## **Equality Impact Assessment (EIA) Report Form**

This form should be completed for each Equality Impact Assessment on a new or existing function, a reduction or closure of service, any policy, procedure, strategy, plan or project which has been screened and found relevant to Equality and Diversity.

Please refer to the 'Equality Impact Assessment Guidance' while completing this form. If you would like further guidance please contact the Corporate Strategy Team or your directorate Heads of Service Equality Champion.

Whe	Where do you work?							
Serv	Service Area: Strategic School Improvement Programme(SSIP)							
Dire	ctorate: E	Education, Lei	sure and Lifeld	ong Learnir	ng (I	ELLL)		
(a) This EIA is being completed for a								
	ervice/ inction	Policy/Procedure	Project	Strategy		Plan	Proposal <b>X</b>	
(b)	Please name and describe below A proposal to close Cymer Afan Comprehensive School, School Road, Cymmer, Port Talbot and transfer the pupils to the new build Ysgol Cwm Brombil at Bertha Road Margam, Port Talbot. Ysgol Cwm Brombil is due to be opened on the 1 <sup>st</sup> September 2018.							
(c)	c) It was initially screened for relevance to Equality and Diversity on 14/06/2018							
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	Name: l	Richard Gordo	n		Na	me: Andrew 1	homas	
	Job title Date: 14	e: SSIP Program 4.6.18	me Manager			<b>title:</b> Head of <b>te:</b> 14.6.18	Transformat	ion

# Section 1 - Aims (See guidance):

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

#### What are the aims?

To close Cymer Afan Comprehensive School with effect from 1<sup>st</sup> September 2019 and make arrangements for the pupils who would normally attend the school to transfer to Ysgol Cwm Brombil, which is due to open on the 1<sup>st</sup> September 2018.

Ysgol Cwm Brombil is a new build school with 21<sup>st</sup> Century facilities, a £30m investment by the Council. Pupils' attainment and achievement improve in new build schools and improvement in the quality of buildings can have a positive impact on the quality of teaching and staff morale, which in turn further impacts on pupil performance.

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 the publication of a statutory notice and a period of objections to be received before a determination is taken.

Neath Port Talbot County Borough Council (NPTCBC) Strategic School Improvement Programme (SSIP) involves reviewing the existing school provision across the County Borough and determining the number and type of schools needed to deliver education effectively and efficiently in the future.

Currently secondary education in the upper Afan Valley is provided at Cymer Afan Comprehensive School as part of a federation of five schools, four primary and one secondary. NPTCBC has reviewed this provision on the basis of:

- educational standards;
- the need for places and the accessibility of schools;
- the quality and suitability of school accommodation; and
- effective financial management.

Cymer Afan Comprehensive is a secondary school with 229 pupils as of January 2018. As it has fewer than 600 pupils, Cymer Afan Comprehensive School is classified as a 'small' secondary school. The school has capacity for 641 pupils, meaning it currently has 64% surplus capacity and pupil numbers are not forecasted to increase sufficiently to change its small secondary school status in the foreseeable future.

In the current financial year (2018/19), Cymer Afan Comprehensive School receives a budget share equivalent to £6,822 per pupil compared to the average for the Council's secondary sector schools of £4,418, a difference of £2,404 per pupil and approx. 54% above the average.

Cymer Afan Comprehensive School has a backlog maintenance and accessibility costs amounting to c.£3m. The site has been assessed and many of the building and mechanical elements are nearing the end of their life span.

#### Who has responsibility?

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

#### Who are the stakeholders?

The impact assessment considers the impacts on:

- staff employed at Cymer Afan Comprehensive School (including governors); and
- pupils that would have received their secondary education at Cymer Afan Comprehensive School from September 2019 onwards.
  - There are two distinct groups of pupils who may be impacted by the proposal. These are pupils who will be attending Cymer Afan Comprehensive who will see disruption to their education and future pupils who will have a different set of choices about where to attend secondary school.

The purpose of the impact assessment is to provide independent information for the decision-making process. It is designed to help policy makers appraise the likely impacts of the proposal on people with characteristics protected under the Equality Act 2010.

The purpose of the impact assessment is to inform rather than determine policy. The objective is not to make the decision, but to assist decision makers through the provision of relevant information. The impact assessment also identifies ways to minimise, mitigate or otherwise manage adverse impacts and identify and optimise beneficial impacts.

Separate to this piece of work NPTCBC have assessed the impact that the proposals may have on local families and the local community through the preparation of a Community Impact Assessment (CIA). <sup>1</sup>

## **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	$\boxtimes$	Race	$\boxtimes$
Disability	$\boxtimes$	Religion or belief	
Gender reassignment		Sex	$\boxtimes$
Marriage & civil partnership	$\boxtimes$	Sexual orientation	
Pregnancy and maternity		Welsh language	
Income deprivation	$\bowtie$		

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

The closure of Cymer Afan Comprehensive School has the potential to impact upon a number of groups with protected characteristics. This proposal relates to the pupils and staff of a maintained secondary school within the NPTCBC area.

NPTCBC have collected information and data on the pupils and staff who may be impacted by the proposal to close Cymer Afan Comprehensive School. This data includes:

- Pupil Level Annual School Census (PLASC) data (January 2017)
- NPTCBC HR records

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<sup>&</sup>lt;sup>1</sup> Neath Port Talbot County Borough Council (date unknown) Neath Port Talbot County Borough Council Impact Assessment the Upper Afan Valley – with a specific focus on Cymer Comprehensive School

- School pupil records
- Staff records

Where appropriate and possible, detailed demographic data has been added. This has been provided for the study area (classified as the catchment area for Cymer Afan Comprehensive School), Neath Port Talbot area, and compared to the Wales national average. The sources of this data include:

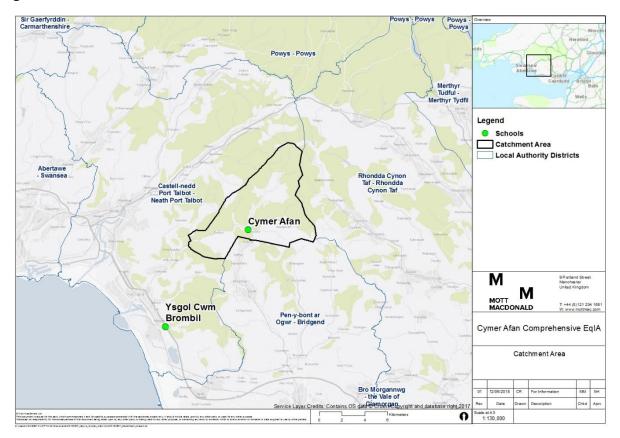
- Office for National Statistics (ONS) Annual Mid-Year Population Estimates (MYE) 2016
- ONS Census 2011

The spatial scope of the impact assessment is the catchment area for the Cymer Afan Comprehensive School, which includes the wards;

- Cymmer
- Gwynfi
- Glyncorrwg

The spatial scope is set out in figure 1 below.

Figure 1 Catchment area



#### **Age**

#### **Pupils**

Cymer Afan Comprehensive School serves pupils aged 11-16 years.

Table 1: Pupil age profile

	age prome		
Year group	Likely age ranges	Pupil count	Percentage
7	11-12	51	22%
8	12-13	57	25%
9	13-14	40	17%
10	14-15	34	15%
11	15-16	48	21%

Source: Pupil records 2017

There are also 57 Year 5 pupils and 47 Year 6 pupils in the primary schools that serve the Afan Valley who will be affected by this proposal.

#### **Staff**

Cymer Afan Comprehensive School currently employs 64 members of staff. The age profile of the current staff is detailed below:<sup>2</sup>

**Table 2: Staff age profile** 

Age	Staff count	Percentage
18-24	6	9%
25-34	10	15%
35-44	16	25%
45-54	16	25%
55-64	16	25%
65+	1	2%

Source: Staff records 2017

## Community

The age profile of the study area in comparison to Neath Port Talbot and Wales averages is:

- in line for ages 5-16 years (13% for all three);
- slightly higher for ages 9-11 years (4% vs 3% for both); and
- in line for ages 11-14 years (4% for all three).

Table 3: Local area and comparator populations aged 5-16 years

	Population	Population aged 5 to 16	Population aged 5 to 16 %
Study Area	5,142	679	13%
<b>Neath Port Talbot</b>	141,678	18,608	13%

<sup>&</sup>lt;sup>2</sup> This has been calculated using year of birth against age upon 01/01/2019

Wales	3,113,150	418,616	13%
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Source: MYE 2016

Table 4: Local area and comparator populations aged 9-11 years

	Population	Population aged 9 to 11	Population aged 9 to 11 %		
Study Area	5,142	184	4%		
Neath Port Talbot	141,678	4,712	3%		
Wales	3,113,150	104,770	3%		

Source: MYE 2016

Table 5: Local area and comparator populations aged 11 to 14 years

	Population	Population aged 11 to 14	Population aged 11 to 14 %		
Study Area	5,142	212	4%		
Neath Port Talbot	141,678	5,938	4%		
Wales	3,113,150	131,937	4%		

Source: MYE 2016

## **Disability**

#### **Pupils**

The school is a mainstream school, providing education for pupils with additional learning needs in a mainstream setting. Currently the school includes:

- 5 pupils who have statements of special educational needs;
- 32 pupils on School Action Plus; and
- 40 pupils on School Action.<sup>3</sup>

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

#### **Staff**

Staff records show that there are no members of staff at Cymer Afan Comprehensive School who have declared that they have a disability.

## Community

The proportion of people with a limiting long-term illness (LLTI) is higher in the school's catchment area than both the Neath Port Talbot and Wales averages: 35% compared to 28% and 22% respectively.

<sup>&</sup>lt;sup>3</sup> School Action are interventions for SEN pupils identified by teachers as requiring additional support and School Action Plus are interventions with advice/support from outside specialists; National Assembly for Wales (2004) Special Educational Needs Code of Practice for Wales

Figure 2 below shows that the highest densities of people living with an LLTI are largely clustered around Cymer Afan Comprehensive School (the area with the highest population density).

Figure 2 LLTI population density map

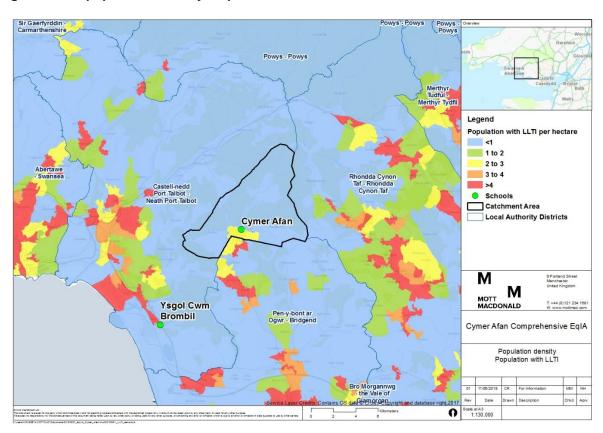


Table 6: Local area and comparator populations with LLTI

	Population	Population with LLTI	Population with LLTI%
Study Area	5,142	1,817	35%
Neath Port Talbot	141,678	39,112	28%
Wales	3,113,150	695,855	22%

Source: Census 2011/ MYE 2016

Table 7: Local area and comparator populations with LLTI aged 0-9 years

	Population	LLTI aged 0-9	LLTI aged 0-9 %
Study Area	5,142	36	1%
Neath Port Talbot	141,678	667	0%
Wales	3,113,150	11888	0%

Source: Census 2011/ MYE 2016

Table 8: Local area and comparator populations with LLTI aged 10-15 years

	Population	LLTI aged 10 to 14	LLTI aged 10 to 14 %
Study Area	5,142	41	1%
Neath Port Talbot	141,678	567	0%
Wales	3,113,150	10200	0%

## **Race and ethnicity**

## **Pupils**

Pupil Level Annual School Census (PLASC) data shows that the school only has one BAME (black, Asian and minority ethnic) pupil, who has declared their ethnicity as 'other Chinese'.

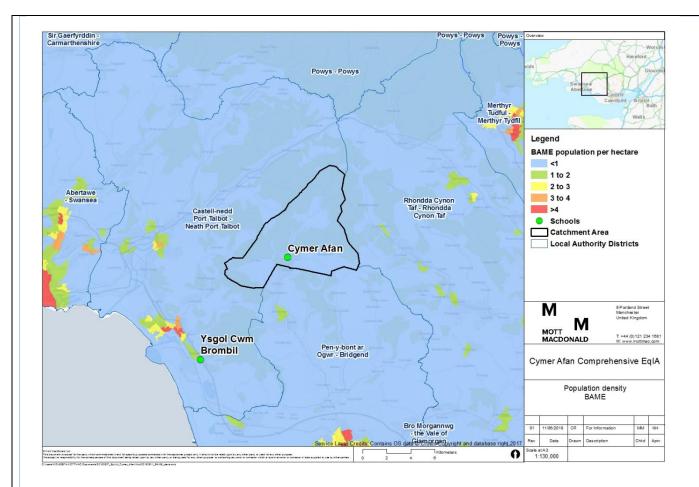
#### **Staff**

HR records show that staff at the school have declared their nationality as 16 British, 46 Welsh, and 2 prefer not to say.

## Community

Figure 3 below demonstrates that the catchment area has a very low BAME population per hectare (less than one per hectare for all).

Figure 3 BAME populations density map



The study area has a low proportion of BAME children aged 0-9 and 10-15 years; this is in line with the figures for Neath Port Talbot and Wales.

Table 9: Local area and comparator BAME populations aged 0-9 years

	Population	BAME aged 0-9	BAME aged 0-9 %
Study Area	5,142	16	0%
Neath Port Talbot	141,678	662	0%
Wales	3,113,150	32,511	1%

Source: Census 2011/ MYE 2016

Table 10: Local area and comparator BAME populations aged 10-15 years

	Population	BAME aged 10-15	BAME aged 10-15 %
Study Area	5,142	6	0%
<b>Neath Port Talbot</b>	141,678	333	0%
Wales	3,113,150	15,199	0%

Source: Census 2011/ MYE 2016

## Religion or belief

## **Pupils**

The school is not a faith school and religion or belief is not a criterion under NPTCBC's Admissions Policy.

The religion and belief profile of the school is:

- 61 Christian
- 2 Church of Wales

All other pupils (approximately 166) left the religion option blank or declared no religion.

#### Staff

Staff data held on religion/belief is according to what individuals have chosen to disclose. No data is held for any of the staff.

## Community

The religion and belief profile of the study area in comparison to Neath Port Talbot and Wales averages is:

- in line with the Neath Port Talbot area, and slightly lower than the figure for Wales for ages 0-9 years (1% vs 1% and 3%); and
- in line with the Neath Port Talbot and Wales averages for ages 10-15 years (0% for all three).

Table 11: Local area and comparator minority faith populations aged 0-9 years

	Population	Minority faith aged 0-9	Minority faith aged 0-9 %
Study Area	5,142	8	0%
<b>Neath Port Talbot</b>	141,678	1,917	1%
Wales	3,113,150	96,306	3%

Source: Census 2011/ MYE 2016

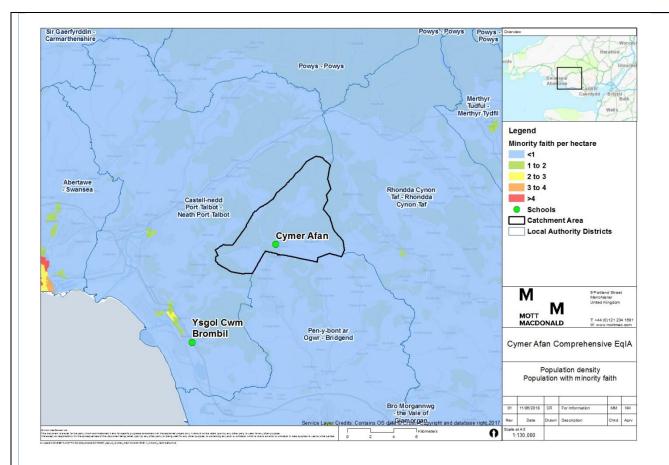
Table 12: Local area and comparator minority faith populations aged 10-15 years

	Population	Minority faith aged 10-15	Minority faith aged 10-15 %
Study Area	5,142	8	0%
Neath Port Talbot	141,678	203	0%
Wales	3,113,150	13,074	0%

Source: Census 2011/ MYE 2016

Figure 4 below demonstrates that the catchment area had a very low minority faith population (minority faith groups include Muslim, Hindu, Sikh, Jewish, Buddhist and Other religion) per hectare (less than one percent across all minority faith groups).

Figure 4 Minority faith populations density map



#### Sex

## **Pupils**

Cymer Afan Comprehensive School admits both boys and girls. The sex profile of the school is detailed below in table 13.

Table 13: Pupil sex profile

	Pupil count   Percentage	
Female	121	53%
Male	108	47%

Source: Pupil records 2017

#### Staff

The school employs both male and female staff members. The sex profile of the current staff is detailed below.

Table 14: Staff sex profile

	Staff count   Percentage	
Female	46	72%
Male	18	28%

Source: Staff records 2017

#### **Pregnancy and maternity**

#### **Pupils and staff**

At the time of this assessment, NPTCBC is not aware of any pupil being pregnant at the school.

No data is available for staff. NPTCBC has policies in place to cover those members of staff who are pregnant or on maternity leave/paternity leave.

#### **Gender reassignment**

## **Pupils and staff**

Data on gender reassignment is held according to what individual pupils and staff have chosen to disclose. No data is held for any of the pupils or school staff on their gender status.

## Marriage and civil partnership

#### **Pupils**

This protected characteristic is not applicable to pupils due to their age.

#### **Staff**

The current marriage and civil partnership profile of the current staff is detailed below.

Table 15: Staff marriage/civil partnership profile

	Staff count	Percentage
Married	35	55%
Single	19	30%
Divorced	4	6%
Partnered	3	5%
Widowed	3	5%

Source: Staff records 2017

#### Sexual orientation

#### **Pupils and staff**

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

## **Income deprivation**

#### **Pupils**

Although income deprivation is not a protected characteristic as defined by the Equalities Act 2010, children from an economically deprived background can have a different experience of transferring schools.

Children may be entitled to receive free school meals if their parents/carers are in receipt of certain benefit/support payments, including Income Support and Universal Credit. The Institute of Fiscal Studies suggests the following advantages to using eligibility for free school meals as

criteria to measure income deprivation:

- It defines income deprivation at the pupil level rather than LSOA level.
- It better reflective of the relative income deprivation of the school and local area.<sup>4</sup>

## Table 16: Local area and comparator free school meal eligibility

	%
<b>Cymer Afan Comprehensive School</b>	38%
Local Authority	23%
Wales	18%

Source: NPTCBC EIA

## Community

The study area is in an area of acute deprivation; 100% of the study area is either in the most or second most deprived quintile, this is in comparison to 59% of Neath Port Talbot and 39% of Wales.

Table 17: Local area and comparator populations with deprivation

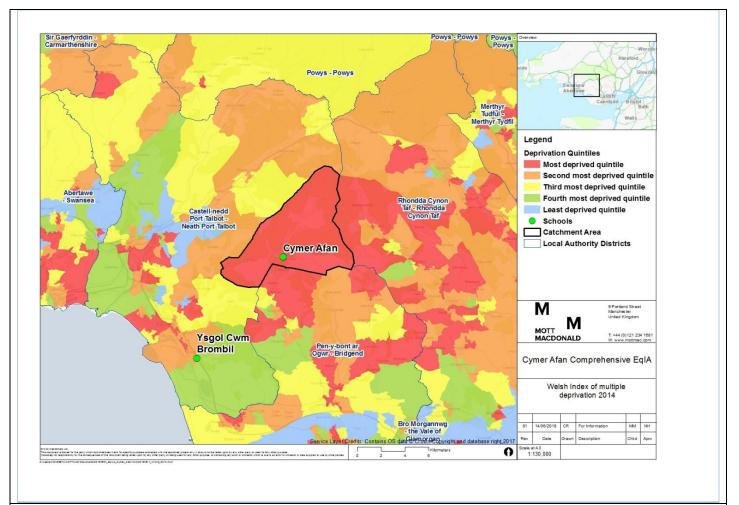
	Denulation	Deputation living in the Deputation living in the		
	Population	Population living in the	Population living in the	
		most or second most	most or second most	
		deprived quintile	deprived quintile%	
Study Area	5,142	5,142	100%	
<b>Neath Port Talbot</b>	141,678	84,065	59%	
Wales	3,113,150	1,226,953	39%	

Source: WIMD 2014

Figure 5 Deprivation map

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<sup>&</sup>lt;sup>4</sup> IFS (2013) A comparison of commonly used socio-economic indicators: their relationship to educational disadvantage and relevance to Teach First, available at: https://www.ifs.org.uk/comms/r79.pdf



## **Any Actions Required?**

NPTCBC have recommended that data on protected characteristic continues to be monitored and checked to understand if the proposal has any impact upon them in the NPT area.

# (b) General

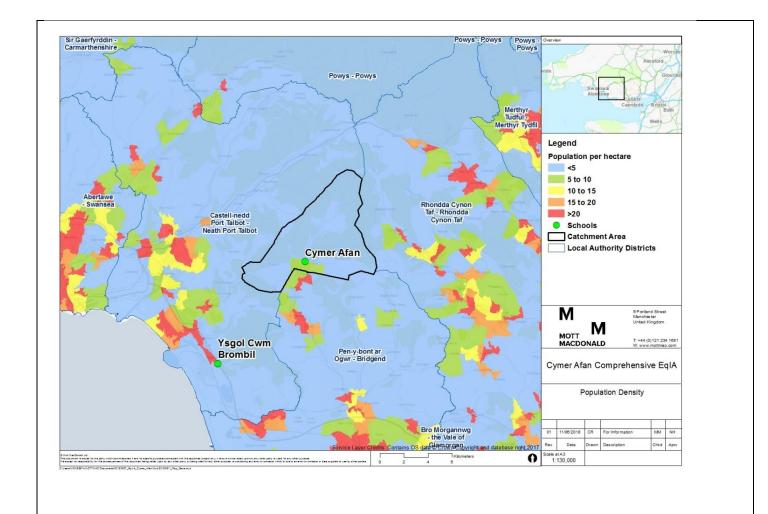
## What information do you know and how is this information collected?

The spatial scope of the impact assessment is the catchment area for the Cymer Afan Comprehensive School which includes the wards:

- Cymmer
- Gwynfi
- Glyncorrwg

The figure below illustrates the overall population density for the study area. It shows that the overall population density is low but that the highest densities of people live predominantly in the south of the area, around Cymer Afan Comprehensive School.

#### Figure 6 Population density map



# **Any Actions Required?**

NPTCBC have recommended that data on pupils, staff and governors continues to be monitored and checked to understand if the proposal has any impact upon them in the NPT area.

# 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 Disability Gender reassignment Marriage & civil partnership Pregnancy and maternity Race Religion or belief Sex Sexual orientation Welsh language Income deprivation				

#### Overall impact on staff

Overall there will be impacts on all staff who are made redundant following the closure of Cymer Afan Comprehensive School.<sup>5</sup>

These impacts include:

- Financial (immediate loss of ongoing income, financial uncertainty, potential debt, concerns around home ownership and mortgage repayments).
- **Health** (stress, anxiety and depression).

#### Overall impact on pupils

Overall there may be impacts on all pupils who currently attend Cymer Afan Comprehensive School and make the transfer. Pupils may experience anxiety and stress relating to the change in school, such as adapting to new routines, staff, facilities and peers.

There is also likely to be an increase in travel time for pupils transferring to the new school site. This may in turn result in personal impacts, as well as impacts on educational attainment as additional travel time can lead to increased tiredness, and result in a reduction in the time available for school work at home.

### <u>Age</u>

## **Pupils**

As pupils are children, this group will be disproportionately impacted by the closure of Cymer Afan Comprehensive School. Those who are already attending Cymer Afan Comprehensive School are likely to have differing experiences to those who will start at Ysgol Cwm Brombil in Year 7 as they will be transferring schools and seeing a change in education provision.

#### Staff

For older staff members who are made redundant from the school closure, there are potential disproportionate negative impacts. Research suggests that those who are older when they are made redundant experience barriers in returning to employment, potentially facing challenges in securing interviews for new positions. 6 According to Age UK research, once unemployed, only 23% of people aged 50 years or above secured a new job in three months (compared to 35% of 35-49-year olds).

## **Disability**

#### **Pupils**

There are potential negative impacts associated with transferring schools for some pupils who are disabled. For example, pupils with autism spectrum conditions may experience difficulties in the transfer process that can negatively affect educational attainment and general wellbeing. These pupils may find adapting to the routines, expectations and social relationships of a new school environment more challenging than others.8

Local authorities are required to assess the travel needs of learners who are aged under 19 in their area. This includes those who they are legally required to provide transport for and those for whom they may wish to provide discretionary transport when assessing travel needs. An authority is also required to have regard for the needs of disabled learners and

<sup>5</sup> Leeds University Business School (2004): 'The Economic and Social Impact of Redundancies from Corus and Allied Steel and Wire in Wales'

<sup>&</sup>lt;sup>6</sup> Leeds University Business School (2004): 'The Economic and Social Impact of Redundancies from Corus and Allied Steel and Wire in Wales' 7 Age UK (2013): Older Workers at High Redundancy Risk available at: https://www.ageuk.org.uk/latest-press/archive/older-workers-at-highredundancy-risk/

<sup>&</sup>lt;sup>8</sup>University of Manchester (undated), The impact of primary-secondary school transition for children with autism spectrum conditions: a longitudinal, mixed-methods study, available at: http://documents.manchester.ac.uk/display.aspx?DocID=20008%20

learners with learning difficulties. Disabled learners may have specific transport requirements (or reasonable adjustments under the Equality Act 2010 required for this) which may result in increased transport costs. The Equality Act 2010 prohibits an authority charging for any reasonable adjustments it has made for disabled learners.<sup>9</sup>

#### **Staff**

The evidence review does not currently indicate any disproportionate or differential impacts for this protected characteristic group.

#### **Gender Reassignment**

## **Pupils and staff**

The evidence review does not indicate any disproportionate or differential need for this protected characteristic group.

## Marriage and civil partnership

## Pupils and staff

The evidence review does not currently indicate any disproportionate or differential impacts for this protected characteristic group. Due to their age, pupils have been scoped out.

## **Pregnancy and maternity**

### **Pupils and staff**

The evidence review does not currently indicate any disproportionate or differential impacts for this protected characteristic group.

#### Race

#### **Pupils**

There are potential positive impacts associated with transferring schools for pupils regarding views on race and ethnicity:

Research suggests that mixed schools (defined as schools with intergroup contact) result in more social mixing between ethnic groups, and that pupils generally have more positive attitudes towards those from different ethnic groups.<sup>10</sup> The current demographic makeup of Cymer Afan Comprehensive School (as described in section 2) would likely mean that pupils at this school would not report having close outgroup friends towards the end of their first year of secondary school.

#### Staff

The evidence review does not currently indicate any disproportionate or differential impacts for this protected characteristic group.

## Religion or belief

### **Pupils and staff**

The evidence review does not currently indicate any disproportionate or differential impacts for this protected characteristic group.

#### Sex

#### **Pupils**

There are potential negative impacts associated with transferring schools for pupils of different sex:

<sup>9</sup> National Welsh Assembly (2016) Home to school transport - a guide for constituents

Department for Education (2017), Diversity and Social Cohesion in Mixed and Segregated Secondary Schools in Oldham, available at: <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/634118/Diversity\_and\_Social\_Cohesion\_in\_Oldham\_schools.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/634118/Diversity\_and\_Social\_Cohesion\_in\_Oldham\_schools.pdf</a>

- Due to the disruptive nature of transition, which requires students to adapt previously-learned behaviour patterns to new demands and more challenging environments. This may have a strong negative impact on peer relations and the students' academic achievement. Research indicates that boys can find adapting to a new school routine more challenging than girls, as boys self-report increases in school problems during transition periods.
- Girls can find forming new friendship groups more challenging than boys, with research suggesting that girls perceived that close friend support and school support declined during transition.<sup>11</sup>

#### Staff

Stress and anxiety associated with redundancy may disproportionately impact upon women, as research indicates that women are nearly twice as likely to experience anxiety as men. and that women are more likely than men to have a common mental health problem. 12

Experiences of stress repeatedly over a prolonged period, can impact sleep, memory, eating habits. Research has also linked long-term stress to gastrointestinal conditions like Irritable Bowel Syndrome (IBS), or stomach ulcers as well as conditions like cardiovascular disease. 13

#### Sexual orientation

## **Pupils and staff**

The evidence review does not currently indicate any disproportionate or differential impacts for this protected characteristic group.

#### Welsh language

## Pupils and staff

As both schools are English-medium, there is no likely impact on the Welsh language because of the closure of Cymer Afan Comprehensive School.

#### Income deprivation

#### Pupils

Although income deprivation is not a protected characteristic as defined by the Equalities Act 2010, children from an economically deprived background can have a different experience of transferring schools. Research conducted by the Joseph Rowntree Foundation indicates that deprived children are more likely to feel anxious and unconfident about school than wealthier peers. 14

The requirement to purchase a new school uniform may disproportionately impact upon lower income families. Often, where possible, uniforms are 'handed down' within lower income families – this would no longer be possible as children would now attend a different school with a different uniform requirement. The Children's Society estimates that the average yearly spend on secondary school uniforms totals £316, and that a guarter of a million UK children attend a school based on the cost of the uniform. 15

<sup>13</sup> Mental health foundation (undated) Stress

<sup>&</sup>lt;sup>11</sup> R. Hanewald (2013): Transition Between Primary and Secondary School: Why it is Important and How it can be Supported available at: http://ro.ecu.edu.au/cgi/viewcontent.cgi?article=1952&context=ajte

Mental health foundation (undated) mental health statistics: anxiety

<sup>&</sup>lt;sup>14</sup> JRF (2007): Experiences of poverty and educational disadvantage, available at: https://www.jrf.org.uk/sites/default/files/jrf/migrated/files/2123.pdf 15 The Children's Society (2015): Cost of School for Children in Poverty, available at: https://www.childrenssociety.org.uk/sites/default/files/Queen%27s%20Speech%20-

<sup>%20</sup>Cost%20of%20School%20for%20Children%20in%20Poverty.pdf

As local authorities have a legal duty to provide free home to school transport for learners of compulsory school age (for those attending secondary school the distance is pupils who live 3 miles or further from their nearest suitable school) pupils from families with low incomes are likely not to be impacted by any increased travel costs. <sup>16</sup>

#### Staff

The evidence review does not currently indicate any disproportionate or differential impacts for this protected characteristic group.

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.

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

#### **Enhancements and mitigations**

#### All pupils:

Possible enhancement or mitigation measures may include:

- Informing pupils of transition arrangements; vulnerable students could be supported through the existing intervention facility at Cymer Afan Comrepensive School.
- Regular correspondence with parents/carers to ensure that they are aware of changes.
- Special taster sessions for new pupils at the new school so that pupils are aware of the layout of the school and can meet their peers.

## Disability:

Currently 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, to ensure that any impacts caused by the transfer process are minimised it is recommended that a transition plan is put in place for each pupil. This could include:

- Regular correspondence with parents/carers to ensure that they are aware of changes.
- Special taster sessions for new pupils at the new school so that pupils are aware of
  the layout of the school this could be arranged on weekends for those with autism
  to allow them to explore the new school in a quiet environment. The Council's
  Support for Learning service can provide additional support from specialist teaching
  and support staff for pupils with Autism during transition and through the early
  stages of attending the new school.

#### Race:

To enhance the possible positive impacts, actions may include:

- Encouraging socialising/mixing between pupils who transfer from Cymer Afan Comprehensive School to establish new peer/friendship groups. This could include:
  - Special taster sessions for new pupils at the new school so that pupils can meet their peers.
  - Organised social activities across a range of interests including sport, drama

<sup>&</sup>lt;sup>16</sup> National Welsh Assembly (2016) Home to school transport - a guide for constituents

- and music.
- Transportation from Ysgol Cwm Brombil to allow for after-school activities and extra-curricular activities.

#### Sex:

To help minimise the possible negative impacts may include:

- Communicating to parents and educational professionals the potential need to be more sensitive and responsive to students, so that they feel nurtured and supported during the transition period. 17
- Special taster sessions for new pupils at the new school so that pupils are aware of the layout of the school, the timetable and the teachers and are aware of the new school routine in advance
- Encouraging socialising/mixing between pupils who transfer from Cymer Afan Comprehensive School to establish new peer/friendship groups. This could include
  - Special taster sessions for new pupils at the new school so that pupils can meet their peers

# (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

The school is an English-medium school, therefore pupils are taught through the medium of English, although Welsh is taught as a second language in line with the National Curriculum. It is proposed that pupils will transfer to Ysgol Cwm Brombil, which is also an English-medium school.

In addition, a separate Welsh Language Impact Assessment has been undertaken to assess potential impacts the closure may have on the Welsh Language. This Impact Assessment concluded that 'Welsh language standards are good at Dyffryn School and combined with the advantages of a larger pupil cohort where there will be more opportunities to develop Welsh language skills, transfer to Ysgol Cwm Brombil should result in a positive impact on Welsh language development for Cymer Afan Comprehensive school pupils. As such, the Council is satisfied that provision for Welsh language will be at least comparable with the provision currently offered at Cymer Afan Comprehensive school.'

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.

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

Actions (to increase positive/mitigate adverse impact).

Action any points raised as part of the Welsh in Education Strategic Plan

<sup>&</sup>lt;sup>17</sup> R. Hanewald (2013): Transition Between Primary and Secondary School: Why it is Important and How it can be Supported available at: http://ro.ecu.edu.au/cgi/viewcontent.cgi?article=1952&context=ajte

## **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

This EqIA has been undertaken in partial fulfilment of NPTCBC's obligations under current UK equality legislation, and in particular the Equality Act 2010. The Public Sector Equality Duty (PSED) is set out at section 149 of the Equality Act and is provided in full in Figure 7 below. The PSED requires that public authorities – such as government departments, public bodies, and those responsible for public functions, including the Council – have due regard to its requirements in the exercise of their functions.

The PSED requires public bodies to consider all individuals when carrying out their day to day work – in shaping policy, in delivering services and in relation to their own employees.

NPTCBC aspires to deliver an inclusive education service. In order to meet PSED requirements, all schools have policies in place to prevent discrimination, harassment and victimisation both for the benefit of pupils and school staff. The policies are overseen by the governing body and the Council.

## Figure 7: Article 149 of the Equality Act 2010: The Public Sector Equality Duty

- (1) A public authority must, in the exercise of its functions, have due regard to the need to—
  - (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
  - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
  - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- (2) A person who is not a public authority but who exercises public functions must, in the exercise of those functions, have due regard to the matters mentioned in subsection (1).
- (3) Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to—
  - (a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
  - (b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
  - (c) encourage persons who share a relevant protected characteristic to participate in

# public life or in any other activity in which participation by such persons is disproportionately low.

Source: Equality Act 2010

Public authorities must demonstrate that they have shown due regard to the aims of the PSED throughout the policy process. The PSED is intended to support good decision-making – it encourages public bodies to understand how different people will be affected by their activities. This means policies and services are appropriate and accessible to all and meet different people's needs.

The two schools are approximately 10 miles apart, requiring pupils to travel an alternative route to school. The Council aims to assess relevant routes for their suitability, and will make arrangements for eligible pupils to receive free school transport. School journey and the travel times will be appropriate for pupils aged 11 to 16 years.

It is recognised that the proposal will have a negative impact on the staff due to loss of employment. Staff may have the opportunity to apply for positions at schools elsewhere, as will governors, although the arrangements for federation in the upper Afan Valley will continue.

The Council has secured an 'employer's pledge' with schools whereby school governing bodies have agreed to consider staff facing redundancy at any Neath Port Talbot County Borough Council school. For those staff members who are employees of centrally delivered catering and cleaning services due to the flexibility of this service there may be opportunities within the service area for staff to transfer to other schools or venues. Other school support staff will be supported by the relevant school policies and procedures which will include full consultation. Employees identified at risk of redundancy will be given access to the Council's prior consideration register. Previous experience has shown that some staff wish to secure employment in an alternative school but others take the opportunity to take on new challenges elsewhere. The Council is proud of its track record for supporting staff in such situations.

Pupils and staff would be transferring to a new build school which will be a state of the art 21<sup>st</sup> Century school and therefore will be fully compliant in terms of the requirements for disabled pupils.

#### What work have you already done to improve the above?

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. This EqIA has been undertaken in partial fulfilment of NPTCBC's obligations under current UK equality legislation. Mott MacDonald and NPTCBC have set out potential positive and negative impacts that may occur because of the proposal to close Cymer Afan Comprehensive school.

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

# (b) Reduce Social Exclusion and Poverty

## Please explain any possible impact

As detailed in section 2, 38% Cymer Afan Comrepensive School currently has a higher than average proportion of pupils eligible for free school meals (eFSM); the average for the Local Authority is 18% and 23% for Wales.

The school has an above average population of pupils who are deemed to have additional learning needs, (40%). The school also has a minority population of pupils who are looked after children (1.9%).

### What work have you already done to improve the above?

NPTCBC detail that currently Cymer Afan Comrepensive School use most of their Pupil Development Grant (PDG), on staffing costs for teaching assistants to provide intervention programmes to improve pupil outcomes and wellbeing. This inlcudes the resourcing of an intervention facility managed by two members of staff who work one to one with pupils from vulnerable groups in an effort to improve literacy and numeracy skills.

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

If appropriate, the work of the existing intervention facility at Cymer Afan Comrepensive School should be continued or transition plans be put in place for students being supported by the intervention facility.

NPTCBC detail that the PDG plan for Dyffryn (Dyffryn School is used by the Council as a proxy for the new school) is also focused on staffing costs, in this instance for teaching staff who target eFSM pupils in a range of intervention programmes to improve pupil outcomes and wellbeing. NPTCBC believe there are effective systems in place to track the progress of eFSM pupils.

#### Currently, at both schools:

- engagement officers work closely with individual pupils to support them in developing their emotional wellbeing and resilience so that they are more equipped to deal with the challenges that school presents and that often act as barriers to their learning; and
- literacy and numeracy support officers work with individual eFSM pupils identified as needing additional support.

NPTCBC believe that as Dyffryn School offers at least the same level of support for eFSM and vulnerable pupils as Cymer Afan Comprehensive the efforts to reduce social exclusion and poverty will continue.

# (c) Community Cohesion

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

There are potential positive impacts associated with transferring schools for pupils regarding community cohesion. Research suggests that mixed schools (defined as schools with intergroup contact) result in more social mixing between ethnic groups, and that pupils generally have more positive attitudes towards those from different ethnic groups. In contrast, in predominately White-British schools, pupils in the study reported having no close outgroup friends towards the end of their first year of secondary school. Cymer Afan Comprehensive School has only one BAME pupil; BAME pupils at Dyffryn School (the secondary school currently serving the area) represent 8% of the pupil cohort. The additional BAME cohort increases opportunities for cultural awareness and integration, and positively supports community cohesion.

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

Actions to enhance the possible positive impacts may include:

- Encouraging socialising/mixing between pupils who transfer from Cymer Afan Comprehensive School to establish new peer/friendship groups. This could include:
  - Special taster sessions for new pupils at the new school so that pupils can meet their peers.

## **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?

On 9<sup>th</sup> November 2017, the Neath Port Talbot Council's Education, Skills and Culture Cabinet board decided to consult on the future of education in the upper Afan Valley. A consultation of stakeholders at the Cymer Afan Comprehensive School, interested parties and the wider community was undertaken between 11<sup>th</sup> December 2017 to 14<sup>th</sup> February 2018. The full list of consultees is available in Appendix A of the 'Future of Secondary Education in the Upper Afan Valley Consultation Report' (2018). Mott MacDonald was not involved in the consultation process, and did not undertake any stakeholder, community or service user engagement for the purpose of creating this report.

Through this consultation, stakeholders expressed a number of concerns related to the potential equality impacts of the proposal to close Cymer Afan Comprehensive School. The impacts that were identified by stakeholders were understood to have the potential to affect those with a disability and children aged 16 and under, which are protected characteristics under the Equality Act 2010, as well as those suffering from deprivation, who would also be vulnerable to the effects of the decision.

## Impacts on deprived pupils

Through this consultation, concerns were raised about the impact of moving school on

<sup>&</sup>lt;sup>18</sup> Department for Education (2017), Diversity and Social Cohesion in Mixed and Segregated Secondary Schools in Oldham, available at: <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/634118/Diversity\_and\_Social\_Cohesion\_in\_Oldham\_schools.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/634118/Diversity\_and\_Social\_Cohesion\_in\_Oldham\_schools.pdf</a>

vulnerability of deprived students, who are already a vulnerable group, as moving schools is an indicator of deprivation for the local authority's Vulnerability Assessment Profile (VAP).

- NPTCBC responded by stating that moving schools is included in the VAP because
  pupils who move many times during their school years can increase risk of
  underachievement, and that the purpose of the VAP is not only to identify vulnerable
  pupils, but also to ensure the school and local authority plan and provide for their
  needs and provision.
- NPTCBC believes that the impact of the proposal would remain the same in this
  regard, as the pupils that have been identified by the VAP will still be included in and
  catered to by this tool.

Stakeholders also raised concerns about the potential negative impacts of moving from a smaller school to a larger school on academic performance, and how this would specifically impact on deprivation.

- NPTCBC responded that Estyn's report 'School Size and Educational Effectiveness'
  (December 2013) suggests that larger schools of 1,101 pupils or more outperform
  small secondary schools of less than 600 pupils, and that larger schools were found
  to require less significant improvement or special measures, and were found to have
  greater pupil well-being
- NPTCBC reported that Neath Port Talbot has the second highest number of pupils
  entitled to free school meals in Wales, and that it could be argued that all schools in
  the County Borough are affected by deprivation to some degree (which implies that
  the impact of school size is negligible).

## Impacts on pupils with a disability

Through this consultation, concerns were raised around the impact of losing existing successful working relationships between Additional Learning Needs (ALN) pupils and staff at Cymer Afan Comprehensive School.

The response to this from the council was that all schools are required to make provisions for pupils with ALN, and both Cymer Afan Comprehensive and Dyffryn School have ALN pupils (Dyffryn School is used by the Council as a proxy for the new school). Dyffryn School have around 200 (24%) pupils with ALN, and they have introduced a range of strategies, including the use of a school-based counsellor, to improve pupil resilience and well-being. Council has also stated that the intervention programmes taking place in the Place of Development (POD) facility, which has been reported by Estyn in 'Inspection report Cymer Afan Comprehensive School (2015) to be of high quality, are similar to the programmes taking place in all secondary schools in Neath Port Talbot. For example, the Emotional Literacy Support (ELSA) programme, which is provided by the POD, is also provided at Dyffryn School.

- NPTCBC believes that the support currently received by ALN pupils at Cymer Afan Comprehensive is likely to be of at least the same standard if they transfer to Ysgol Cwm Brombil, and that Cymer Afan Comprehensive's robust and thorough identification and monitoring of ALN pupils' needs, and the creation of high quality individual education plans, will all aid in the transition to Ysgol Cwm Brombil. The transition will be supported by work between Cymer Afan Comprehensive and Ysgol Cwm Brombil to ensure each pupil's statement or individual education plan has been reviewed, and appropriate provisions have been made.
- Additionally, Ysgol Cwm Brombil has appointed a Special Education Needs
   Coordinator (SENCO) and an Additional Learning Needs Coordinator (ALNCO) to
   oversee the range of needs that will be present in the new school, and an area of the

building has already been designated as a student services hub, where all pupils can access support services.

### Impacts on children aged 16 and under

During the consultation, stakeholders raised concerns related to impacts of closing Cymer Afan Comprehensive and moving school on children aged 16 and under. These included comments on the impact of moving to a school that could be of lesser quality, the disruption in learning caused by closing the school, and the impact of longer travel distances and travel times to and from school on the children's health, well-being and education.

- NPTCBC responded to the concern about the impact of moving to a school of potential lesser quality by explaining that statistics published by the Wales National School Categorisation System for 2016 and 2017 imply that Dyffryn School is outperforming Cymer Afan Comprehensive in GCSE achievement. Dyffryn School has also been categorised as a 'green' support category school for 2017-2018, indicating that it requires the least support and is a highly effective school with a track record in maintaining a high level of learner outcomes, whereas Cymer Afan Comprehensive School is within the 'yellow' support category, which indicates that it requires slightly more support, and is an effective school with a track record in maintaining good learner outcomes. Estyn stated that overall, the proposal is likely to at least maintain the standards of education and provision in the area.
- NPTCBC responded to the concern about the impact of disruption in learning caused by closing the school by stating that should the proposal be approved, pupils will start as a group at Ysgol Cwm Brombil in September 2019, the beginning of the school year, and this move will be preceded by planned transition events for pupils, regular staff meetings to discuss pupils, curriculum arrangements. ALN support, and other endeavours to support the move. In addition, care will be taken to plan for pupils in Year 10 and 11 who will be sitting GCSE examinations at the time of the move, in order to minimise disruptions.
- NPTCBC also suggested that the move will probably not have a detrimental impact on attainment, as data suggests this was the case during a similar recent transition of pupils to Ysgol Bae Baglan.

A comment was raised by a stakeholder around the impact of losing the expertise of secondary school teac0hers, who currently provide some specialist curriculum to primary pupils.

NPTCBC responded that it is the case that if the secondary school were to close then
secondary staff who work across the federation may no longer be available and the
delivery of some more specialist curriculum areas in the primary schools could be
lost. It is anticipated that a partnership between Ysgol Cwm Brombil and partner
primary schools in the upper Afan Valley will be developed further and could include
similar specialist teaching as is currently experienced.

A number of stakeholders were concerned about the potential detrimental impacts of the long bus journey to the new school on the children's health, safety and education.

- NPTCBC acknowledged that for some pupils the ability to walk or cycle from home to school will be lost under this proposal, which has detrimental impacts on health. To mitigate this, the school will provide curricular and extra-curricular opportunities to take part in activities that promote fitness and health, and opportunities to learn about the importance of a healthy lifestyle.
- NPTCBC also noted that current school travel arrangements have pupils travelling to Cymer Afan Comprehensive by bus, and that future arrangements can be made to have the bus pick students up at points that would better facilitate walking or cycling to the bus stop. The council found travel by bus to the new school to be the most reasonable mode of transport, and that the journey time is of a reasonable length (45)

- minutes to the farthest community each way) when compared to standards from England and Northern Ireland (75 minutes each way, and a combined journey time of 2.5 hours respectively).
- NPTCBC responded to concerns raised around the impact of the long journey on well-being by explaining that discussions with pupils imply that the experience of the bus journey is an individual experience, which can either increase stress and anxiety, or be an enjoyable and productive experience, and that evidence implies that the journey should not have a significant impact on well-being.

Additional comments were made by multiple stakeholders regarding the potential detrimental health impacts of increased pollution, due to increased road travel to and from the new school.

- NPTCBC is encouraging families to make use of the free home to school travel services. To address concerns around impacts on education due to having to rise earlier for the journey, and potentially spending less time participating extra-curricular activities including visiting the pool and the library.
- NPTCBC responded that though pupils will rise earlier, they will finish earlier, and that Ysgol Cwm Brombil will seek to put in place the necessary arrangements to ensure pupils have adequate access to extra-curricular activities.

## Impacts on deprivation in the Upper Afan Valley

There were concerns raised by stakeholders about the effect of school closure on the deprivation in the community, due to the jobs that will be lost.

 NPTCBC responded that should a decision be taken to close the school, all staff with contracts attached to Cymer Afan Comprehensive School will be declared redundant, and these employees will be supported by the Council's policies, which includes full consultation, and HR staff. While it is expected that some staff will take up positions at the new school, previous experience has shown that in a school reorganisation some staff will seek work elsewhere.

Further concerns were raised around impacts of the school closure on deprivation in the community, as the closure could increase isolation of the upper Afan Valley from other parts of Neath Port Talbot.

NPTCBC responded that a Community Impact Assessment was undertaken, which
found that there are opportunities to relocate community-based activity from the
school to alternative locations, with no loss of amenity to the wider community. It was
also explained that the proposal is not intended to isolate the upper Afan Valley,
rather, it is expected to expand opportunities and experiences for children and young
people in the community.

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

NPTCBC have responded to the potential impacts raised by responses to the consultation. NPTCBC have set out where and how they will mitigate potential adverse impacts, these should be monitored and action plans set in place to ensure their delivery.

## Section 6 - Post Consultation

What was the outcome of the consultation?

The outcomes of the consultation will be reported to the Council's Education, Skills and
Culture Cabinet Board so that Members may decide on whether to progress with the
proposal. 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:
<ul> <li>NPTCBC details that monitoring will be via:</li> <li>data received from each school;</li> <li>reports from School Improvement Officer Core Visits; and</li> <li>Estyn Inspection reports.</li> </ul>
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	Х	
Outcome 2: Adjust the initiative		
Outcome 3: Justify the initiative		
Outcome 4: Stop and remove the initiative		77
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For outcome 3, detail the justification for proceeding here

# **Section 9 - Publication arrangements:**

Information on the publication arrangements for equality impact assessments is available in the guidance note