

## Equality Analysis

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| <b>Directorate:</b> Education  | <b>Lead Officer:</b> Tom Knott (SEND Commissioning Officer) |
| <b>Service Area:</b> Special Educational Needs and Disabilities  | <b>Date completed:</b> 31 October 2018                      |
| <b>Service / Function / Policy / Procedure to be assessed:</b>   |   |
| Proposed expansion and change in age range at Tettenhall Wood School.  |   |
| <b>Is this:</b><br>New / Proposed <input checked="" type="checkbox"/><br>Existing/Review <input type="checkbox"/><br>Changing <input type="checkbox"/> | <b>Review date:</b>   |

### 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?

Tettenhall Wood School is currently designated as a community special school with a capacity of 102 which caters for students with Autistic Spectrum Disorder aged 5-19. It is proposed that with effect from 1 September 2019:

- The capacity of Tettenhall Wood School is increased from 102 places to 120 places.
- The age range of Tettenhall Wood School is changed from 5-19 to 4-19.

In recent years, levels of demand for Tettenhall Wood School have increased significantly; consequently, numbers on roll at the school have increased from 57 in 2011-2012 to 110 in 2017-2018 (a 93% increase). The creation of additional capacity within this popular and successful school would provide extra places to meet an increased rate of autism in the City.

The proposed change in age range (to 4-19) at the school would enable Tettenhall Wood School to cater for Reception age pupils. This change would support pupils and families by promoting stability of provision and reduce the number of major transitions that pupils face.

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)

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| <b>What outcomes are sought and for whom?</b>                                | To increase the capacity of Tettenhall Wood School and extend the age range of the school with effect from 1 September 2019.   |
| <b>Are there any associated policies, functions, services or procedures?</b> | <p>Relevant Legislation</p> <ul style="list-style-type: none"> <li>• Schools Organisation Regulations 2013</li> <li>• Education Act 2002</li> <li>• The Education Act 2011</li> <li>• The Education and Inspections Act 2006</li> <li>• Equality Act 2010</li> <li>• Children and Families Act 2014</li> <li>• Human Rights Act 1998.</li> </ul> <p>Local Policy:</p> <ul style="list-style-type: none"> <li>• City of Wolverhampton Council's Corporate Plan</li> <li>• City of Wolverhampton Council's Vision for School Organisation</li> </ul> |

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|  | 2018-2020<br><ul style="list-style-type: none"> <li>City of Wolverhampton Council's Joint Special Educational Needs and Disabilities Strategy.</li> </ul> |
| <b>If partners (including external partners) are involved in delivering the service, who are they?</b> | Tettenhall Wood 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?

### Age:

In January 2018, there were 111 pupils on roll at Tettenhall Wood School. Pupils were spread across the age range 5 to 18.

### Disability:

In January 2018, all pupils on roll at Tettenhall Wood School had a Special Educational Need and/or Disability (SEND). 45 pupils had an Education, Care and Health Plan (EHCP), 60 pupils had a Statement of Special Educational Need and 6 pupils were identified as requiring SEN Support.

### Gender:

In January 2018, 96 pupils were male and 15 pupils were female.

### Ethnicity:

In January 2018, 48 pupils on roll at Tettenhall Wood 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 change proposals qualify as prescribed alterations which require 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.

Figure 1 below outlines the consultation and decision making process:

Figure 1: Consultation and Decision Making Process

| Date                                 | Process  |
|--------------------------------------|--|
| 14 May 2018 to 17 June 2018          | Pre-publication Consultation   |
| 17 July 2018                         | The Cabinet Member for Education and Skills, in consultation with the Director of Education; considered all outcomes of Pre-publication Consultation and approved progression to a period of Representation. |
| 10 September 2018 to 7 October 2018  | Representation Period.   |
| 21 November 2018                     | Cabinet consider all outcomes of consultation and make a final decision on the proposals.  |
| 27 November 2018 to 24 December 2018 | Appeals Period.  |
| 1 September 2019                     | Subject to approval, proposals are formally implemented.   |

### Pre-publication Consultation

Pre-publication Consultation ran from 14 May 2018 to 17 June 2018. During the Pre-publication Consultation period, more than 400 letters and consultation documents were distributed to stakeholders. Stakeholders included the Governing Board of Tettenhall Wood School, members of staff at Tettenhall Wood School, parents/carers of pupils attending Tettenhall Wood School and all schools in Wolverhampton.

During the Pre-publication Consultation period, 48 written responses were received by the City of Wolverhampton Council (as summarised in Figure 2). These were completed by a range of stakeholders including members of staff at Tettenhall Wood School, parents/carers of pupils attending Tettenhall Wood School and members of Tettenhall Wood School's Governing Board.

Figure 2: Written Responses Consultation Summary

| Consultation Question   | Number of Responses Received | Yes      | No      | Don't Know | Abstained |
|---|------------------------------|----------|---------|------------|-----------|
| a. Do you agree with the proposal to increase the capacity of Tettenhall Wood School? | 48                           | 34 (71%) | 6 (13%) | 7 (15%)    | 1 (2%)    |
| b. Do you agree with the proposal to extend the age range of Tettenhall Wood School?  | 48                           | 39 (81%) | 4 (8%)  | 3 (6%)     | 2 (4%)    |

Respondee Summary:

- Age: The age ranges of respondees to Pre-publication Consultation were 1 (Under 16), 5 (16-24), 11 (25-34), 12 (35-44), 9 (45-54), 5 (55-64), 2 (65+) and 3 (abstained).
- Gender: The genders of respondees to Pre-publication Consultation were 38 (female), 1 (gender neutral), 6 (male) and 3 (abstained).
- Gender Identity: 42 respondees to Pre-publication Consultation were identified as having the same gender identity as assigned at birth, 6 respondees abstained.
- Sexual Orientation: The sexual orientation of respondees to Pre-publication Consultation were 1 (Bi-sexual), 38 (Heterosexual) and 9 (abstained).
- Ethnic Origin: The ethnic origin of respondees to Pre-publication Consultation was 1 (Any Other), 3 (Asian or Asian British - Indian), 1 (Black or Black British - African), 1 (Black or Black British – Caribbean), 36 (White British), 1 (White – Other European), and 5 (abstained).
- Religion: The religion of respondees to Pre-publication Consultation was 20 (Christian), 3 (Muslim), 15 (No religion), 2 (Sikh) and 8 (abstained).

- Disability: 4 respondees to Pre-publication Consultation were identified as having a disability, 40 were identified as not having a disability, 1 was unsure and 3 respondees abstained.

### **Representation Period**

The Representation Period commenced on 10 September 2018 and concluded on 7 October 2018. At the start of the consultation period, a Statutory Notice was published in the Express and Star Newspaper and consultation documentation was published on the Council's website and distributed to relevant stakeholders.

The City of Wolverhampton Council did not receive any responses regarding the proposed changes to Tettenhall Wood School during the Representation Period.

### **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 proposals were received during Pre-publication Consultation including:

- "The Headteacher has discussed this with staff and explained how the curriculum will work and I think this will be a positive use of the proposed capital funding budget." (T10 – Member of the Governing Board of Tettenhall Wood School)
- "An excellent idea to increase the pupil capacity at Tettenhall Wood. Much needed." (T11 – Parent/Carer of a pupil at Tettenhall Wood School)
- "Would be a good thing for children to start at Reception age like primary schools." (T29 – Member of staff at Tettenhall Wood School)
- "I believe it would be beneficial for children with autism to start their school life here, instead of having to transition from another school." (T35 – Member of staff at Tettenhall Wood School)
- "Necessary to meet the need in the area. Younger children need consistent placement from the start of their education rather than having to move after a year or so." (T43 - Member of staff at Tettenhall Wood School).

A number of concerns and considerations regarding the proposals were also identified during Pre-publication Consultation including:

- "A more cost effective solution would be to open a free school." (T13 - Local Headteacher)
- "More spaces are needed for teaching, therapies and individual rooms. We currently do not have enough staff to meet the needs of some of the challenging pupils." (T31 - Member of staff at Tettenhall Wood School)
- "It really concerns me that by being in one school for their whole education will effectively institutionalise children and make transition to adult services even more difficult than it needs to be." (T38 - SEND Professional)
- "Increasing numbers would have to come with additional staffing and at a time when school budgets are stretched to breaking point, activities, outings etc get cancelled it would be hoped that sufficient funding can be put in place to support the senior leadership team in this expansion." (T45 – Parent/Carer of a pupil at Tettenhall Wood School and Member of the Governing Board of Tettenhall Wood School).

### Step 3 – Identifying the negative impact.

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

| <p><b>Barriers:</b></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"> <li>• <b>Where</b> you provide your service, e.g. the facilities/premises;</li> <li>• <b>Who</b> provides it, e.g. are staff trained and representative of the local population/users?</li> <li>• <b>How</b> 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?</li> <li>• <b>When</b> it is provided, e.g. opening hours?</li> <li>• <b>What</b> is provided, e.g. does the service meet everyone's needs? How do you know?</li> </ul> <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><b>Solutions:</b></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"> <li>• Other arrangements that can be made to ensure people's diverse needs are met;</li> <li>• How your actions might help to promote good relations between communities;</li> <li>• How you might prevent any unintentional future discrimination.</li> </ul> |                                      |                                      |   |
|--|--------------------------------------|--------------------------------------|---|
| Equality Themes  | Positive Impacts                     | Negative Impacts identified          | Solutions<br>(ways in which you could mitigate the negative impact) |
| <b>Age</b> (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.                                |

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| <b>Disability</b> (including carers)   | The proposals aim to better support the changing needs of the City's population with SEND, enable a wider range of pupils to benefit from the education and support provided by Tettenhall Wood School, and reduce the potential need for expensive out of City placements. | Concerns identified regarding the availability of appropriate accommodation to meet pupils' needs. | Not applicable – Capital investment to support the temporary changes to provision has ensured the delivery of appropriate accommodation. |
| <b>Gender</b> (men and women)  | The proposals aim to better support the changing needs of the City's population with SEND regardless of gender.   | Not applicable.  | Not applicable.  |
| <b>Race</b> (including Gypsies & Travellers and Asylum Seekers)  | The proposals aim to better support the changing needs of the City's population with SEND regardless of race.   | Not applicable.  | Not applicable.  |
| <b>Religion or belief</b> (including people of no religion or belief)  | The proposals aim to better support the changing needs of the City's population with SEND regardless of religion or belief.   | Not applicable.  | Not applicable.  |
| <b>Gender Re-assignment</b> (those that are going or have gone through a transition: male to female or female to male) | The proposals aim to better support the changing needs of the City's population with SEND regardless of gender re-assignment.   | Not applicable.  | Not applicable.  |
| <b>Pregnancy and Maternity</b>   | Not applicable.   | Not applicable.  | Not applicable.  |
| <b>Sexual orientation</b> (including gay, lesbian, bisexual and heterosexual)  | The proposals aim to better support the changing needs of the City's population with SEND regardless of sexual orientation.   | Not applicable.  | Not applicable.  |
| <b>Marriage and Civil Partnership</b>  | Not applicable.   | Not applicable.  | Not applicable.  |

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|---------------------|-----------------|-----------------|-----------------|
| <b>Human Rights</b> | Not applicable. | Not applicable. | Not applicable. |
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### 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.

### 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: 31.10.18