓) all Overall impact: The overall impact on health and well being is the relevant positive, particularly for SEND pupils in the borough. boxes that apply: The SEND and AP Strategy sets out our shared vision and priorities to **Positive** ensure that all children and young people with SEND achieve ambitious educational, health and care outcomes. Each priority in the Neutral strategy focuses on a wide range improvements to health and wellbeing. **Negative** Do you consider that a more in-depth HIA is required as a result of this brief assessment? Please tick (✓) the relevant box Yes No

Havering Children's Services vision is clear: we are here to enable all children and families in the borough to lead happy, healthy lives, where all children get a good start in life and live in a borough where families and communities look after themselves and each other.

- Special Education Needs, Disabilities (SEND) and Alternative Provision (AP) Strategy 2024-2028
- The Children and Young People Education Place Planning Plan 2023-2027

3. Health & Wellbeing Screening Tool

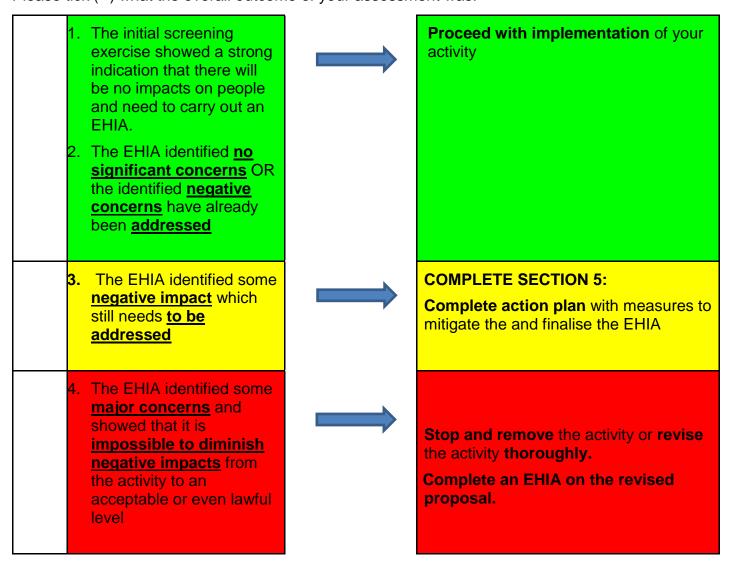
Will the activity / service / policy / procedure affect any of the following characteristics? Please tick/check the boxes below The following are a range of considerations that might help you to complete the assessment.

Lifestyle YES NO x	Personal circumstances YES NO	Access to services/facilities/amenities YES NO
Diet	Structure and cohesion of family unit	
Exercise and physical activity	□ Parenting	to Workplaces
☐ Smoking	Childhood development	to Housing
Exposure to passive smoking	∠ Life skills	to Shops (to supply basic needs)
☐ Alcohol intake	Personal safety	to Community facilities
Dependency on prescription drugs	Employment status	to Public transport
Illicit drug and substance use	☐ Working conditions	
Risky Sexual behaviour	Level of income, including benefits	
Other health-related behaviours, such	□ Level of disposable income	to Healthcare
as tooth-brushing, bathing, and wound	☐ Housing tenure	
care	☐ Housing conditions	
	□ Educational attainment	to Respite care
	Skills levels including literacy and numeracy	to Leisure and recreation services and facilities
Social Factors YES NO	Economic Factors YES NO	Environmental Factors YES NO
Social contact	Creation of wealth	Air quality
Social support	Distribution of wealth	Water quality
Neighbourliness	Retention of wealth in local area/economy	Soil quality/Level of contamination/Odour
$oxed{\boxtimes}$ Participation in the community	Distribution of income	Noise levels
Membership of community groups	Business activity	☐ Vibration
Reputation of community/area		Hazards
Participation in public affairs	Availability of employment opportunities	Land use
Level of crime and disorder	Quality of employment opportunities	Natural habitats
Fear of crime and disorder	Availability of education opportunities	Biodiversity
Level of antisocial behaviour	Quality of education opportunities	Landscape, including green and open spaces
Fear of antisocial behaviour	Availability of training and skills development opportunities	Townscape, including civic areas and public realm
☐ Discrimination	Quality of training and skills development opportunities	Use/consumption of natural resources
Fear of discrimination	☐ Technological development	Energy use: CO2/other greenhouse gas emissions
Public safety measures	Amount of traffic congestion	Solid waste management
Road safety measures		Public transport infrastructure

4. Outcome of the Assessment

The EHIA assessment is intended to be used as an improvement tool to make sure the activity maximises the positive impacts and eliminates or minimises the negative impacts. The possible outcomes of the assessment are listed below and what the next steps to take are:

Please tick (✓) what the overall outcome of your assessment was:



5. Action Plan

The real value of completing an EHIA comes from identifying the actions that can be taken to eliminate/minimise **negative** impacts and enhance/optimise positive impacts. In this section you should list the specific actions that set out how you will mitigate or reduce any **negative** equality and/or health & wellbeing impacts, identified in this assessment. Please ensure that your action plan is: more than just a list of proposals and good intentions; if required, will amend the scope and direction of the change; sets ambitious yet achievable outcomes and timescales; and is clear about resource implications.

Protected characteristic / health & wellbeing impact	Identified Negative or Positive impact	Recommended actions to mitigate Negative impact* or further promote Positive impact	Outcomes and monitoring**	Timescale	Lead officer
Disability	Positive	Additional SEND school places through delivery of the SEND unit.	Track the number of children moving through the SEND unit over the years. Then monitor projected increased demand in SEND, more SEND places will be made available across Havering accordingly.	2027/28	Marcus Bennett
Safeguarding and SEND Support Quality	Negative	Multiple consultation responses raised serious concerns about safeguarding practices, staff qualifications, and SEND support delivery at Harrow Lodge. To include a targeted safeguarding review and SEND	To continuously monitor the progress against targeted safeguarding review outcomes and SEND workforce development plan.	2027/28	Marcus Bennett

		workforce development plan.			
Impact on Non- SEND Pupils	Negative	Concerns about disruption to mainstream pupils.	Harrow Lodge to add monitoring of mainstream pupil outcomes and classroom dynamics post-implementation.	2027/28	Harrow Lodge
Traffic and Environmental Justice	Negative	Some residents have raised concerns about traffic, noise, and transparency.	Traffic and Noise impacts on health outcomes, environmental assessments have taken place. Assessments cross referenced here. HL Arboricultural Impact Assessment a HL Geoenvironmental r HL SEND Block Noise Impact Assess HL Transport Statement.pdf	2027/28	Asset Management
Resident Engagement and Communication	Negative	Some residents felt excluded from the consultation process.	Harrow Lodge need to engage more with residents going forward.	2027/28	Harrow Lodge

- Add further rows as necessary

 * You should include details of any future consultations and any actions to be undertaken to mitigate negative impacts.

 ** Monitoring: You should state how the impact (positive or negative) will be monitored; what outcome measures will be used; the known

(or likely) data source for outcome measurements; how regularly it will be monitored; and who will be monitoring it (if this is different from the lead officer).

6. Review

In this section you should identify how frequently the EHIA will be reviewed; the date for next review; and who will be reviewing it.

Review:

The EHIA will be reviewed Harrow Lodge, Consultation on the proposed establishment of a Special Educational Needs & Disabilities Unit for young people with Communication & Interaction Needs

Scheduled date of review: December 2027

Lead Officer conducting the review: Pooneeta Mahadeo, School Organisation Manager,

Starting Well.

*Expand box as required

Please submit the completed form via e-mail to READI@havering.gov.uk
Thank you.