

General Equality Impact Assessment (EIA) Form

Support:

An [EIA toolkit](#), [workshop content](#), and guidance for completing an [Equality Impact Assessment \(EIA\) form](#) are available on the [EIA page](#) of the [EDI Internal Hub](#). Please read these before completing this form.

For enquiries and further support if the toolkit and guidance do not answer your questions, contact your Equality, Diversity, and Inclusion (EDI) Business Partner as follows:

- Economy, Environment and Culture (EEC) – [Chris Brown](#),
- Families, Children, and Learning (FCL) – [Jamarl Billy](#),
- Governance, People, and Resources (GPR) – [Eric Page](#).
- Health and Adult Social Care (HASC) – [Zofia Danin](#),
- Housing, Neighbourhoods, and Communities (HNC) – [Jamarl Billy](#)

Processing Time:

- EIAs can take up to 10 business days to approve after a completed EIA of a good standard is submitted to the EDI Business Partner. This is not considering unknown and unplanned impacts of capacity, resource constraints, and work pressures on the EDI team at the time your EIA is submitted.
- If your request is urgent, we can explore support exceptionally on request.
- We encourage improved planning and thinking around EIAs to avoid urgent turnarounds as these make EIAs riskier, limiting, and blind spots may remain unaddressed for the 'activity' you are assessing.

Process:

- Once fully completed, submit your EIA to your EDI Business Partner, copying in your Head of Service, Business Improvement Manager (if one exists in your directorate), Equalities inbox, and any other relevant service colleagues to enable EIA communication, tracking and saving.
- When your EIA is reviewed, discussed, and then approved, the EDI Business Partner will assign a reference to it and send the approved EIA form back to you with the EDI Manager or Head of Communities, Equality, and Third Sector (CETS) Service's approval as appropriate.
- Only approved EIAs are to be attached to Committee reports. Unapproved EIAs are invalid.

Assessment details

Throughout this form, 'activity' is used to refer to many different types of proposals being assessed.

Read the [EIA toolkit](#) for more information.

| | |
|---|---|
| Name of activity or proposal being assessed: | Ceasing to maintain Homewood College |
| Directorate: | Families, Children and Learning |
| Service: | Education and Skills |
| Team: | School Organisation |
| Is this a new or existing activity? | New |

| | |
|--|---|
| Are there related EIAs that could help inform this EIA? Yes or No (If Yes, please use this to inform this assessment) | YES – related EIAs include St Peters and St Barts school closures |
|--|---|

Contributors to the assessment (Name and Job title)

| | |
|--|--|
| Responsible Lead Officer: | Richard Barker, Head of School Organisation |
| Accountable Manager: | Jo Lyons, Assistant Director, Education and Skills, Families, Children and Learning Department |
| Additional stakeholders collaborating or contributing to this assessment: | Heath, SEN and Disability Branch Managers Human Resources Team Finance Team |

About the activity

Briefly describe the purpose of the activity being assessed:

| |
|---|
| <p>As the Council now has ‘in principle’ agreement for Ministers to revoke the Academy Order on Homewood College, we are seeking consent from Members to consult on the closure of the school.</p> <p>Staff and families have recently been consulted on proposals linked to the council de-commissioning the places at Homewood College from September 2024. The expectation is that staff who are not redeployed will be made redundant from their current roles on 31 August.</p> <p>The Council is in the process of sourcing alternative placements for the 23 pupils who will need placements for September 2024.</p> <p>Background</p> <p>Homewood College is a small special school that has been in ‘special measures’ for over two years and which continues to provide an inadequate quality of education for its pupils. The last two monitoring reports from Ofsted have concluded that the school is not making adequate progress to improve.</p> <p>All pupils at the school are of secondary age and have Education, Health and Care Plans. Overall attendance this academic year has averaged 49%. The school has also amassed a very significant and escalating budget overspend, primarily on account of numbers of supply staff needed to cover high levels of absence amongst staff and a falling pupil roll. The budget out-turn for 2023-24 was £709,000. The last two monitoring visits by Ofsted in July and then December 2023 have found progress to be unsatisfactory.</p> <p>As a result of the school becoming subject to ‘special measures’ after a Section 5 Ofsted inspection in December 2021, it also became subject to an Academy Order, although no Academy Trust has come forward subsequently to sponsor the school. The Council cannot close a maintained school that is subject to an Academy Order and the Academy Order can only be revoked by the Secretary of State. However, ‘in principle’ agreement has been received that the Academy Order will be revoked, subject to final confirmation of adequate alternative arrangements for pupils.</p> <p>Subject to a final decision by the Secretary of State to revoke the Academy Order, the Council is proposing to consult on a decision to close the school, having found alternative provision of higher quality for the existing pupils and for pupils due to join the school in September 2024. The council is also involved in a major re-design of SEMH provision as part of the national SEND an AP programme and plans a significant uplift in available provision, with a greater focus on inclusivity.</p> <p>A new provision in the city for pupils in Key Stage 4 with SEMH will open in September, run by the Beckmead Trust as a satellite of their Ropemakers’ Academy in East Sussex. This will be able to offer placements to the large majority of pupils currently at the school who will be in Key Stage 4 in September. This will offer bespoke education, aimed at re-engaging young people with education</p> |
|---|

through a focus on their interests and aptitudes, and will also focus on transition to the world of work, further education or training.

Placements have been sourced for the few remaining pupils in Key Stage 3 in full consultation with parents and carers and transition arrangements for September are in hand.

What are the desired outcomes of the activity?

The desired outcome is that all current pupils are provided with an alternative placement with better quality provision that can make the required inclusive adjustments necessary for pupils. This will then lead to the school closing. For future pupils needing special placements for SEMH, inclusive adjustments will be undertaken via re-modelled provision in the City.

Which key groups of people do you think are likely to be affected by the activity?

The current pupils at the school and their families

Staff at the school

Future pupils needing SEMH placements

Consultation and engagement

What consultations or engagement activities have already happened that you can use to inform this assessment?

- For example, relevant stakeholders, groups, people from within the council and externally consulted and engaged on this assessment. **If no consultation** has been done or it is not enough or in process – state this and describe your plans to address any gaps.

Consultation to date has taken place with:

- The Regional Director's Office (DfE)
- The Governing Body of the School
- The Beckmead Academy Trust which is providing leadership support to the school
- Amaze and PaCC representatives
- Union representatives
- Informal parental consultation
- Staff consultation

Current data and impact monitoring

Do you currently collect and analyse the following data to enable monitoring of the impact of this activity? Consider all possible intersections.

(Delete and indicate as applicable from the options Yes, No, Not Applicable)

| | |
|--|-----|
| Disability and inclusive adjustments, coverage under equality act and not | Yes |
| Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers) | Yes |

| | |
|---|----------------|
| Religion, Belief, Spirituality, Faith, or Atheism | No |
| Gender Identity and Sex (including non-binary and Intersex people) | No |
| Gender Reassignment | No |
| Sexual Orientation | No |
| Marriage and Civil Partnership | No |
| Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum) | No |
| Armed Forces Personnel, their families, and Veterans | No |
| Expatriates, Migrants, Asylum Seekers, and Refugees | No |
| Carers | No |
| Looked after children, Care Leavers, Care and fostering experienced people | Yes |
| Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections) | No |
| Socio-economic Disadvantage | Yes |
| Homelessness and associated risk and vulnerability | No |
| Human Rights | No |
| Another relevant group (please specify here and add additional rows as needed) | Not applicable |

Additional relevant groups that may be widely disadvantaged and have intersecting experiences that create exclusion and systemic barriers may include:

- Ex-offenders and people with unrelated convictions
- Lone parents
- People experiencing homelessness
- People facing literacy and numeracy barriers
- People on a low income and people living in the most deprived areas
- People who have experienced female genital mutilation (FGM)
- People who have experienced human trafficking or modern slavery
- People with experience of or living with addiction and/ or a substance use disorder (SUD)
- Sex workers

If you answered “NO” to any of the above, how will you gather this data to enable improved monitoring of impact for this activity?

Formal data responses to the DfE are compiled by the school and submitted by the Council. The Council only has available the data made publicly available. Efforts will continue to be made to identify intersectional data beyond the DfE data return via the Performance Manager, Safeguarding and Quality Assurance in the Directorate

What are the arrangements you and your service have for monitoring, and reviewing the impact of this activity?

The activity will be monitored through regular updates at the Departmental Management Team meeting. Further reports on the proposal are expected to be considered by Cabinet.

Impacts

Advisory Note:

- **Impact:**
 - Assessing disproportionate impact means understanding potential negative impact (that may cause direct or indirect discrimination), and then assessing the relevance (that is: the potential effect of your activity on people with protected characteristics) and proportionality (that is: how strong the effect is).
 - These impacts should be identified in the EIA and then re-visited regularly as you review the EIA every 12 to 18 months as applicable to the duration of your activity.
- **SMART Actions mean:** Actions that are (SMART = Specific, Measurable, Achievable, Realistic, T = Time-bound)
- **Cumulative Assessment:** If there is impact on all groups equally, complete **only** the cumulative assessment section.
- **Data analysis and Insights:**
 - In each protected characteristic or group, in answer to the question ‘If “YES”, what are the positive and negative disproportionate impacts?’, describe what you have learnt from your data analysis about disproportionate impacts, stating relevant insights and data sources.
 - Find and use contextual and wide ranges of data analysis (including community feedback) to describe what the disproportionate positive and negative impacts are on different, and intersecting populations impacted by your activity, especially considering for [Health inequalities](#), review guidance and inter-related impacts, and the impact of various identities.
 - For example: If you are doing road works or closures in a particular street or ward – look at a variety of data and do so from various protected characteristic lenses. Understand and analyse what that means for your project and its impact on different types of people, residents, family types and so on. State your understanding of impact in both effect of impact and strength of that effect on those impacted.
- **Data Sources:**
 - **Consider a wide range (including but not limited to):**
 - [Census](#) and [local intelligence data](#)
 - Service specific data
 - Community consultations
 - Insights from customer feedback including complaints and survey results
 - Lived experiences and qualitative data
 - [Joint Strategic Needs Assessment \(JSNA\) data](#)
 - [Health Inequalities data](#)
 - Good practice research
 - National data and reports relevant to the service
 - Workforce, leaver, and recruitment data, surveys, insights
 - Feedback from internal ‘staff as residents’ consultations
 - Insights, gaps, and data analyses on intersectionality, accessibility, sustainability requirements, and impacts.
 - Insights, gaps, and data analyses on ‘who’ the most intersectionally marginalised and excluded under-represented people and communities are in the context of this EIA.
- Learn more about the [Equality Act 2010](#) and about our [Public Sector Equality Duty](#).

6.1 Age

| | |
|--|--------------------------|
| Does your analysis indicate a disproportionate impact relating to any particular Age group? For example: those under 16, young adults, with other intersections. | Yes Pupils from 11-16 |
|--|--------------------------|

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

| Ages of Pupils on Roll - December 2023 | |
|--|----------------------|
| Pupil Age | Percentage of Pupils |
| 11 years | 8% |
| 12 years | 5% |
| 13 years | 19% |
| 14 years | 19% |
| 15 years | 39% |
| 16 years | 5% |
| 17 years | 3%* |

NB* the school does not normally take pupils beyond Year 11 i.e. over 16 years unless there are exceptional circumstances.

These young people are not receiving an adequate secondary education, which could seriously impact their ability to transition successfully into education, employment or training at age 16. Most are from low socio-economic circumstances and without suitable examination success, may struggle to maintain a viable income as adults.

The aim of the consultation is to provide much higher quality placements with good access to alternative provision as needed and thereby improve outcomes and life chances for these pupils.

There may be added disruption for certain age groups who are taking exams or are studying particular qualifications such as GCSEs. The location change and potential provision change for their GCSEs could affect their attainment and progression. Whilst we expect any practical provision change to be positive, the upheaval and disruption caused by moving school could have an impact on this age group at an important time in their development. Receiving schools and settings will be made aware of the impact of transition so these groups of children receive appropriate support.

Staff who are close to retirement age may find new employment difficult to gain, especially those longstanding staff who will be on the Upper Pay Scale and their awards protected, should new posts be taken up.

6.2 Disability:

| | |
|--|-----|
| Does your analysis indicate a disproportionate impact relating to Disability , considering our anticipatory duty ? | Yes |
|--|-----|

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

All pupils on roll have Education, Health and Care plans on account of Social, Emotional and Mental Health (SEMH) Needs. We provide a range of inclusive adjustments to ensure their experience of education is as accessible as possible including language and learning, social, emotional and mental health adjustments.

There may be a cumulative negative impact on pupils due to both their age and neurodivergence. We will work with pupils on a case-by-case basis to ensure inclusive adjustments are made at new school.

The inclusive adjustments required for educational accessibility and SEMH inclusivity of the current pupils are not being adequately delivered. The purpose of this activity is to ensure much-improved responses and adjustments

The proposals are intended to improve the response and adjustments by:

- a. Seeking alternative specialist places for younger pupils that have been judged at least 'good' in inspection and have the resources to make inclusive adjustments.
- b. For older pupils, finding a placement that focuses on re-engaging them in education, that builds positive relationships with families, that provides therapeutic and mental health support as needed and that focuses on their aptitudes and interests, preparing them for the transition to the next stage of education, employment or training.
- c. Alternative placements for all pupils will focus on learning support also to remediate deficits in their learning to date arising from SEND and/or low school attendance.

There needs to be sufficient education placements within a reasonable distance for families, including those families where children cannot be expected to walk to school either for reasons of distance, disability or other reasons. Disabled people and families who may need assistance with travel will be able to apply for transport assistance subject to the Council's transport policy.

The BHISS and SEND teams of the council will provide support for children with EHC plans to ensure that they move to an appropriate school that can meet their needs.

What [inclusive adjustments](#) are you making for diverse disabled people impacted? For example: D/deaf, deafened, hard of hearing, blind, neurodivergent people, those with non-visible disabilities, and with access requirements that may not identify as disabled or meet the legal definition of disability, and have various intersections (Black and disabled, LGBTQIA+ and disabled).

Families will be consulted carefully throughout this process, and inclusive adjustments will be considered on a case by case basis, based on the lived experience of disabled people involved, and other intersecting characteristics. We will take care to seek their views on a future placement. Bespoke support will be offered to pupils affected by the proposed changes.

Support will be offered to parents and carers to engage in the consultation process – they will be offered options for recording their views and help with formulating views in writing or orally. We will ensure that consultation meetings are held in places that are easily accessible by public transport in accessible buildings and also offer online meetings where that is easier for families.

6.3 Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers):

| | |
|---|-----------|
| Does your analysis indicate a disproportionate impact relating to ethnicity? | No |
|---|-----------|

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

| |
|-----------------------------|
| Data on ethnicity of pupils |
|-----------------------------|

| Ethnic Origin | Percentage of Pupils |
|---------------------------------|----------------------|
| Any other Black Background | 3% |
| Mixed White and Black Caribbean | 3% |
| White British | 94% |
| Sum | 100% |

If there are families with English as an additional language, we will make sure any necessary interpretation is provided for meetings or for written communications.

The EMAS service will continue to reach out to communities and to signpost resources that will support families. An interpreter can be sourced if necessary.

6.4 Religion, Belief, Spirituality, Faith, or Atheism:

| | |
|--|----|
| Does your analysis indicate a disproportionate impact relating to Religion, Belief, Spirituality, Faith, or Atheism? | No |
|--|----|

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

We do not know if there are pupils or staff who have any religious beliefs, as this data is not collected. If there are pupils and families with specific religious beliefs, we will ensure that the consultation and transition process does not interfere with religious practices.

6.5 Gender Identity and Sex:

| | |
|---|----|
| Does your analysis indicate a disproportionate impact relating to Gender Identity and Sex (including non-binary and intersex people)? | No |
|---|----|

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Data not Recorded in the School Census

While we do not hold data on this characteristic, the school will know its pupils well and we will work with them to ensure any inclusive adjustments are shared with and implemented at new school.

This characteristic may be relevant to parents and carers of pupils, as well as to pupils at the school. We will be aware of this, and any inclusive adjustments requested by parents and carers will be given the fullest consideration in considering access, carrying out discussions and taking further action.

Where social work, health and/or voluntary sector agencies are involved, if parents, carers and/or young people wish, they should be invited to support. We are not aware of any trans, non-binary or intersex pupils or staff, but we will continue to be aware of this if/when new information arises about pupils, parents and carers, and mitigate any negative impacts caused by the change on a case-by-case basis.

If we are aware of any circumstances where individuals need support, we will ensure that the group is supported and that the school is also supported in using the school's trans toolkit.

If children or parents/carers indicate that they are experiencing discrimination, there will be signposting in place to the appropriate support agencies. We will also ensure that the school is guided to provide the appropriate support and signposting.

Voluntary sector organisations are available for support for children and families regarding their sexual orientation in the city.

Redeployment of the school staff must not take this into account.

6.6 Gender Reassignment:

| | |
|---|----|
| Does your analysis indicate a disproportionate impact relating to Gender Reassignment ? | No |
|---|----|

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

We are not aware of any trans, non-binary or intersex pupils or staff, but we will continue to be aware of this if/when new information arises about pupils, parents and carers, and mitigate any negative impacts caused by the change to a new location on a case-by-case basis, utilising resources such as the Trans toolkit

Where social work, health and/or voluntary sector agencies are involved, if parents, carers and/or young people wish, they should be invited to support.

6.7 Sexual Orientation:

| | |
|--|----|
| Does your analysis indicate a disproportionate impact relating to Sexual Orientation ? | No |
|--|----|

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

We are not aware of LGBTQ+ pupils or staff, but we will continue to be aware of this if/when new information arises about pupils, parents, and carers, and mitigate any negative impacts caused by the change to a new location on a case-by-case basis.

Where social work, health and/or voluntary sector agencies are involved, if parents, carers and/or young people wish, they should be invited to support.

If we are aware of any circumstances where individuals request inclusive adjustments, we will ensure that this group is supported and that the school is also supported in guiding people through to resources and signposting support.

Voluntary sector organisations are available for support for children and families regarding their sexual orientation in the City.

6.8 Marriage and Civil Partnership:

| | |
|--|----|
| Does your analysis indicate a disproportionate impact relating to Marriage and Civil Partnership ? | No |
|--|----|

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

6.9 Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum):

| | |
|--|-----------|
| Does your analysis indicate a disproportionate impact relating to Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)? | No |
|--|-----------|

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

6.10 Armed Forces Personnel, their families, and Veterans:

| | |
|---|-----------|
| Does your analysis indicate a disproportionate impact relating to Armed Forces Members and Veterans? | No |
|---|-----------|

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

6.11 Expatriates, Migrants, Asylum Seekers, and Refugees:

| | |
|---|-----------|
| Does your analysis indicate a disproportionate impact relating to Expatriates, Migrants, Asylum seekers, Refugees, those New to the UK, and UK visa or assigned legal status? (Especially considering for age, ethnicity, language, and various intersections) | No |
|---|-----------|

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

6.12 [Carers](#):

| | |
|--|------------------|
| <p>Does your analysis indicate a disproportionate impact relating to Carers (Especially considering for age, ethnicity, language, and various intersections).</p> | <p>No</p> |
|--|------------------|

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

| |
|---|
| <p>Not Recorded in the School Census</p> <p>In circumstances where individuals have inclusive adjustments, we will ensure that this group is supported and that the school is supported in guiding people to resources and support.</p> |
|---|

6.13 Looked after children, Care Leavers, Care and fostering experienced people:

| | |
|--|-------------------|
| <p>Does your analysis indicate a disproportionate impact relating to Looked after children, Care Leavers, Care and fostering experienced children and adults (Especially considering for age, ethnicity, language, and various intersections).</p> <p>Also consider our Corporate Parenting Responsibility in connection to your activity.</p> | <p>Yes</p> |
|--|-------------------|

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

| |
|--|
| <p>6% of pupils are currently looked after.</p> <p>The Virtual School for Looked After Children, the child’s social worker and foster parent(s) will be fully involved in the consultation and consequent actions. The Virtual School has responsibility to support children in care and those known to a social worker. Support will be provided to any relevant child displaced from Homewood College and to the school they will be attending. The council has adopted Children in Care and Care Experienced as a protected characteristic.</p> |
|--|

6.14 Homelessness:

| | |
|--|------------------|
| <p>Does your analysis indicate a disproportionate impact relating to people experiencing homelessness, and associated risk and vulnerability? (Especially considering for age, veteran, ethnicity, language, and various intersections)</p> | <p>No</p> |
|--|------------------|

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

| |
|----------|
| <p> </p> |
|----------|

6.15 Domestic and/or Sexual Abuse and Violence Survivors, people in vulnerable situations:

| | |
|--|-----------|
| Does your analysis indicate a disproportionate impact relating to Domestic Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)? | No |
|--|-----------|

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

6.16 Socio-economic Disadvantage:

| | |
|--|------------|
| Does your analysis indicate a disproportionate impact relating to Socio-economic Disadvantage? (Especially considering for age, disability, D/deaf/ blind, ethnicity, expatriate background, and various intersections) | Yes |
|--|------------|

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

| Eligible for FSM | Percentage of pupils |
|------------------|----------------------|
| Not eligible | 23% |
| Eligible | 77% |

The percentage of pupils eligible for free school meals is a key indicator of socio-economic disadvantage in families and the percentage here (77%) is much higher than average.

Parents and carers with limited financial means may need support with attending meetings relating to transfer of placement and this will be considered as part of the transition process.

To improve inter-generational socio-economic status, we will work with pupils to ensure they have the best access post 16 to further education, employment, and training.

6.17 Human Rights:

| | |
|--|-----------|
| Will your activity have a disproportionate impact relating to Human Rights? | No |
|--|-----------|

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

6.17 Cumulative, multiple intersectional, and complex impacts (including on additional relevant groups):

What cumulative or complex impacts might the activity have on people who are members of multiple Minoritised groups?

- For example: people belonging to the Gypsy, Roma, and/or Traveller community who are also disabled, LGBTQIA+, older disabled trans and non-binary people, older Black and Racially Minoritised disabled people of faith, young autistic people.
- Also consider wider disadvantaged and intersecting experiences that create exclusion and systemic barriers:
 - People experiencing homelessness
 - People on a low income and people living in the most deprived areas
 - People facing literacy and numeracy barriers
 - Lone parents
 - People with experience of or living with addiction and/ or a substance use disorder (SUD)
 - Sex workers
 - Ex-offenders and people with unrelated convictions
 - People who have experienced female genital mutilation (FGM)
 - People who have experienced human trafficking or modern slavery

The key characteristics for pupils are that they all have complex SEMH, necessitating Education, Health and Care plans, and that 77% of pupils are eligible for Free School Meals, indicating that the majority of families are affected by low income and many live in the most deprived areas. Additionally, this is compounded by the very low attendance at the school.

The cumulative effects of these key characteristics, plus any others that may apply, are likely to make the transition process to a new placement particularly difficult for these pupils. To mitigate this, additional counselling and psychological support will be provided as needed. PHSE and classroom support should have a focus on managing change and transition. Every effort will be made to ensure full engagement in the process of transition and support at every step, including induction and orientation visits as needed and the involvement of familiar staff in the process.

Onward placements will be fully informed about any inclusive adjustments for pupils and families, where there is consent for this, and also signposted to resources and support available within the City.

All characteristics above may be relevant to parents and carers of pupils, as well as to pupils at the school, and any inclusive adjustments requested by parents and carers should be given the fullest consideration in considering access, carrying out discussions and taking further action. This will require the council to inform and involve all relevant agencies and support groups as appropriate in signposting and offering resources and support.

We are aware that there will be people who may be impacted because of multiple protected characteristics and intersections of discrimination. This may severely limit their ability, desire or access to engage with both the consultation and any future engagement around school closure and considering a new school place.

Where there are multi-layered impacts, we are willing to assess this on a case-by-case basis with bespoke resources and support to address these barriers.

Additionally, most pupils at the school are persistent absentees and will need support to re-engage with their education. Average attendance this academic year has been 49%.

We are aware that there are some gaps in our data that makes it difficult to fully assess the cumulative impacts this will have on pupils or staff across intersecting protected characteristics, but we will continue to be aware of this if/when new information arises about pupils, parents and carers, and mitigate any negative impacts caused by the change to a new location on a case-by-case basis.

Where social work, health and/or voluntary sector agencies are involved, if parents, carers and/or young people wish, they should be invited to support.

If we are aware of any circumstances where individuals request inclusive adjustments, we will ensure that this group is supported and that the school is also supported in guiding people through to resources and signposting support.

Action planning

What SMART actions will be taken to address the disproportionate and cumulative impacts you have identified?

- Summarise relevant SMART actions from your data insights and disproportionate impacts below for this assessment, listing appropriate activities per action as bullets. (This will help your Business Manager or Fair and Inclusive Action Plan (FIAP) Service representative to add these to the Directorate FIAP, discuss success measures and timelines with you, and monitor this EIA's progress as part of quarterly and regular internal and external auditing and monitoring)

1. Ensure full & accessible consultation with pupils and their families and with staff on the reasons for this activity and future plans

- Identify the needs of current pupils, hold annual reviews to consider future placement, identify higher quality placements and plan transfers for September 2024
- Consider identified SEND and any protected characteristics in sourcing alternative placements

2. Ensure full & accessible consultation with staff and their unions in relation to redeployment and redundancy options

- Map out consultation process with HR
- Ensure any specific health issues and protected characteristics taken into account in redeployment/ redundancy consultations.
- Ensure staff have access to council's wellbeing resources, including individual counselling

Which action plans will the identified actions be transferred to?

- For example: Team or Service Plan, Local Implementation Plan, a project plan related to this EIA, FIAP (Fair and Inclusive Action Plan) – mandatory noting of the EIA on the Directorate EIA Tracker to enable monitoring of all equalities related actions identified in this EIA. This is done as part of FIAP performance reporting and auditing. Speak to your Directorate's Business Improvement Manager (if one exists for your Directorate) or to the Head of Service/ lead who enters actions and performance updates on FIAP and seek support from your Directorate's EDI Business Partner.

None as yet to be added to EIA actions tracker (currently in development)

Outcome of your assessment

What decision have you reached upon completing this Equality Impact Assessment? (Mark 'X' for any ONE option below)

Stop or pause the activity due to unmitigable disproportionate impacts because the evidence shows bias towards one or more groups.

| | |
|--|----------|
| Adapt or change the activity to eliminate or mitigate disproportionate impacts and/or bias. | |
| Proceed with the activity as currently planned – no disproportionate impacts have been identified, or impacts will be mitigated by specified SMART actions. | |
| Proceed with caution – disproportionate impacts have been identified but having considered all available options there are no other or proportionate ways to achieve the aim of the activity (for example, in extreme cases or where positive action is taken). Therefore, you are going to proceed with caution with this policy or practice knowing that it may favour some people less than others, providing justification for this decision. | X |

If your decision is to “Proceed with caution”, please provide a reasoning for this:

The alternative to ‘proceeding with caution’ is the status quo which is providing an unacceptable level of education at very high cost to pupils that we provide very specific and nuanced inclusive adjustments for. As things stand, Ofsted would be likely to close the school in any event when the next section 5 inspection takes place this summer, due to insufficient progress.

To mitigate any difficulties to be faced by pupils and families, together with school leaders and staff, the Council will take action to ensure the consultation and transfer process works in partnership with families, is sensitive to any specific characteristics pupils and/or their parents and carers may have, and offers specialist support for any emotional and mental health needs that may be heightened by the uncertainties involved in change.

In addition, the Council will make sure venues to be visited are fully accessible and that support is provided for travel and transport if needed.

Summarise your overall equality impact assessment recommendations to include in any committee papers to help guide and support councillor decision-making:

The proposal here is to consult on the closure of Homewood College, following alternative placements being sought and found for existing pupils. There are serious considerations here in terms of equality impact assessment, as the pupils are particularly vulnerable, and all have complex and severe SEND. However, new placements are currently being sourced that meet their needs and provide a good quality of education. New pupils with SEMH will have access to the new places in the City’s re-modelling SEMH provision.

Specifically, 78% pupils who will be on roll in September will have the opportunity to transfer to a new provision at St George’s House in the City, which will be run for Key Stage 4 pupils by the Beckmead Trust, a specialist Academy chain, as a satellite of their Ropemakers’ Academy in East Sussex. This will offer a bespoke education tailored towards re-engaging pupils in education and focussing on the transition to further education, employment, or training.

For the very few pupils who will still be in Key Stage 3 in September, alternative placements have been sought that meet their special educational needs, following detailed consultation with parents and carers and transition arrangements are in hand.

Publication

All Equality Impact Assessments will be published. If you are recommending, and choosing not to publish your EIA, please provide a reason:

Directorate and Service Approval

| Signatory: | Name and Job Title: | Date: DD-MMM-YY |
|---------------------------|--|-----------------|
| Responsible Lead Officer: | Richard Barker, Head of School Organisation | 20-May-24 |
| Accountable Manager: | Jo Lyons, Assistant Director, Education and Skills | 21-May-24 |

Notes, relevant information, and requests (if any) from Responsible Lead Officer and Accountable Manager submitting this assessment:

EDI Review, Actions, and Approval:

Equality Impact Assessment sign-off

EIA Reference number assigned: FCL105-28-May-24-EIA-Homeward-College-Closure
For example, HNC##-25-Dec-23-EIA-Home-Energy-Saving-Landlord-Scheme

EDI Business Partner to cross-check against aims of the equality duty, public sector duty and our civic responsibilities the activity considers and refer to relevant internal checklists and guidance prior to recommending sign-off.

Once the EDI Business Partner has considered the equalities impact to provide first level approval for by those submitting the EIA, they will get the EIA signed off and sent to the requester copying the Head of Service, Business Improvement Manager, [Equalities inbox](#), any other service colleagues as appropriate to enable EIA tracking, accountability, and saving for publishing.

| Signatory: | Name: | Date: DD-MMM-YY |
|---|--------------|-----------------|
| EDI Business Partner: | Jamarl Billy | 24-MAY-24 |
| EDI Manager: | Sabah Holmes | 24-MAY-24 |
| Head of Communities, Equality, and Third Sector (CETS) Service: <i>(For Budget EIAs/ in absence of EDI Manager/ as final approver)</i> | | |

Notes and recommendations from EDI Business Partner reviewing this assessment:

Notes and recommendations (if any) from EDI Manager reviewing this assessment:

Notes and recommendations (if any) from Head of CETS Service reviewing this assessment:

