



LBHF Equality Impact Analysis Tool

Conducting an Equality Impact Analysis

An EqIA is an improvement process which helps to determine whether our policies, practices, or new proposals will impact on, or affect different groups or communities. It enables officers to assess whether the impacts are positive, negative or unlikely to have a significant impact on each of the protected characteristic groups.

The tool has been updated to reflect the new public sector equality duty (PSED). The Duty highlights three areas in which public bodies must show compliance. It states that a public authority must, in the exercise of its functions, have due regard to the need to:

- 1. Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under this Act;**
- 2. Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;**
- 3. Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.**

Whilst working on your Equality Impact Assessment, you must analyse your proposal against the three tenets of the Equality Duty.

General points

1. In the case of matters such as service closures or reductions, considerable thought will need to be given to any potential equality impacts. Case law has established that due regard cannot be demonstrated after the decision has been taken. Your EIA should be considered at the outset and throughout the development of your proposal, it should demonstrably inform the decision, and be made available when the decision is recommended.
2. Wherever appropriate, the outcome of the EIA should be summarised in the Cabinet/Cabinet Member report and equalities issues dealt with and cross referenced as appropriate within the report.
3. Equalities duties are fertile ground for litigation and a failure to deal with them properly can result in considerable delay, expense and reputational damage.
4. Where dealing with obvious equalities issues e.g. changing services to disabled people/children, take care not to lose sight of other less obvious issues for other protected groups.
5. If you already know that your decision is likely to be of high relevance to equality and/or be of high public interest, you should contact the Equality Officer for support.
6. Further advice and guidance can be accessed from the separate guidance document (link), as well as from the Opportunities Manager: PEIA@lbhf.gov.uk or ext 3430

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Overall Information	Details of Full Equality Impact Analysis
Financial Year and Quarter	13/14 / Q2
Name and details of policy, strategy, function, project, activity, or programme	<p>Title of EIA: Proposed discontinuance of Sullivan Primary School and enlargement of New King's Primary School.</p> <p>State whether new or existing: New</p> <p>Short summary:</p> <p>Due to the ongoing spare capacity of places in primary schools and to increase the quality and efficiency of schools for parents in the south of Fulham, a consultation on the discontinuance of Sullivan Primary School and enlargement of New King's Primary School has been undertaken. The Council believes this will reduce the number of spare primary places, lead to enhanced educational opportunities and outcomes for children through better economies of scale and provide an opportunity for capital investment in better school facilities for the benefit of children and parents in Fulham.</p>
Lead Officer	<p>Name: Alan Wharton</p> <p>Position: Tri-borough Head of Asset Strategy</p> <p>Email: awharton@westminster.gov.uk</p>
Date of completion of final EIA	10/1/2014

Section 02	Scoping of Full EIA
Plan for completion	<p>Timing: The Consultation period has expired and the 6 weeks' statutory notice period ended on 11 December 2013. The outcomes are included in the report to Cabinet for 20 January 2014. .</p>

Analyse the impact of the policy, strategy, function, project, activity, or programme

Analyse the impact of the project on the protected characteristics (including where people / groups may appear in more than one protected characteristic). You should use this to determine whether the policy will have a positive, neutral or negative impact on equality, giving due regard to relevance and proportionality.

Protected characteristic	Analysis	Impact: Positive, Negative, Neutral
Age	The related proposals to discontinue and enlargewill result in no difference to the age range of pupils attending the new school.	Neutral
Disability	<p>For the purpose of this equality impact assessment children with Special Educational Needs and/or disabilities (SEND) have been considered together on the basis that having special needs is a reasonable proxy of having a disability.</p> <p>The Council’s data contains the following information in respect of pupils with SEND. The data reported was current as of January 2013. Whilst the numbers have changed slightly since then; the analysis of that data is more complete than the analysis of the statistics for October 2013. Overall the data is considered indicative of the likely on-going pattern of SEND.</p> <p><u>Sullivan School</u></p> <p>39 pupils with a Statement of SEN or subject to School Action Plus. This represents 13.4% of 292 pupils. 11 had speech, language and communications needs, 19 had a specific learning difficulty, 2 had Autism Spectrum Disorder (ASD) and 2 had a physical disability.</p> <p><u>New King’s School</u></p> <p>26 pupils with a Statement of SEN or subject to School Action Plus. This represents 12.3% of 212 pupils. 14 had speech, language and communications needs.</p>	

		<p>Currently there is one pupil with a hearing impairment identified as a primary area of need, at New King's Primary School.</p> <p>The proposals have, as relevant, two aspects: the temporary move to Sullivan and the final move to New King's site. Each is considered in turn.</p> <p><u>(1) Temporary expansion of Sullivan site</u></p> <p><u>(a) Children with Autistic Spectrum Disorder (ASD)</u></p> <p>The proposals could put pupils with ASD at a particular disadvantage because discomfort with change is commonly associated with ASD.</p> <p>Therefore, support will be given to pupils with ASD at Sullivan, primarily from their Learning Support Assistants (LSAs) and their teachers, to prepare for the changes associated with the move of all New King's pupils on to the Sullivan site where they are based in September 2014.</p> <p>Consideration will be given to organisation of the environment of the temporary school site to maximise the capacity of pupils with ASD to maintain continuity of access to learning and management of social situations. This will include clear visual cues for areas of the school reflecting the specific use of designated areas (for example, classrooms, dining hall, library). Provision will include, for example, work spaces and/or areas within classrooms for those students for whom reduced sensory overload is a preferred environment for learning and sufficient circulation space to avoid congestion and over-crowding during unstructured, break periods.</p> <p>It is noted that there were at January 2013 no New King's pupils with ASD, However the prevalence of ASD is such that it would be expected that all schools have at least one pupil with this condition now or in the future. The above adaptations will benefit pupils who attend New King's School and may have social communication difficulties and/or similar presenting needs to those with a diagnosis of autism.</p>	Neutral
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	<p>In managing the transition to temporary school arrangements and the development of the new expanded New Kings School expert advice will be provided through outreach from the local ASD Special School, Queensmill.</p> <p><u>(b) Children with physical disabilities</u></p> <p>Children with physical disabilities would not be affected by the temporary move to the Sullivan site, as there are no New King’s pupils with physical disabilities who are due to move to Sullivan. The two Sullivan pupils with physical disabilities would remain on site in September 2014 and their access to the curriculum and to the facilities at Sullivan would remain the same as they are now.</p> <p><u>(c) Children with communications difficulties</u></p> <p>There will be acoustic adjustments to some classrooms and communal spaces (hall, dining room) at the interim site to provide the same level of infrastructure as currently exists at New King’s School for pupils with a hearing impairment. These adjustments may also benefit children with speech, language and communication by improving the listening environment and as a consequence supporting attention and comprehension of spoken curriculum delivery.</p> <p><u>(d) Children with specific learning difficulties</u></p> <p>There are not expected to be any adverse effects for pupils with specific learning difficulties.</p> <p><u>(2) Final move to New King’s site</u></p> <p><u>(a) Children with ASD</u></p> <p>Initially the proposals may put pupils with ASD at a particular disadvantage because discomfort with change is commonly associated with ASD.</p> <p>Therefore, advance visits to the permanent New King’s site will be undertaken for all pupils with ASD, supported by their LSAs and their teachers, to help them</p>	<p>Positive</p>
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prepare for a successful transition to the new site for September 2015.

At the permanent site, full consideration will be given to organisation of the environment of the new school to maximise the capacity of pupils with ASD to access to learning and management of social situations. This will include clear visual cues for areas of the school reflecting the specific use of designated areas (for example, classrooms, dining hall, library). Provision will include work spaces and/or areas within classrooms for those students for whom reduced sensory overload is a preferred environment for learning and sufficient circulation space to avoid congestion and over-crowding during unstructured, break periods.

(b) Children with physical disabilities

During the consultation process, concern was expressed about the impact of the proposal and the potential closure on the small number of disabled pupils at Sullivan School, for whom the Sullivan site is said to be ideally suited. The Council proposes the following improvements in provision for pupils with a physical disability:

- New lifts will be installed as part of the New King's expansion works to ensure that the school will be fully accessible to all children on all main floors
- Improvements to internal layout
- each main floor will be provided with an accessible toilet

Therefore children with physical disabilities should not be disadvantaged by the end result of the proposals.

(c) Children with communications difficulties

Acoustic adjustments will be made at the permanent site which equal or exceed the current infrastructure to support children with hearing impairment and/or those with speech, language and communication difficulties regulate attention to maximise their potential for attending to and understanding oral curriculum

		<p>delivery.</p> <p>(d) <u>Children with specific learning difficulties</u></p> <p>There are not expected to be any adverse effects for pupils with specific learning difficulties.</p> <p>(e) <u>All children with special educational needs</u></p> <p>The plans for expansion of the New Kings School include appointment of three specialist teachers to lead intervention for children with special educational needs. This is expected to enhance the quality of the local offer of provision for these children.</p>	
	Gender reassignment	There is no expected impact specific to this characteristic.	Neutral
	Marriage and Civil Partnership	There is no expected impact specific to this characteristic.	Neutral
	Pregnancy and maternity	There is no expected impact specific to this characteristic.	Neutral
	Race	Our analysis of the consultation responses and representations thus far have not indicated that there will be any concerns in this area. It is noted that most pupils at both schools are from a minority ethnic heritage. The most recent Ofsted reports for both schools show that children from minority ethnic groups make good or better than expected progress and that both schools effectively meet the needs of a diverse community. It is not expected that the amalgamation proposal would have a negative impact on pupils by virtue of their race.	Neutral
	Religion/belief (including non-belief)	The Council recognises the concerns expressed during consultation process by parents as well as both the London Diocesan Board for Schools and the local Mosque who value Sullivan School as a school for children of all faiths and no faith. They consider that none of the alternative models supported by the Council	Positive

		enhance this cohesiveness but rather tend to undermine and ignore it. However, given that two secular schools will merge to form one secular school, no adverse impact is foreseen on pupils of a particular religion/belief or on pupils of no religion/belief.	
	Sex	Our analysis thus far has not indicated that there will be any impact in this area. There will no change proposed to the composition of either school.	Positive
	Sexual Orientation	There is no expected impact specific to this characteristic.	Neutral
<p>Human Rights or Children’s Rights</p> <p>If your decision has the potential to affect Human Rights or Children’s Rights, please contact your Equality Lead for advice</p> <p>Will it affect Human Rights, as defined by the Human Rights Act 1998? No</p> <p>Will it affect Children’s Rights, as defined by the UNCRC (1992)? No</p>			

Section 03	Analysis of relevant data Examples of data can range from census data to customer satisfaction surveys. Data should involve specialist data and information and where possible, be disaggregated by different equality strands.
Documents and data reviewed	Statistical data cited above and the reports to Cabinet Members on 8 July 2013 and 17 October 2013.
New research	No new research required.

Section 04	Consultation
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Consultation	A wide-ranging consultation was carried out prior to publication of the proposals. The consultation period was extended to 12 weeks, from 16 July to 10 September 2013. The statutory notice period, during which representations could be submitted, expired on 11 th December. A full summary of both the consultation responses and representations received during the statutory notice period, along with the actual consultation responses and representations from both New King's and Sullivan will be reported to Cabinet on 20 January 2014.
Analysis of consultation outcomes	Both the consultation responses and the representations received during the statutory notice period have been fully analysed and summary reports are attached to the Cabinet Report for 20 January 2014.

Section 05	Analysis of impact and outcomes
Analysis	This is set out in Section 2 above and is not repeated here.

Section 06	Reducing any adverse impacts and recommendations
Outcome of Analysis	The action plan below is aimed at mitigating the adverse impacts on disabled pupils.

Section 07		Action Plan			
Issue Identified	Action(s) to be taken	When	Lead Officer and Borough	Expected Outcome	Date added to business/service plan
1. Children with ASD experience discomfort with change. Children with ASD find change challenging and are sometimes	Pupils with ASD at Sullivan will be supported by their TAs in preparing for the change of New King's pupils coming on-site in September 2014 and then will be supported through advance visits to the new permanent site to help ensure a successful transition.	As a result of re-location of New King's School to the Sullivan site in September 2014, and following the refurbishment of	Alison Farmer, Tri-Borough Assistant Director for SEN and Vulnerable Children	No significant negative effects on learning for any group and specifically those children with SEND is expected as a consequence of the proposed school changes. Plans have been	Current

<p>overwhelmed by the sensory experience of school.</p>		<p>New King's School for September 2015</p>		<p>made to mitigate the impact on children with SEND. Overall it is considered that the proposals improve the local offer of provision for children with SEND and are educationally advantageous for all pupils, including those with SEND.</p>	
<p>2. Children with communication difficulties at New King's might be disadvantaged by the current acoustic arrangements at Sullivan compared with those at New King's.</p> <p>Children at New Kings with hearing impairment (there is one child with a statement of SEN who has hearing impairment as a primary area of need) currently have a school environment with acoustic treatment .</p>	<p>Interim accommodation at Sullivan School will provide an acoustic environment equivalent to that currently at New King's for pupils with a hearing impairment.</p> <p>The expanded New Kings School will have acoustic treatment in some classrooms and open areas to the equivalent or greater level than the current building. This is expected to improve the learning environment provision for children with speech, language and communication needs in addition to those with hearing impairment.</p>	<p>As a result of re-location of New King's School to the Sullivan site in September 2014, and following the refurbishment of New King's School for September 2015</p>	<p>Alison Farmer, Tri-Borough Assistant Director for SEN and Vulnerable Children</p>	<p>No significant negative effects on learning for any group and specifically those children with SEND is expected as a consequence of the proposed school changes. Plans have been made to mitigate the impact on children with SEND. Overall it is considered that the proposals improve the local offer of provision for children with SEND and are educationally advantageous for all pupils, including those with SEND.</p>	<p>Current</p>
<p>3. Children with physical disabilities at</p>	<p>The design and organisation of the temporary school and expanded New</p>	<p>As a result of re-location of New</p>	<p>Alison Farmer, Tri-Borough</p>	<p>No significant negative effects on learning for any</p>	

<p>Sullivan School might be disadvantaged by the physical arrangements at New King's.</p> <p>The Local Authority plans to increase accessible school provision.</p>	<p>Kings School will include visual cues to support children with ASD and others in recognising the use of different parts of the building.</p>	<p>King's School to the Sullivan site in September 2014, and following the refurbishment of New King's School for September 2015</p>	<p>Assistant Director for SEN and Vulnerable Children</p>	<p>group and specifically those children with SEND is expected as a consequence of the proposed school changes. Plans have been made to mitigate the impact on children with SEND. Overall it is considered that the proposals improve the local offer of provision for children with SEND and are educationally advantageous for all pupils, including those with SEND.</p>	<p>Current</p>
<p>(No. 3 cont...)</p>	<p>Workstations will be provided for children with ASD as appropriate.</p>	<p>As a result of re-location of New King's School to the Sullivan site in September 2014, and following the refurbishment of New King's School for September 2015</p>	<p>Alison Farmer, Tri-Borough Assistant Director for SEN and Vulnerable Children</p>	<p>No significant negative effects on learning for any group and specifically those children with SEND is expected as a consequence of the proposed school changes. Plans have been made to mitigate the impact on children with SEND. Overall it is considered that the proposals improve the local offer of provision for children with SEND and are educationally advantageous for all pupils, including those with SEND.</p>	<p>Current</p>
<p>(No. 3 cont...)</p>	<p>To ensure interim school buildings are accessible, proportionate building work</p>	<p>As a result of re-location of New King's School to</p>	<p>Alison Farmer, Tri-Borough Assistant</p>	<p>No significant negative effects on learning for any group and specifically those</p>	<p>Current</p>

	(e.g. door widths, ramps, etc) will be undertaken at the temporary school	the Sullivan site in September 2014, and following the refurbishment of New King’s School for September 2015	Director for SEN and Vulnerable Children	children with SEND is expected as a consequence of the proposed school changes. Plans have been made to mitigate the impact on children with SEND. Overall it is considered that the proposals improve the local offer of provision for children with SEND and are educationally advantageous for all pupils, including those with SEND.	
(No. 3 cont...)	The design of New King’s School, through the provision of two new lifts, will ensure that the building is fully accessible for pupils with a physical disability.	As a result of re-location of New King’s School to the Sullivan site in September 2014, and following the refurbishment of New King’s School for September 2015	Alison Farmer, Tri-Borough Assistant Director for SEN and Vulnerable Children	No significant negative effects on learning for any group and specifically those children with SEND is expected as a consequence of the proposed school changes. Plans have been made to mitigate the impact on children with SEND. Overall it is considered that the proposals improve the local offer of provision for children with SEND and are educationally advantageous for all pupils, including those with SEND.	Current
4. Ensuring adequate and effective provision for pupils with SEND so	The New Kings School plan indicates three specialist teachers will be employed to deliver interventions.	As a result of re-location of New King’s School to the Sullivan site in	Alison Farmer, Tri-Borough Assistant Director for	No significant negative effects on learning for any group and specifically those children with SEND is	Current

that they make good educational progress.	It is expected that this will provide an enhanced local offer and improved quality of provision for children with learning difficulties.	September 2014, and following the refurbishment of New King's School for September 2015	SEN and Vulnerable Children	expected as a consequence of the proposed school changes. Plans have been made to mitigate the impact on children with SEND. Overall it is considered that the proposals improve the local offer of provision for children with SEND and are educationally advantageous for all pupils, including those with SEND.	
Section 08	Agreement, publication and monitoring				
Chief Officers' sign-off	Name: Ian Heggs Position: Director of Schools Commissioning Email: ian.heggs@lbhf.gov.uk Telephone No: 020 8753 2883				
Key Decision Report (if relevant)	Date of report to Cabinet: 20/01/2014 Key equalities issues have been included: Yes				
Opportunities Manager (where involved)	N/A				