

Equality Analysis

Directorate: Education Service Area: Special Educational Needs and Disabilities	Lead Officer: Tom Knott (SEND Commissioning Officer) Date completed: 10.06.19
Service / Function / Policy / Procedure to be assessed: Proposed permanent expansion of Green Park School.	
Is this: New / Proposed <input checked="" type="checkbox"/> Existing/Review <input type="checkbox"/> Changing <input type="checkbox"/> (Please tick appropriate box)	Review date:

Part A – Initial Equality Analysis to determine if a full Equality Analysis is required.

What are the aims and objectives/purpose of this service, function, policy or procedure?

<p>Green Park School is community special school located within the Bilston North Ward. The school caters for pupils aged 3-19 with Severe Learning Difficulties (SLD) and Profound and Multiple Learning Difficulties (PMLD).</p> <p>It is proposed that Green Park School is permanently expanded from 108 places to 144 places with effect from 1 September 2019.</p> <p>The creation of additional capacity within this popular and successful school would provide extra places to meet an increasing level of demand in the City.</p>

Please indicate its relevance to any of the equality duties (below) by selecting Yes or No?

	Yes	No
Eliminating unlawful discrimination, victimisation and harassment		X
Advancing equality of opportunity	X	
Fostering good community relations	X	

If not relevant to any of the three equality duties and this is agreed by your Head of Service, the Equality Analysis is now complete - please send a copy to the Equality & Diversity Team. **If any of the three equality duties are relevant**, a Full Equality Analysis will need to be undertaken (PART B below).

PART B: Full Equality Analysis.

Step 1 – Identifying outcomes and delivery mechanisms (in relation to what you are assessing)

What outcomes are sought and for whom?	Permanent expansion in capacity at Green Park School to meet anticipated demand.
Are there any associated policies, functions, services or procedures?	<p>Relevant Legislation</p> <ul style="list-style-type: none"> • Schools Organisation Regulations 2013 • Education Act 2002 • The Education Act 2011 • The Education and Inspections Act 2006 • Equality Act 2010 • Children and Families Act 2014 • Human Rights Act 1998. <p>Local Policy:</p> <ul style="list-style-type: none"> • City of Wolverhampton Council's Corporate Plan • City of Wolverhampton Council's Vision for School Organisation 2018-2020

	<ul style="list-style-type: none"> City of Wolverhampton Council's Joint Special Educational Needs and Disabilities Strategy.
If partners (including external partners) are involved in delivering the service, who are they?	Green Park School

Step 2 – What does the information you have collected, or that you have available, tell you?

What evidence/data already exists about the service and its users? (in terms of its impact on the 'equality strands', i.e. race, disability, gender, gender re-assignment, age, religion or belief, sexual orientation, maternity/pregnancy, marriage/civil partnership and other socially excluded communities or groups) and **what does the data tell you?** e.g. are there any significant gaps?

Numbers on roll at the school have increased markedly in recent years (115 in January 2015 to 136 in January 2019). Current numbers on roll significantly exceed the designated capacity of the school (108). To meet demand, the City of Wolverhampton Council has commissioned 144 places at Green Park School for the 2019-20 academic year.

Age:

In January 2018, there were 127 pupils on roll at Green Park School. Pupils were spread across the age range 3 to 19.

Disability:

In January 2018, all pupils on roll at Green Park School had a special educational need or disability. 96 pupils had an Education, Care and Health Plan (EHCP) and 31 pupils had a Statement of Special Educational Need.

Gender:

In January 2018, 79 pupils were male and 48 pupils were female.

Ethnicity:

In January 2018, 56 pupils on roll at Green Park School were identified as being White British.

Has there been any consultation with, or input from, customers / service users or other stakeholders? If so, with whom, how were they consulted and what did they say? If you haven't consulted yet and are intending to do so, please list which specific groups or communities you are going to consult with and when.

The proposed expansion qualifies as a significant change (prescribed alteration) which requires the undertaking of statutory consultation and decision-making processes in accordance with 'The School Organisation (Prescribed Alterations to Maintained Schools) (England) Regulations 2013' and 'The Education and Inspections Act 2006 – as amended by The Education Act 2011'.

Consultation and Decision-Making Process:

Date	Process
4 March 2019 to 31 March 2019	Pre-publication Consultation.
April 2019	The Cabinet Member for Education and Skills, in consultation with the Director of Education, consider all outcomes of Pre-publication Consultation and determine progression to a period of Representation.
13 May 2019 to 9 June 2019	Representation Period.
10 July 2019	Cabinet consider all outcomes of consultation and make a final decision on the proposal.
17 July 2019 to 13 August 2019	Appeals Period.
1 September 2019	Subject to approval, proposal is formally implemented.

Pre-publication Consultation:

Pre-publication Consultation commenced on 4 March 2019 and ran until 31 March 2019. During Pre-publication Consultation, letters and consultation documents were distributed to in excess of 400 stakeholders. Consultees included the Governing Board of Green Park School, members of staff at Green Park School, parents/carers of pupils attending Green Park School, all Wolverhampton Ward Councillors and all schools in Wolverhampton.

During the Pre-publication Consultation period, 35 written responses were received by the City of Wolverhampton Council. These were completed by a range of stakeholders including members of staff at Green Park School, parents/carers of pupils at Green Park School, members of the Governing Board at Green Park School and pupils at Green Park School.

Consultation Question	Number of Responses Received	Yes	No	Don't Know	Abstained
Do you agree with the proposal to permanently increase the capacity of Green Park School?	35	22 (62.9%)	3 (8.6%)	7 (20.0%)	3 (8.6%)

Respondee Summary:

- Age: 2 (Under 16), 5 (25 to 34), 10 (35 to 44), 10 (45 to 54), 2 (55 to 64), 3 (over 65), 3 (abstained)
- Gender: 27 (female), 7 (male), 1 (abstained)

- Gender Identity: 31 respondees to consultation were identified as having the same gender identity as assigned at birth, 2 respondees were identified as having a different gender identity than that assigned at birth, 2 respondees (abstained)
- Sexual Orientation: 27 respondees were identified as being heterosexual, 8 respondees (abstained)
- Ethnic Origin: 2 (Any Other), 2 (Asian or Asian British - Indian), 2 (Black or Black British – African), 2 (Black or Black British – Caribbean), 1 (Other Asian or Asian British), 22 (White - British), 1 (White – Irish), 1 (White – Other European), 1 (White and Black African), 1 (abstained)
- Religion: 1 (Any Other Religion), 20 (Christian), 1 (Hindu), 7 (No religion), 1 (Sikh), 5 (abstained)
- Disability: 3 respondees identified as having a disability, 25 identified as not having a disability, 7 (abstained)

Representation Period:

The Representation Period commenced on 13 May 2019 and concluded on 9 June 2019. At the start of the Representation Period, a public notice was published in the Express and Star Newspaper and consultation documentation including the Complete Proposal was published on the Council website and distributed to relevant stakeholders. No responses were received by the City of Wolverhampton Council during Representation.

Are there any complaints, compliments, satisfaction surveys or customer feedback that could help inform this assessment? If yes, what do these tell you?

A number of supportive comments regarding the proposal were received during Pre-publication Consultation, including;

- “Yes, would be brilliant as more children with disabilities will get a chance to get opportunities to get the right level of care they need.” (Response 8 – Parent/carer of a pupil at Green Park School).
- “The City is growing - every child needs an education. Green Park is an excellent school to provide this.” (Response 15 – Member of Staff at Green Park School).
- “With a growing city demand for school places is inevitable, so this is an important need that more places are made to accommodate the growing population, with an amazing school” (Response 20 - Member of Staff at Green Park School).

A number of concerns and considerations regarding the proposal were also received during Pre-publication Consultation, including;

- “I understand that more places are needed but I don’t feel it is suitable for the school unless funds are available for expansion/staffing both teaching and admin. More spaces would benefit the children, but it needs to be balanced with the needs of staff as to the increase of the work load.” (Response 22 – Member of Staff at Green Park School).
- “I agree that more places are needed but would hope that staffing levels and car parking are going to be looked at.” (Response 23 - Parent/carer of a pupil at Green Park School).
- “My main concern is with extra pupil numbers will the excellent standard of Green Park School suffer?” (Response 31 – Other - Member of Voluntary Committee).
- “Whilst delighted that the school remains a very popular choice for parents my concerns centre around the suitability of the building for an increase in pupil numbers. Special needs pupils require increased space for movement, storage of equipment, medical needs and staff facilities, together with increased staffing.” (Response 32 - Other - Member of Voluntary Committee).

Step 3 – Identifying the negative impact.

a. Is there any negative impact on individuals or groups in the community?

<p>Barriers:</p> <p>What are the potential or known barriers/impacts for the different ‘equality strands’ set out below? Consider:</p> <ul style="list-style-type: none"> • Where you provide your service, e.g. the facilities/premises; • Who provides it, e.g. are staff trained and representative of the local population/users? • How it is provided, e.g. do people come to you or do you go to them? Do any rules or requirements prevent certain people accessing the service? • When it is provided, e.g. opening hours? • What is provided, e.g. does the service meet everyone’s needs? How do you know? <p>* Some barriers are justified, e.g. for health or safety reasons, or might actually be designed to promote equality, e.g. single sex swimming/exercise sessions, or cannot be removed without excessive cost. If you believe any of the barriers identified to be justified then please indicate which they are and why.</p> <p>Solutions:</p> <p>What can be done to minimise or remove these barriers to make sure everyone has equal access to the service or to reduce adverse impact? Consider:</p> <ul style="list-style-type: none"> • Other arrangements that can be made to ensure people’s diverse needs are met; • How your actions might help to promote good relations between communities; • How you might prevent any unintentional future discrimination. 			
Equality Themes	Positive Impacts	Negative Impacts identified	Solutions (ways in which you could mitigate the negative impact)
Age (including children, young people and older people)	Not applicable to children under 18.	Not applicable to children under 18.	Not applicable to children under 18.

<p>Disability (including carers)</p>	<p>The proposal aims provide extra places to meet an increasing level of demand in the City.</p> <p>The proposal would enable additional pupils to be catered for locally within a high quality popular, special school.</p>	<p>The need to ensure that both school staff and health providers have facilities available to effectively support the needs of an increasing population.</p> <p>The need to ensure that appropriate staffing and resources are available to meet pupil needs.</p> <p>Local policy identifies an aspiration to develop solutions to offer opportunities for students with SEND to attend mainstream provision, unless doing so would be incompatible with the provision of efficient education for other children. An initial appraisal of this option suggests that it is unlikely to be cost effective nor practical to support the needs of pupils with Severe Learning Difficulties (SLD) and Profound and Multiple Learning Difficulties (PMLD) within mainstream provision, at this point.</p>	<p>Engagement with school and health providers during development and delivery of capital scheme.</p> <p>Extra pupils will attract additional resources which school leaders will utilise to meet student needs including tailoring the school's staffing structure.</p>
<p>Gender (men and women)</p>	<p>Not applicable.</p>	<p>Not applicable.</p>	<p>Not applicable.</p>
<p>Race (including Gypsies & Travellers and Asylum Seekers)</p>	<p>Not applicable.</p>	<p>Not applicable.</p>	<p>Not applicable.</p>
<p>Religion or belief (including people of no religion or belief)</p>	<p>Not applicable.</p>	<p>Not applicable.</p>	<p>Not applicable.</p>
<p>Gender Re-assignment (those that are going or have gone through a transition: male to female or female to male)</p>	<p>Not applicable.</p>	<p>Not applicable.</p>	<p>Not applicable.</p>

Pregnancy and Maternity	Not applicable.	Not applicable.	Not applicable.
Sexual orientation (including gay, lesbian, bisexual and heterosexual)	Not applicable.	Not applicable.	Not applicable.
Marriage and Civil Partnership	Not applicable.	Not applicable.	Not applicable.
Human Rights	Not applicable.	Not applicable.	Not applicable.

Step 4 – Changes or mitigating actions proposed or adopted

Having undertaken the assessment are there any changes necessary to the existing service, policy, function or procedure? What changes or mitigating actions are proposed?

No proposed changes necessary as engagement with the school and partners has taken place during development of capital works.

Continued close liaison and annual commissioning meetings between Green Park School and the City of Wolverhampton Council.

Step 5 – Monitoring

How are you going to monitor the existing service, function, policy or procedure ?

School Census information relating to the characteristics of pupils in schools in Wolverhampton are monitored on a termly basis along with the undertaking of established School Standards monitoring practices.

Part C - Action Plan

Barrier/s or improvement/s identified	Action Required	Lead Officer	Timescale
Not applicable.	Not applicable.	Not applicable.	Not applicable.

Equality Analysis approved by:

Head of Service: Adrian Leach	Date: 13.06.19
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