

Equality Analysis

Directorate: Education	Lead Officer: Tom Knott (SEND Commissioning Officer)
Service Area: Special Educational Needs and Disabilities	Date completed: 31 October 2018
Service / Function / Policy / Procedure to be assessed:	
Proposed establishment of a 12-place resource base for pupils with Hearing Impairments at Warstones Primary 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?

Warstones Primary School is a mainstream community primary school which does not currently house specialist provision for pupils with Special Educational Needs and Disabilities.

It is proposed that with effect from 1 September 2019, a 12-place resource base for pupils with Hearing Impairments is established at Warstones Primary School.

The establishment of resource base provision at Warstones Primary School would ensure the sufficiency of provision in the City, enable a wider range of pupils to benefit from the education and support provided by Warstones Primary School and address the existing demand issue with pupils leaving the City.

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?	To establish a 12 place resource base for pupils with Hearing Impairments at Warstones Primary School with effect from 1 September 2019.
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?	Warstones Primary 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 457 pupils on roll at Warstones Primary School. Pupils were spread across the age range 3 to 10.

Disability:

In January 2018, 59 pupils on roll at Warstones Primary School had a Special Educational Need and/or Disability (SEND) – the vast majority of these pupils were accessing SEN Support.

Gender:

In January 2018, 230 pupils were male and 227 pupils were female.

Ethnicity:

In January 2018, 252 pupils on roll at Warstones Primary 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 proposal qualifies as a prescribed alteration 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 700 letters and consultation documents were distributed to stakeholders. Stakeholders included the Governing Board of Warstones Primary School, members of staff at Warstones Primary School, parents/carers of pupils attending Warstones Primary School and all schools in Wolverhampton.

During the Pre-publication Consultation period, 36 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 Warstones Primary School, parents/carers of pupils attending Warstones Primary School and members of Warstones Primary School's Governing Board.

Figure 2: Written Responses Consultation Summary

Consultation Question	Number of Responses Received	Yes	No	Don't Know	Abstained
Do you agree with the proposal to establish a resource base for pupils with Hearing Impairments at Warstones Primary School, with effect from 1 September 2019?	36	32 (89%)	2 (6%)	1 (3%)	1 (3%)

Respondee Summary:

- Age: The age ranges of respondees to Pre-publication Consultation were 2 (16-24), 2 (25-34), 14 (35-44), 8 (45-54), 6 (55-64), and 4 (abstained).
- Gender: The genders of respondees to Pre-publication Consultation were 28 (female), 4 (male) and 4 (abstained).
- Gender Identity: 31 respondees to Pre-publication Consultation were identified as having the same gender identity as assigned at birth, 5 respondees abstained.
- Sexual Orientation: The sexual orientation of respondees to Pre-publication Consultation were 33 (Heterosexual) and 3 (abstained).
- Ethnic Origin: The ethnic origin of respondees to Pre-publication Consultation was 3 (Asian or Asian British - Indian), 1 (Asian or Asian British - Pakistani), 28 (White British), 1 (White and Black African) and 3 (abstained).
- Religion: The religion of respondees to Pre-publication Consultation was 15 (Christian), 1 (Hindu), 1 (Muslim), 14 (No religion), 2 (Sikh) and 3 (abstained).
- Disability: 4 respondees to Pre-publication Consultation were identified as having a disability, 29 respondees did not have a disability 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 change to Warstones Primary 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 proposal were received during Pre-publication Consultation including:

- "It is a great idea, I'm surprised there isn't more done for pupils with hearing impairments." (W17 – Parent of a pupil at Warstones Primary School)
- "Will definitely enhance the experience of all the children" (W20 – Member of staff at Warstones primary School)
- "I hope that the inclusion of hearing impaired children in the school will enrich the experience of my children currently attending the school, and hope that they will learn deaf awareness as well as some basic signing skills." (W23 - Parent/Carer of a pupil at Warstones Primary School)
- "A good fit, making use of both spare space and capable management to offer an important service to the community." (W28 - Parent/Carer of a pupil at Warstones Primary School)
- "This facility would fulfil a need in the city and improve overall facilities at Warstones Primary School." (W29 - Parent/Carer of a pupil at Warstones Primary School).

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

- "My concern for the School is additional parking facilities for the extra members of staff required for the Resource base." (W9 – Parent/Carer of a pupil at Warstones Primary School)
- "It is essential that some infrastructure changes take place first, in order to accommodate the extra children. This would need to be in the form of extra cloakrooms, toilets and staff/visitor parking as they are currently inadequate." (W12 – Member of staff at Warstones Primary School)
- "The school needs to make improvements in other areas first, then consider hearing impairment unit." (W18 - Parent/Carer of a pupil at Warstones Primary School).

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.
Disability (including carers)	The proposal would ensure the sufficiency of provision in the	Concerns identified regarding the need for additional facilities.	Not applicable – Representatives of the Corporate Landlord Service are

	City, enable a wider range of pupils to benefit from the education and support provided by Warstones Primary School and address the existing demand issue with pupils leaving the City.		working closely with school leaders to develop an appropriate capital scheme which would effectively enable the prescribed alteration and meet pupils' needs.
Gender (men and women)	The proposal aims to support the City's primary population with hearing impairments regardless of gender.	Not applicable.	Not applicable.
Race (including Gypsies & Travellers and Asylum Seekers)	The proposal aims to support the City's primary population with hearing impairments regardless of race.	Not applicable.	Not applicable.
Religion or belief (including people of no religion or belief)	The proposal aims to support the City's primary population with hearing impairments regardless of religion or belief.	Not applicable.	Not applicable.
Gender Re-assignment (those that are going or have gone through a transition: male to female or female to male)	The proposal aims to support the City's primary population with hearing impairments regardless of gender re-assignment.	Not applicable.	Not applicable.
Pregnancy and Maternity	Not applicable.	Not applicable.	Not applicable.
Sexual orientation (including gay, lesbian, bisexual and heterosexual)	The proposal aims to support the City's primary population with hearing impairments regardless of sexual orientation.	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.

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