

## Appendix 4

# Equality Impact Assessment / Equality Analysis

<b>Title of service or policy</b>	The Future of Culverhay School
<b>Name of directorate and service</b>	Children's Services
<b>Name and role of officers completing the EIA</b>	Helen Hoynes, Children's Services and School Organisation Manager
<b>Date of assessment</b>	27 <sup>th</sup> June 2011

Equality Impact Assessment (or 'Equality Analysis') is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on different groups within the community. The primary concern is to identify any discriminatory or negative consequences for a particular group or sector of the community. Equality impact Assessments (EIAs) can be carried out in relation to service delivery as well as employment policies and strategies.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EIA) or Equality Analysis on a policy, service or function. It is intended that this is used as a working document throughout the process, with a final version including the action plan section being published on the Council's and NHS Bath and North East Somerset's websites.

<b>1. Identify the aims of the policy or service and how it is implemented.</b>		
	<b>Key questions</b>	<b>Answers / Notes</b>
<b>1.1</b>	Briefly describe purpose of the service/policy including <ul style="list-style-type: none"> <li>● How the service/policy is delivered and by whom</li> <li>● If responsibility for its implementation is shared with other departments or organisations</li> <li>● Intended outcomes</li> </ul>	Keep a co-educational school on the Culverhay school site  Culverhay school Governing Body and the LA  NA  To provide a financially viable school with good educational standards that delivers good educational outcomes for its pupils.
<b>1.2</b>	Provide brief details of the scope of the policy or service being reviewed, for example: <ul style="list-style-type: none"> <li>● Is it a new service/policy or review of an existing one?</li> <li>● Is it a national requirement?).</li> <li>● How much room for review is there?</li> </ul>	Existing proposal to close Culverhay school and new consideration of a co-educational school on the site  No Unknown

1.3	Do the aims of this policy link to or conflict with any other policies of the Council?	No
<b>2. Consideration of available data, research and information</b>		
<p>Monitoring data and other information should be used to help you analyse whether you are delivering a fair and equal service. Please consider the availability of the following as potential sources:</p> <ul style="list-style-type: none"> <li>● <b>Demographic</b> data and other statistics, including census findings</li> <li>● Recent <b>research</b> findings (local and national)</li> <li>● Results from <b>consultation or engagement</b> you have undertaken</li> <li>● Service user <b>monitoring data</b> (including ethnicity, gender, disability, religion/belief, sexual orientation and age)</li> <li>● Information from <b>relevant groups</b> or agencies, for example trade unions and voluntary/community organisations</li> <li>● Analysis of records of enquiries about your service, or <b>complaints</b> or <b>compliments</b> about them</li> <li>● Recommendations of <b>external inspections</b> or audit reports</li> </ul>		
	<b>Key questions</b>	<b>Data, research and information that you can refer to</b>
2.1	What is the equalities profile of the team delivering the service/policy?	Unknown
2.2	What equalities training have staff received?	Basic equalities awareness training
2.3	What is the equalities profile of service users?	<p>October 2010 School Census: numbers of pupils on roll, age, ethnicity, gender, Special Educational Needs, eligibility for free school meals, Virtual Schools report on the number of Children in Care, Indices of Multiple Deprivation (IMD) 2010.</p> <p>Admissions and Transport data showing pupils that live within the Greater Bath Consortium area and those that live elsewhere.</p> <p>Virtual Schools report on the number of children in care.</p> <p>B&amp;NES PCT data on births and resident population</p>

2.4	What other data do you have in terms of service users or staff? (e.g results of customer satisfaction surveys, consultation findings). Are there any gaps?	Consultation findings.
2.5	What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?	<p>Yes - details of consultation as follows</p> <p>Public consultation meetings were held at the school on Thursday 14<sup>th</sup> October and at the Guildhall on Wednesday 20<sup>th</sup> October 2010. Meetings were also held with the school staff and the school Governing Body</p> <p>Approximately 13,000 copies of the printed consultation document were circulated.</p> <p>Printed copies of the consultation document outlining the proposal and the process and timescale etc. of the consultation and the next stages were delivered to Culverhay sufficient for every member of staff (teaching and non-teaching), every member of the Governing Body and every pupil to have a copy. The school was asked to distribute the documents to the members of the Governing Body, all staff and to every pupil to take a copy home with them to reach pupils, parents and carers. Printed copies were also provided specifically for the members of the School Council for consultation with pupils.</p> <p>Printed copies of the consultation document were also delivered to all other secondary schools, to all primary schools and to the two Special schools in the Greater Bath Consortium area sufficient for every pupil to have a copy and schools were asked to distribute the documents to every pupil to take a copy home with them to reach pupils, parents and carers. These schools also had a copy for the Headteacher and a copy for the Chair of Governors.</p> <p>All other secondary schools, primary schools and the other Special school in Bath &amp; North East Somerset were sent two copies of the document, one for the Headteacher and one for the Chair of Governors.</p> <p>A printed copy was given to the three organisations that have a contractual use of the school site – Aquaterra Leisure, Bath Spa University and Foot Steps Nursery - and to nine other local and community groups that currently use the school facilities as identified by the school.</p> <p>A printed copy was posted to all neighbouring Local Authorities, to the two</p>

		<p>MPs for Bath &amp; North East Somerset and Bath, to all Bath &amp; North East Somerset Councillors, to all Parish Councils covering the Greater Bath Consortium area and to all libraries. 5 copies were distributed to DAFBY (Democratic Action for B&amp;NES Youth), 10 copies were distributed to the Schools Forum and 10 to the Admissions Forum.</p> <p>An electronic copy was sent to the local Roman Catholic Church diocese and to the Church of England diocese, to the Learning and Skills Council/Shared Service representative (and to the Young People's Learning Agency), to the Children and Young People Overview and Scrutiny Panel, to selected Bath &amp; North East Somerset Council teams and other named Council officers, to named Directors and to the Chief Executive. An email with a link to the electronic consultation document was sent to all designated Union representatives.</p> <p>Extra printed copies were also taken to the public consultations meetings for distribution on request. The printed document contained a detachable consultation response form.</p> <p>The consultation document was also made available electronically on the Council website and an electronic consultation response system was set up to allow stakeholders to read the document on line and submit a response via this method if they wished. This electronic response facility was mentioned in the paper consultation document as another way in which comments could be submitted. Stakeholders could also submit their comments via letter or email.</p> <p>As well in printed paper and electronic format on the Council website, the consultation document could be made available in alternative formats such as Braille, on tape, large print and in a range of community languages on request. Consultees were provided with a telephone number and email address to contact to request an alternative format. Consultees could also attend the meetings.</p> <p>47% were in support and 53% opposed the Council's approach to addressing the challenges in Bath which includes reducing the numbers of schools from seven to six. A significant majority (74%) were opposed to the proposal to close Culverhay with 26% in favour. In addition to the formal consultation responses a petition with approximately 2400</p>
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		<p>signatures was received supporting a change to co-educational status for Culverhay. A total of 143 signed leaflets supporting Culverhay as a co-educational school were also received.</p> <p>The Friends of Culverhay Parent Action Group also provided evidence of a survey undertaken of parents at local primary schools which asked if they would send their children to Culverhay if it were co-educational. Approximately 350 copies of the survey were received of which 183 were signed. Counting all responses including those unsigned this indicated that parents of a potential 535 pupils (310 boys and 225 girls) would choose Culverhay if it was co-educational, although it was not possible to accurately identify the children's ages and therefore the number who might attend at any one time.</p> <p>The statutory notice was published in The Bath Chronicle and posted outside all of the school entrances and placed in the window of the Co-operative supermarket in the Mount Road shopping area nearby. A copy of the complete proposal and statutory notice was given to the Culverhay Governing Body and to the Headteacher, the local C of E Diocese, the local RC Diocese, other neighbouring Local Authorities, the Young People's Learning Agency and the Secretary of State. The notice and the complete proposal were also placed on the Council website and the web address was printed in the statutory notice.</p> <p>The notice stated that comments or objections needed to be submitted within six weeks of the publication date and that they should be sent to the Local Authority. Representations could also be submitted by email. During the representation period a total of 41 representations were received. These were submitted by a range of stakeholders including parents of pupils at the school, pupils, school staff, the Governing Body, primary age pupils, local residents and local Councillors. The equalities profile of the respondents is not known. These representations were against the closure of the school and in support of keeping a school on this site.</p> <p>Specific equalities issues raised were in relation to pupils with Special Educational Needs (SEN), provision of church school places, increased</p>
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		travel distances and costs for some pupils, new uniform costs and underlying socio-economic disadvantage due to the area of the city where many Culverhay pupils live.				
2.6	If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equalities considerations within this?	Equalities impact assessments will be carried out as necessary.				
<b>3. Assessment of impact: 'Equality analysis'</b>						
	Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy: <ul style="list-style-type: none"> <li>• Meets any particular needs of equalities groups or helps promote equality in some way.</li> <li>• Could have a negative or adverse impact for any of the equalities groups</li> </ul>					
		<table border="1"> <thead> <tr> <th data-bbox="913 711 1417 846"><b>Examples of what the service has done to promote equality</b></th> <th data-bbox="1423 711 1927 846"><b>Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this</b></th> </tr> </thead> <tbody> <tr> <td data-bbox="913 850 1417 1351"> <p>3.1 <b>Gender</b> – identify the impact/potential impact of the policy on women and men. (Are there any issues regarding pregnancy and maternity?)</p> </td> <td data-bbox="1423 850 1927 1351"> <p>Possibility of Culverhay becoming co-educational/a co-education school opening on this site.</p> <p>If the school was to stay open and become co-ed this would result in the loss of boys places. However there would be other places available for boys in the city both at one single sex school and at four other co-educational schools. As Oldfield is to become co-educational in September 2012, if Culverhay was to stay open as a boys school for another year until 2013, there would be an imbalance of girls and boys places as there would be two boys schools providing 264 Year 7 places but only one girls school with 180 Year 7 places in the city. Equality of access to single sex places for boys and girls</p> </td> </tr> </tbody> </table>	<b>Examples of what the service has done to promote equality</b>	<b>Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this</b>	<p>3.1 <b>Gender</b> – identify the impact/potential impact of the policy on women and men. (Are there any issues regarding pregnancy and maternity?)</p>	<p>Possibility of Culverhay becoming co-educational/a co-education school opening on this site.</p> <p>If the school was to stay open and become co-ed this would result in the loss of boys places. However there would be other places available for boys in the city both at one single sex school and at four other co-educational schools. As Oldfield is to become co-educational in September 2012, if Culverhay was to stay open as a boys school for another year until 2013, there would be an imbalance of girls and boys places as there would be two boys schools providing 264 Year 7 places but only one girls school with 180 Year 7 places in the city. Equality of access to single sex places for boys and girls</p>
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			would be re-instated once Culverhay became co-ed. The remaining single sex boys school is located towards the centre of the city, ensuring equality of access to all pupils living in the Greater Bath Consortium (GBC) area. The single sex girls school is also located in about the same area. Girls living in this SW area of the city currently have to travel out of the immediate area to access a school place and therefore the travel distances for boys and girls would be of a similar length once Culverhay became co-ed.
<b>3.2</b>	<b>Transgender</b> – identify the impact/potential impact of the policy on transgender people	NA	None
<b>3.3</b>	<b>Disability</b> - identify the impact/potential impact of the policy on disabled people (ensure consideration of a range of impairments including both physical and mental impairments)	According to the October 2010 School Census there are a total of 84 pupils with statements of SEN in all Bath secondary schools, average 12. Culverhay has 9 statemented pupils but has a higher proportion of pupils with SEN in general than other schools in Bath.	All schools in Bath are capable of effectively supporting pupils with SEN. Culverhay is not the designated Accessible School for disabled pupils in Bath – this is Ralph Allen.
<b>3.4</b>	<b>Age</b> – identify the impact/potential impact of the policy on different age groups	Possible negative educational impact on all pupils aged 11 – 19.	The sixth form at Culverhay is quite small (65 pupils) and therefore maintaining a broad curriculum for post 16 pupils if the school stays open will be challenging. The school is likely to be small and therefore effective curriculum delivery will be challenging. The ability to effectively meet the needs of a range of abilities within what might possibly be a single year group and single class of 30



			pupils or less will require careful consideration and planning.
3.5	<b>Race</b> – identify the impact/potential impact on different black and minority ethnic groups	NA	According to the October 2010 School Census, within all Bath secondary schools the average of pupils who's ethnicity is recorded as being other than White British is 12.12%. At Culverhay it is 6.3%.
		<b>Examples of what the service has done to promote equality</b>	<b>Examples of potential negative or adverse impact and what steps have been or could be taken to address this</b>
3.6	<b>Sexual orientation</b> - identify the impact/potential impact of the policy on lesbians, gay, bisexual & heterosexual people	NA	None
3.7	<b>Religion/belief</b> – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.	NA	None
3.8	<b>Socio-economically disadvantaged</b> – identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances	A school could remain on this site.	The IMD 2010 shows that the socio-economic profile of the area of Bath surrounding Culverhay ranges from the most deprived 20% (Twerton ward and the northern part of Southdown ward) to the least deprived 20% (part of Southdown ward and the southern part of Westmoreland ward and the northern part of Odd Down ward). According to the October School Census the average eligibility for free school meals in all Bath secondary schools is 10.62%. At Culverhay it is 21.5%.
3.9	<b>Rural communities</b> – identify the impact /	NA	None

	potential impact on people living in rural communities		
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#### 4. Bath and North East Somerset Council & NHS B&NES Equality Impact Assessment Improvement Plan

Please list actions that you plan to take as a result of this assessment. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. The actions need to be built into your service planning framework. Actions/targets should be measurable, achievable, realistic and time framed.

Issues identified	Actions required	Progress milestones	Officer responsible	By when
If Culverhay stays open, need to ensure delivery of a broad and balanced curriculum and effective curriculum delivery in order to achieve good educational outcomes for all pupils.	Support the Governing Body and Headteacher to commission effective strategic curriculum planning support.	Review requirements for additional support with GB/Headteacher	Tony Parker (Divisional Director) and Lin Bartlett. (Senior Secondary Advisor)	September 2011
If Culverhay stays open, need to consider the gender imbalance.	Support the Governing Body to plan and undertake a Consultation on the School becoming co-educational at the earliest opportunity.	Plan for consultation in place  Undertake Consultation	Tony Parker (Divisional Director Learning and Inclusion).  Tony parker if Local Authority consultation. School or	September 2011.  Autumn 2011 onwards

			Academy if School or Academy undertaking consultation	
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## 5. Sign off and publishing

Once you have completed this form, it needs to be 'approved' by your Divisional Director or their nominated officer. Following this sign off, send a copy to the Equalities Team ([equality@bathnes.gov.uk](mailto:equality@bathnes.gov.uk)), who will publish it on the Council's and/or NHS B&NES' website. Keep a copy for your own records.

**Signed off by:** A G Parker

(Divisional Director or nominated senior officer)

**Date:** 30/6/11