

Equality Impact Assessment (EIA) Report Form

Where do you work?	
Service Area:	Strategic School Improvement Programme (SSIP)
Directorate:	Education, Leisure and Lifelong Learning (ELLL)

(a) This EIA is being completed for a...

Service/ Function	Policy/ Procedure	Project	Strategy	Plan	Proposal
<input type="checkbox"/>	x				

(b) Please name and describe below...

A proposal to establish two Primary Education Nurture Centres to provide specialist support for primary age pupils who externalise their behaviours.

It is proposed that one centre is located at Crynallt Primary School, Afan Valley Road, Cimla, Neath and the other at Coedffranc Primary School, Stanley Road, Skewen, Neath.

A need for additional primary age places for pupils with Social, Emotional and Behavioural Difficulties (SEBD) has been identified and following a scoping exercise of primary schools across Neath Port Talbot, Crynallt Primary School and Coedffranc Primary School have been identified as suitable schools for this provision.

It is proposed that the centre at Coedffranc Primary School will have 12 assessment places and the centre at Crynallt Primary School will have 12 places for pupils with a statement of SEN. All places will be for those pupils identified as having Social, Emotional and Behavioural Difficulties (SEBD).

(c) It was initially screened for relevance to Equality and Diversity on 28.04.2017

(d) It was found to be relevant to...

Age	x	Race	x
Disability	x	Religion or belief.....	x
Gender reassignment	<input type="checkbox"/>	Sex	x
Marriage & civil partnership	<input type="checkbox"/>	Sexual orientation.....	<input type="checkbox"/>
Pregnancy and maternity	<input type="checkbox"/>	Welsh language.....	x

(e) Lead Officer

Name: Debora Holder-Phillips
Strategic School Improvement Programme
Date: 12.07.2017

(f) Approved by Head of Service

Name: Andrew Thomas
Date: 12.07.2017

Section 1 – Aims:

Briefly describe the aims of the function, service, policy, procedure, strategy, plan, proposal or project

What are the aims?

To establish two specialist provisions for primary aged pupils (boys and girls) with SEBD, one at Crynallt Primary School and one at Coedffranc Primary School. It is proposed that one centre will be established at Crynallt Primary School and the second at Coedffranc Primary School.

The proposal comes under the School Standards and Organisation (Wales) Act 2013. Under this legislation, the process for change requires a full statutory consultation programme to receive comments on the proposal followed by a statutory notice period for receiving objections on the proposal.

Who has responsibility?

Director of Education Leisure and Lifelong Learning, Head of Transformation and Strategic School Improvement Programme

Who are the stakeholders?

The main stakeholders are pupils and their parents/carers/ school staff/ governors and the wider school community.

There are other key stakeholders listed under The Welsh Government School Organisation Statutory Code document no 006/2013 who must be consulted as part of this process.

Section 2 - Information

(a) Service Users

Please tick what information you know about your service users and provide details / evidence of how this information is collected.

Age	x	Race	x
Disability	x	Religion or belief.....	x
Gender reassignment	<input type="checkbox"/>	Sex	x
Marriage & civil partnership	x	Sexual orientation.....	<input type="checkbox"/>
Pregnancy and maternity	x	Welsh language.....	x

What information do you know about your service users and how is this information collected?

The proposal is in its formative stage; accordingly the pupils who will attend the proposed provisions are as yet unidentified but will be drawn from across the County Borough.

Centre Staff – Staffing arrangements are yet to be determined. Specialist staff will be needed.

PLASC 2017 data shows that there are 789 pupils across all schools in Neath Port Talbot with SEBD as their main diagnosis. Pupil numbers include nursery children. This total is split by 364 pupils under School Action, 368 under School Action Plus and 57 with statements.

These pupils are both male and female, 580 are male and 209 are female.

Out of the 789 pupils identified, 96% describe their ethnicity as White British. 74% of these pupils are male. Numbers in all other ethnic group do not reach 1% of the total number of pupils.

From the total of 789 pupils with a main diagnosis of SEBD, there are 426 (54%) primary aged pupils, including nursery children. Out of these pupils, 78% are male and in terms of ethnicity, again 96% describe their ethnicity as White British and numbers in all other ethnic group do not reach 1% of the total number of pupils.

Data relating to the existing schools -

Crynallt Primary School

PLASC 2017 data shows that there are 507 pupils on roll. Pupil numbers at the school are forecasted to fall over the next four years, increasing the school's surplus accommodation. Even after setting aside rooms and facilities for the specialist provision there is sufficient room available to accommodate the proposed provision.

Coedffranc Primary School

PLASC 2017 data shows that there are 385 pupils on roll. Pupil numbers at the school are forecasted to fall over the next four years, increasing the school's surplus accommodation. Even after setting aside rooms and facilities for the specialist provision there is sufficient room available to accommodate the Primary Educational Nurture Centre.

Age -

Pupils - The proposal relates to two maintained primary schools for pupils aged 3-11. Only those of primary school age would be able to access the provisions if the proposal goes ahead. However, there is already specialist provision for older pupils.

Staff – Currently there are 53 members of staff at Crynallt Primary School aged between 21 and 60. Coedffranc has 58 members of staff aged between 25 and 63. Staffing arrangements for the two centres are yet to be determined but specialist staff will be needed.

Disability –

Pupils – Both Crynallt and Coedffranc Primary Schools are mainstream schools but provide for pupils with additional learning needs in a mainstream setting.

Currently Crynallt has 7 pupils who have statements of special educational needs. There are also 45 pupils on School Action Plus and 50 pupils on School Action.

Coedffranc has 5 pupils who have statements of special educational needs. There are also 31 pupils on School Action Plus and 63 pupils on School Action.

All of these pupils have their additional learning needs catered for by the schools.

If the proposal goes ahead and specialist provision is established at Crynallt Primary School and at Coedffranc Primary School, these centres will provide for the assessment of those pupils who are displaying externalised behavioural needs and who are finding difficulty in maintaining their mainstream school placement.

Admission to Coedffranc inclusion and assessment centre will not require the pupil to have a Statement of Special Educational Needs, while admission to Crynallt learning support centre will require pupils to have a statement of SEN for SEBD. Although both provisions are in a mainstream school the pupils who are admitted to the centre are in addition to admission number of the school. Admission will be via a SEN admission panel of the Council.

To provide for pupils with specific special educational needs, NPTCBC currently has 2 special schools and a number of Learning Support Centres placed in schools across the County Borough. In addition to the specialist schools and centres each mainstream school has the capability to provide for pupils with special educational needs within a mainstream setting.

Any pupil with a disability is assessed on an individual basis and relevant modifications, adaptation or reasonable adjustments made where applicable, this is the case for all types of disabilities. Assessment on an individual basis includes application for home to school transport.

Staff – HR records show that there are no members of staff at either school who have declared that they have a disability.

Race –

Pupils- Both Crynallt and Ceodffranc Primary Schools are inclusive for pupils of all ethnic groups. Ethnicity is not a criterion under the Council's Admissions Policy for this school. Admission to the proposed two centres will be via a SEN admission panel of the Council, ethnicity will not be criteria for admission to the centres.

PLASC 2017 data shows that there are 20 BME pupils at Crynallt Primary School. These pupils represent 4% of the total pupil cohort. The 20 BME pupils include those who have described themselves as Arab, Bangladeshi, Filipino, Indian, Sri Lankan Tamil, White + Asian, White + Black Caribbean and White + any other ethnic group. There is a fairly equal split of the number of pupils in each of these ethnicity groups.

The same data shows that there are 27 BME pupils at Coedffranc Primary School. These pupils represent 7% of the total pupil cohort. The 27 BME pupils include those who have described themselves as Arab, Bangladeshi, Latin/Central America, Polish, Slovakian, other Asian, Other Chinese, Other Mixed Background, White + Asian, White + Black Caribbean, White + Chinese, White + any other ethnic group. The largest number of pupils from this group have described themselves as Bangladeshi (37%).

Staff – HR records show that staff at Crynallt Primary School have declared their nationality as 34 British/ 11 Welsh/ 1 English/ 1 Scottish/ and 6 prefer not to say.

HR records show that staff at Coedffranc Primary School have declared their nationality as 33 British/ 21 Welsh/ 1 English/ 1 Irish/ and 2 prefer not to say.

Religion or belief –

Pupils – Neither Crynallt Primary or Coedffranc Primary are faith schools. Religion or belief is not a criterion under the Council's Admissions Policy for this school. If the proposal goes ahead the centres will be fully inclusive for pupils of all religions or beliefs.

Pupil records for Crynallt Primary School show that there are 90 pupils who have declared a religion or belief out of these pupils have declared the following religion/belief - 5 Muslim / 2 Hindu / 72 Christian / 11 Other. All other pupils left the religion option blank and 91 declared no religion.

Staff - Data held is according to what individuals have chosen to disclose. No data is held for any of the staff of Crynallt Primary School.

Pupil records for Coedffranc Primary School show that there are 56 pupils who have declared a religion or belief out of these pupils have declared the following religion/belief - 13 Muslim / 3 Buddhist/ 2 Catholic/ 1 Baptist/ 9 Christian /1 Methodist/ 2 Jehovah Witness/ 2 Other. All other

pupils left the religion option blank and 23 declared no religion.

Staff - Data held is according to what individuals have chosen to disclose. No data is held for any of the staff of Coedffranc Primary School.

Sex –

Pupils – Crynallt Primary School admits both boys and girls. PLASC 2017 data shows that pupils are split by gender with 54% of the pupil cohort being male and 46% are female.

Coedffranc Primary School admits both boys and girls. The same data shows that pupils are split by gender with 49% of the pupil cohort being male and 51% are female.

If the proposal goes ahead, placements at both centres will be available for both male and female pupils.

Staff – Both schools employ both male and female staff members. There are 6 male and 47 female members of staff and Crynallt Primary School. At Coedffranc Primary School there are 6 male and 52 female members of staff.

Pregnancy and maternity –

Pupils – At the time of this assessment the Council is not aware of any pupil being pregnant at either school. The Council and the school will liaise to ensure any pupil who is pregnant can continue with their education.

Staff – The Council has policies in place to cover those members of staff who are pregnant or on maternity leave/paternity leave.

Gender reassignment -

Data held is according to what individuals have chosen to disclose. No data is held for any of the pupils or school staff at either primary school.

Marriage and civil partnership -

Pupils – this characteristic is not applicable due to the age of the pupils.

Staff – HR records show that at Crynallt Primary School members have declared their marital status as 32 Married/ 17 Single and 3 Divorced.

HR records show that at Coedffranc Primary School members have declared their marital status as 26 Married/ 15 Single/ 10 Divorced/ 6 Partnered / 1 Widowed.

Sexual Orientation –

Data held is according to what individuals have chosen to disclose. No data is held for any of the pupils or school staff at either primary school.

Information is collected by NPTCBC in respect of pupil and school data through various means such as Data Unit, School Admissions, School and Family Support, Additional Learning Needs Support Team, Strategic School Improvement Programme etc. Estyn Inspection reports are also considered.

Data used for completing Section 2 includes:
PLASC data as at January 2017
NPTCBC HR records
School pupil and staff records

Any Actions Required?

Continue to check and monitor data against the protected characteristics for any impact the proposal may have on any group.

(b) General

What information do you know and how is this information collected?

This proposal relates to additional SEBD provision for primary aged pupils ordinarily living within the Neath Port Talbot County Borough area. The Council collects PLASC data for all pupils annually and this data has been utilised when undertaking this EIA. Each school hold individual pupil files and the Council’s HR Section holds information on staff members. This data has also been scrutinised for this EIA.

The proposal does not intend to make any change to the school category as a mainstream English-medium primary school.

If the proposal goes ahead there may be a positive effect on the staffing compliment of the school as an increase in pupil numbers by the establishment of the centres may require additional members of staff.

Any Actions Required?

Continue to check and monitor data against the protected characteristics for any impact the proposal may have on any group.

Section 3 – Impact

(a) Impact on Protected Characteristics

Please consider the possible impact on people with different protected characteristics. This could be based on service user information, data, consultation and research or professional experience (e.g. comments and complaints).

	Positive	Negative	Neutral	Needs further investigation
Age	➔ <input type="checkbox"/>	<input type="checkbox"/>	x	<input type="checkbox"/>
Disability	➔ x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Gender reassignment	➔ <input type="checkbox"/>	<input type="checkbox"/>	x	<input type="checkbox"/>
Marriage & civil partnership	➔ <input type="checkbox"/>	<input type="checkbox"/>	x	<input type="checkbox"/>
Pregnancy and maternity	➔ <input type="checkbox"/>	<input type="checkbox"/>	x	<input type="checkbox"/>
Race	➔ <input type="checkbox"/>	<input type="checkbox"/>	x	<input type="checkbox"/>
Religion or belief	➔ <input type="checkbox"/>	<input type="checkbox"/>	x	<input type="checkbox"/>
Sex	➔ <input type="checkbox"/>	<input type="checkbox"/>	x	<input type="checkbox"/>
Sexual orientation	➔ <input type="checkbox"/>	<input type="checkbox"/>	x	<input type="checkbox"/>
Welsh language	➔ <input type="checkbox"/>	<input type="checkbox"/>	x	<input type="checkbox"/>

Thinking about your answers above, please explain (in detail) why this is the case. Include details of any consultation (and/or other information) which has been undertaken to support your view.

See response to Section 2 (b) General. In addition, the proposal is in its formative stage therefore it will be subject to full consultation with stakeholders. The consultation process will further inform decisions and identify any necessary actions.

(b) Impact on the Welsh Language

What is the likely impact of the policy on:

- **Opportunities for people to use Welsh**
- **The equal treatment of the Welsh and English languages**

Please give details

Welsh language –

Pupils – Both Crynallt and Coedffranc Primary Schools are English-medium schools therefore pupils are taught through the medium of English although Welsh is taught as a second language in line with the National Curriculum. Welsh language education will be provided at each provision. NPTCBC has developed a Welsh in Education Strategic Plan and action plans produced as part of this strategy will be applied to Welsh-medium education and Welsh as a second language. The plan is due to be reviewed in 2018.

The two centres will provide for both English and Welsh speaking pupils and where necessary they will be able to accommodate those pupils who speak Welsh as their first language as there will be access to Welsh speaking members of staff.

Staff – HR records show that staff at Crynallt Primary School have declared their ability of the Welsh Language as 33 Little or No knowledge / 10 Learners/ 3 Fairly Fluent and 1 Fluent. 6 have opted to declare 'Prefer not to say'.

HR records show that staff at Coedffranc Primary School have declared their ability of the Welsh Language as 45 Little or No knowledge / 7 Learners/ 2 Fairly Fluent and 2 Fluent. 2 have opted to declare 'Prefer not to say'.

Could the policy be developed to improve positive impacts or lessen negative impacts? Please give details

The proposal is in its formative stage and is subject to full consultation with stakeholders. The consultation process will inform policy development on this proposal.

Actions (to increase positive/mitigate adverse impact).

Through the staff appointment process, ensure access as appropriate to Welsh speaking staff for pupils at each provision. Close dialogue and liaison with respective school where a pupil has been admitted from the Welsh-medium sector.

Section 4 - Other Impacts:

Please consider how the initiative might address the following issues.

You could base this on service user information, data, consultation and research or professional experience (e.g. comments and complaints).

(a) Equalities

Public Sector Equality Duty (PSED)

- to eliminate discrimination, harassment and victimisation;
- to advance equality of opportunity between different groups; and
- to foster good relations between different groups

Please explain any possible impact on meeting the Public Sector Equality Duty

Establishing the specialist centres within mainstream primary schools breaks down barriers and aids the elimination of discrimination, harassment and victimisation. Both the primary schools and the two centres are inclusive for pupils of all backgrounds. The proposal will promote the understanding of the needs of different groups.

Having the centres attached to mainstream schools allows the pupils attending the centres to have the opportunities to have the same opportunities as their mainstream peers as the centre pupils will be able to access the same curriculum and facilities.

The proposal is likely to have a positive impact and there is no evidence to indicate that the proposal may result in less favourable treatment for particular groups, may give rise to indirect discrimination or more likely to assist or impede in making reasonable adjustments.

The proposal will help to remove or minimise any disadvantage, meet the needs of different groups, and encourage increased participation of particular groups.

What work have you already done to improve the above?

The Council provides for the pupils of Neath Port Talbot who require specialist support for their educational needs at two community special schools and at learning support/ inclusion centres attached to community primary/secondary schools.

Currently there are 11 specialist provisions available in NPT for supporting primary pupils with ALN including those for pupils with Autistic Spectrum Disorder (ASD), Moderate Learning Difficulties (MLD), Speech Language and Communication Difficulties (SPLCD) and Severe and Profound Learning Difficulties (SPLD).

NPT also provides specialist support for pupils aged 3 -5 in Abbey Primary School's Early Years Assessment centre and for pupils 3-11 at Awel Y Môr Pupil Inclusion Centre (PIC) for pupils who present with SEBD and are in need of further assessment.

NPTCBC aspires to deliver an inclusive education service. All schools have policies in place to prevent discrimination, harassment and victimisation both for the benefit of pupils and school staff.

Actions (to mitigate adverse impact or to address identified gaps in knowledge).

The new wellbeing and behaviour continuum ensures that schools and the Council work in partnership to focus on prevention and early intervention in order to meet the needs of vulnerable children and young people and to ensure the best possible outcomes.

(b) Reduce Social Exclusion and Poverty

Please explain any possible impact

The establishment of additional provision for primary aged pupils with SEBD will allow pupils to access the specialist teaching they require which allows each pupil to reach their full potential.

NPTCBC aspires to deliver an inclusive education service. All schools have policies in place to prevent discrimination, harassment and victimisation both for the benefit of pupils and school staff.

NPTCBC tackles poverty and social exclusion through various initiatives including breakfast clubs, free school meals, nurture groups, family learning, Flying Start, Communities First Projects, Catch-up (funded through Pupil Deprivation Grant).

What work have you already done to improve the above?

NPTCBC tackles poverty and social exclusion through various initiatives including breakfast clubs, free school meals, nurture groups, family learning, Flying Start, Communities First Projects, Catch-up (funded through Pupil Deprivation Grant).

Actions (to mitigate adverse impact or to address identified gaps in knowledge).

(c) Community Cohesion

Is the initiative likely to have an impact on Community Cohesion?

The establishment of additional specialist provision for primary aged pupils with SEBD will allow pupils to reach their full potential and provide pupils with the confidence to play an active role in the wider school community and the community where they live.

Actions (to mitigate adverse impact or to address identified gaps in knowledge).

Section 5 Consultation

What consultation and engagement has been undertaken (e.g. with the public and/or members of protected groups) to support the views in section 3 and 4?

The proposal is in its formative stage therefore it will be subject to full consultation with stakeholders.

Any actions required (to mitigate adverse impact or to address identified gaps in knowledge)

The consultation process will identify if any actions are necessary.

Section 6 – Post Consultation

What was the outcome of the consultation?

The proposal is in its formative stage therefore it will be subject to full consultation with stakeholders. Outcomes will be reported to the Council's Education, Skills and Culture Cabinet Board so that Members may make a decision on whether to progress with the proposal. At this stage the views of all stakeholders will be considered.

Section 7 - Monitoring arrangements:

Please explain the arrangements in place (or those which will be put in place) to monitor the impact of this function, service, policy, procedure, strategy, plan or project:

Monitoring arrangements:

By the Council via data received from each school together with reports from School Improvement Officer Core Visits and Estyn Inspection reports. Monitoring will be undertaken by the Headteacher and Governing Body.

Monitoring will also take place via the formal consultation process to be conducted.

Actions:

Section 8 – Outcomes:

Having completed sections 1-5, please indicate which of the outcomes listed below applies to your initiative (refer to guidance for further information on this section).

- Outcome 1: Continue the initiative...
- Outcome 2: Adjust the initiative...
- Outcome 3: Justify the initiative...
- Outcome 4: Stop and remove the initiative...

X



For outcome 3, detail the justification for proceeding here

Section 9 - Publication arrangements:

Any proposal relating to school reorganisation requires an EIA, the findings will be used to inform the formal consultation process. Findings will be considered when compiling the consultation document and where necessary, other documents required for the statutory processes.

Responses received from stakeholders during the consultation process will be considered in any decision making process including any comment in relation to this EIA and any identified impact on any protected group.

Action Plan:

Objective - What are we going to do and why?	Who will be responsible for seeing it is done?	When will it be done by?	Outcome - How will we know we have achieved our objective?	Progress
Consult on the proposal to hear the views of key stakeholders	Director of ELLL, Head of Transformation and SSIP	2017/18 academic year	Decision to implement the proposal at the conclusion of the legislation process	On-going until implementation or abandonment of the proposal
Monitor additional data to check for any impact on the protected characteristics	Director of ELLL, Head of Transformation and SSIP	2017/18 academic year	Actions to mitigate any adverse effect	On-going until implementation or abandonment of the proposal
Monitor findings from the consultation process	Director of ELLL, Head of Transformation and SSIP	2017/18 academic year	Actions to mitigate any adverse effect	On-going until implementation or abandonment of the proposal