

## 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.

<b>Name of activity or proposal being assessed:</b>	<b>Formal closure of Homeward College</b>
<b>Directorate:</b>	Families, Children and Learning
<b>Service:</b>	Education and Skills
<b>Team:</b>	School Organisation
<b>Is this a new or existing activity?</b>	New

<b>Are there related EIAs that could help inform this EIA? Yes or No (If Yes, please use this to inform this assessment)</b>	YES – related EIAs include St Peters and St Barts school closures
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### Contributors to the assessment (Name and Job title)

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

### About the activity

Briefly describe the purpose of the activity being assessed:

As the Council now has 'in principle' agreement that the Secretary of State for Education will revoke the Academy Order on Homewood College, it sought the agreement of Cabinet to consult on the school's closure. This was granted on 27 June 2024 and a public consultation activity ran between 8 July 2024 and 5 September 2024.

Staff and families were consulted on proposals linked to the council de-commissioning the places at Homewood College from September 2024. From September 2024 no pupils have the school named in their Education, Health and Care Plan and no staff are employed at the school.

#### Background

Homewood College is a small community special school that has been in 'special measures' for over two years and continued 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.

All pupils at the school were aged 11-16 and had Education, Health and Care Plans. Overall attendance last academic year averaged approximately 49%. The school has 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.

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.

Subject to a final decision by the Secretary of State to revoke the Academy Order, the Council is proposing to continue the statutory process to close the school.

What are the desired outcomes of the activity?

The desired outcome is that the Council publishes statutory notices about the school's closure and seeks further responses to the proposal albeit there will be no public meetings during this formal representation period.

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

The previous pupils at the school and their families who were aware of the provision made by the school.  
 Staff previously employed at the school who had experience of teaching and supporting pupils 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

In addition, a public consultation resulted in 19 responses being received. 3 replies outlined support for the Council's proposals and 6 responses stated they were not sure. The remaining responses were against the council's proposal to close the school on 31 December 2024.

## 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)

<b>Disability and inclusive adjustments, coverage under equality act and not</b>	Yes
<b>Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers)</b>	Yes
<b>Religion, Belief, Spirituality, Faith, or Atheism</b>	Yes – in relation to previous consultees
<b>Gender Identity and Sex (including non-binary and Intersex people)</b>	Yes – in relation to previous consultees
<b>Gender Reassignment</b>	No
<b>Sexual Orientation</b>	Yes – in relation to previous consultees
<b>Marriage and Civil Partnership</b>	No

<b>Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)</b>	No
<b>Armed Forces Personnel, their families, and Veterans</b>	Yes – in relation to previous consultees
<b>Expatriates, Migrants, Asylum Seekers, and Refugees</b>	No
<b>Carers</b>	No
<b>Looked after children, Care Leavers, Care and fostering experienced people</b>	Yes
<b>Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)</b>	No
<b>Socio-economic Disadvantage</b>	Yes
<b>Homelessness and associated risk and vulnerability</b>	No
<b>Human Rights</b>	No
<b>Another relevant group (please specify here and add additional rows as needed)</b>	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 about pupils and staff 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. More information may have been supplied by responders to the consultation on the proposals to close the school that took place between July – September 2024.

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

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

<b>Ages of Pupils on Roll - December 2023</b>	
<b>Pupil Age</b>	<b>Percentage of Pupils</b>
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. No pupils are registered to attend the school from September 2024.

These young people were 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 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. As a result, it is proposed that Homewood College closes.

Whilst we expect any practical provision change from September 2024 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 have been 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 if they have not been successful in being redeployed before redundancy took effect.

3 responses to the consultation declared their age range as being 35-44; 3 were 45 – 54, 4 were 55-64 and one was 65-74.

## 6.2 Disability:

Does your analysis indicate a disproportionate impact relating to <a href="#">Disability</a> , considering our <a href="#">anticipatory duty</a> ?	Yes
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### 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>All pupils previously on roll had 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.</p> <p>There may be a cumulative negative impact on pupils due to both their age and neurodivergence. Working with pupils on a case-by-case inclusive adjustments have been made at their new school.</p> <p>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.</p> <p>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.</p> <p>2 responses to the consultation confirmed that day-to-day activities are limited because of a health problem or disability. Eight responders stated that they were not.</p>
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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).

<p>Families have been consulted throughout this process, and inclusive adjustments were considered on a case-by-case basis, based on the lived experience of disabled people involved, and other intersecting characteristics.</p> <p>Support will be offered to parents and carers to engage in the representation process should statutory notices be published – they will be offered options for recording their views and help with formulating views in writing or orally.</p>
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## 6.3 Ethnicity, ‘Race’, ethnic heritage (including Gypsy, Roma, Travellers):

Does your analysis indicate a disproportionate impact relating to ethnicity?	No
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### 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 – Note no pupils are on the school roll from September 2024.	
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.

Only 10 responders to the consultation replied to this question and these were all White: English, Welsh, Scottish, Northern Irish, British.

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

<b>Does your analysis indicate a disproportionate impact relating to Religion, Belief, Spirituality, Faith, or Atheism?</b>	<b>No</b>
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#### 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 former 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.

One response to the consultation stated their religion was Muslim, one was agnostic, 2 were Christian and the remaining 8 responders who answered the question stated they had no particular belief or religion.

#### 6.5 Gender Identity and Sex:

<b>Does your analysis indicate a disproportionate impact relating to <a href="#">Gender Identity</a> and <a href="#">Sex</a> (including non-binary and intersex people)?</b>	<b>No</b>
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#### 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 have known its pupils well and we worked with them to ensure any inclusive adjustments are shared with and implemented at a new school.

This characteristic may be relevant to parents and carers of former pupils. We will continue to 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 former pupils or staff.

If children or parents/carers indicate that they are experiencing discrimination, there will be signposting in place to the appropriate support agencies.

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

Of the 10 responses to the consultation that commented on their sexual orientation, one preferred not to say and the remaining responders stated they were heterosexual/straight. All responders stated they identify with the gender they were assigned at birth. Of those who answered the question, 2 responders were male and 9 were female.

### 6.6 Gender Reassignment:

Does your analysis indicate a disproportionate impact relating to <a href="#">Gender Reassignment</a> ?	No
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#### 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 former 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 <a href="#">Sexual Orientation</a> ?	No
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#### 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+ former 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:

<b>Does your analysis indicate a disproportionate impact relating to Marriage and Civil Partnership?</b>	<b>No</b>
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#### 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):

<b>Does your analysis indicate a disproportionate impact relating to Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)?</b>	<b>No</b>
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#### 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:

<b>Does your analysis indicate a disproportionate impact relating to Armed Forces Members and Veterans?</b>	<b>Yes</b>
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#### 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.

No responders to the consultation indicated that they were armed forces personnel, their families or veterans.

### 6.11 Expatriates, Migrants, Asylum Seekers, and Refugees:

<b>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)</b>	<b>No</b>
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#### 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><b>Does your analysis indicate a disproportionate impact relating to <a href="#">Carers</a> (Especially considering for age, ethnicity, language, and various intersections).</b></p>	<p><b>No</b></p>
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#### 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 – Note no pupils are registered to attend Homewood College from September 2024.</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> <p>3 of 11 responders who answered this question stated that they were carers.</p>
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### 6.13 Looked after children, Care Leavers, Care and fostering experienced people:

<p><b>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).</b></p> <p><b>Also consider our <a href="#">Corporate Parenting Responsibility</a> in connection to your activity.</b></p>	<p><b>Yes</b></p>
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#### 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 former pupils attending in 2023-24 were currently looked after.</p> <p>The Virtual School for Looked After Children, the child’s social worker and foster parent(s) were 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> <p>One responder of 11 stated they would prefer not to say and the remaining replies from those who were not care experienced by virtue of being looked after by a local authority for at least 13 weeks since the age of 14.</p>
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### 6.14 Homelessness:

<p><b>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)</b></p>	<p><b>No</b></p>
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**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.

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

<b>Does your analysis indicate a disproportionate impact relating to Domestic Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)?</b>	<b>No</b>
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**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.

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**6.16 Socio-economic Disadvantage:**

<b>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)</b>	<b>Yes</b>
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**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 former pupils in 2023-24 eligible for free school meals was much higher than average. Parents and carers with limited financial means may need support with attending meetings at new placements.

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:**

<b>Will your activity have a disproportionate impact relating to Human Rights?</b>	<b>No</b>
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**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 former pupils are that they all have complex SEMH, necessitating Education, Health and Care plans, and that 77% of former pupils were 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 was 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 have made the transition process to a new placement particularly difficult for these pupils. To mitigate this, additional counselling and psychological support was provided as needed. PHSE and classroom support should have a focus on managing change and transition. Every effort was 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 were 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 former pupils, as well as to the children and young people themselves and any inclusive adjustments requested by parents and carers should have been given the fullest consideration in considering access, carrying out discussions and taking further action.

We are aware that there will have been 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 public consultation and any future engagement around school closure.

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 former pupils at the school are persistent absentees and will need support to re-engage with their education.

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 former pupils or staff. In addition, details from the 19 responses to the public consultation do not contain a full data set.

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 to continue to be involved in the consultation process, we will ensure that this group is supported.

## 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 former pupils and their families and with former staff on the reasons for this activity and future plans

- Identify the needs of former pupils and staff
- Consider identified SEND and any protected characteristics in monitoring the transition of pupils to new provision.
- Provide case-by-case support and adjustments where required.

### 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)

<b>Stop or pause</b> the activity due to unmitigable disproportionate impacts because the evidence shows bias towards one or more groups.	
<b>Adapt or change</b> the activity to eliminate or mitigate disproportionate impacts and/or bias.	
<b>Proceed</b> with the activity as currently planned – no disproportionate impacts have been identified, or impacts will be mitigated by specified SMART actions.	
<b>Proceed with caution</b> – 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).	<b>X</b>

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.

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 was 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 due to insufficient progress. From September 2024 the school had no pupils on its roll and no staff employed to teach at Homewood College. Any re-commissioning of places would take time to achieve.

To mitigate any difficulties to be faced the Council will take action to ensure the next stage of the process, the issuing of a statutory notice can be accessed by all those who wish to make a representation.

**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 continue to the statutory process to close Homewood College by issuing a statutory notice and entering into a 4 week representation period. The serious considerations in terms of equality impact assessment on the proposal have been reduced by virtue of all pupils having new provision named in their Education, Health and Care Plans. Staff are no longer employed at Homewood College.

New pupils with SEMH will have access to the new places in the City’s re-modelling SEMH provision.

Specifically, 78% pupils who were on roll at Homewood College and due to be in Key stage 4 in September had the opportunity to transfer to a new provision at St George’s House run by the Beckmead Trust, a specialist Academy chain, as a satellite of their Ropemakers’ Academy in East Sussex. This is offering a bespoke education tailored towards re-engaging pupils in education and focussing on the transition to further education, employment, or training.

## Publication

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

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## Directorate and Service Approval

Signatory:	Name and Job Title:	Date: DD-MMM-YY
Responsible Lead Officer:	Richard Barker, Head of School Organisation	17-September-24
Accountable Manager:	Jo Lyons, Assistant Director, Education and Skills	18-September-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:** [FCL105A-28-May-24-EIA-Homeward-College-Closure-Stat-Notice](#)  
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	Reviewed a previous version in May 2024
EDI Manager:	Sabah Holmes	16-Sep-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: