

Cardiff Council  
Equality Impact Assessment  
Corporate Template



<b>Strategy Title:</b> Cardiff Council's 21 <sup>st</sup> Century Schools Programme – Band B
New

Who is responsible for developing and implementing the Policy/Strategy/Project/Procedure/Service/Function?	
Name: Janine Nightingale	Job Title: Head of Schools Organisation, Access & Planning
Service Team: Schools Organisation Planning (SOP)	Service Area: Education
Assessment Date: October 2017	

**1. What are the objectives of the Policy/Strategy/Project/ Procedure/ Service/Function?**

Band B is the second tranche of funding from the Welsh Government to modernise education infrastructure. The Council's proposed Vision for Cardiff's Band B 21st Century School Strategy is to deliver "***Inspiring, sustainable, community-focused schools in which children and young people can achieve their potential.***"

The programme has 4 main aims as follows:

- **Aim 1:** To provide a sufficiency of school places across the city that are in the right place and are at the right size to enable the delivery of excellent education provision.
- **Aim 2:** To provide high quality educational facilities that will meet the diverse requirements of the 21st Century.
- **Aim 3:** To optimise the use of education infrastructure for the benefit of the wider community across Cardiff.
- **Aim 4:** To ensure that Cardiff achieves best value from its resources to improve the efficiency and cost effectiveness of the education estate.

**2. Please provide background information on the Policy/ Strategy / Project / Procedure / Service / Function and any research done [e.g. service users data against demographic statistics, similar EIAs done etc.]**

Since the approval of the "Band A" investment programme in 2014 there have been a number of significant factors that will influence the sufficiency of school places in Cardiff. These include:

- A sustained rapidly growing population in the City that has seen it grow by 1.1% per annum, which is around 4,000 individuals.
- This has resulted in successive large Reception age cohorts of 4,200 pupils, continuing to enter the system and significantly exceeding the intakes in the last 10

year period. The most recent reception intake represents an increase of 28% that is over 800 more children compared to the 2006 intake of 3,381 pupils.

- The large primary cohorts are now age promoting to Secondary Schools and by September 2019, they will exceed the numbers of places available within the English medium high school sector across the City at entry to year 7. Projections indicate that there will need to be an additional 8 Forms of Entry (equating to 240 places more per year) over and above the existing 114 form of entry city-wide at entry to Year 7 in the English-medium sector, in order to accommodate the existing residential population and known migration patterns. The central areas of the city have the most acute need for additional schools places and require a strategic solution to meet demand. These are concentrated in the areas that serve the catchment for Fitzalan High School, Cantonian High School, Willows High School, Cathays High School and Cardiff High School.
- As the City's population has grown so has the number of children with Additional Learning Needs. At present, 23.4% of pupils in Cardiff schools have an Additional Learning Need (ALN) and there are currently appropriately 1,800 statements of ALN across the authority. Whilst, there are a number of specialist settings across the Cardiff, the needs presenting exceed the places available and will continue to do so into the future, creating an acute sufficiency issue. Increased need is anticipated particularly within the following areas: behaviour emotional and social needs (BESN); complex learning needs (CLN); (nb: The term CLN is used here as a generic term for a range of primary need labels including severe learning difficulties (SLD), physical and medical needs (PMED), profound and multiple learning disabilities (PMLD) and autism spectrum conditions (ASC).
- The City of Cardiff has been a dispersal area for asylum seekers for more than a decade. More recently, EU nationals have arrived, along with large numbers of students from around the world who attend local universities and bring their families.
- Cardiff's adopted Local Development Plan, maps the infrastructure required to facilitate and sustain the city's growth up to 2026. This involves the potential building of 41,415 homes over the period of the plan including sizeable strategic sites in the North and West of the City. These will be of up to 5000 homes in each area, which will generate significant increases in pupil place demand and distribution across the city, continuing over the next 10 years.
- In order to increase the demand for places in the Welsh-medium primary sector, in accordance with the Welsh Government Policy aspirations and the Cardiff City Council's Welsh in Education Strategic Plan (WESP), some additional investment is necessary. Demand for Welsh-medium places at entry to secondary education is projected to exceed places available by September 2021.
- Cardiff has a very large education estate with over 127 school properties, many of which comprise multiple blocks, spread geographically across the City. A large number of these, including both primary, secondary and special schools, are in a very poor state of repair. The estate has a significant maintenance backlog of approximately £68M, of which circa £8M is Equality Act 2010 compliance. There are now three High Schools in Cardiff that are classed as "D" which is end of life and risk of imminent failure in terms of their Condition. These are Cantonian High, Willows High and Fitzalan High. The large proportion of schools classed as "C" condition, exhibiting major deterioration, in the primary, secondary & special sector. In fact, this represents 46% of the overall estate.

- Four schools in the special sector were classed as “D” for suitability. That is they were deemed to have poor environments and the buildings seriously inhibited the schools’ ability to deliver the curriculum and these are catering for some of the most vulnerable children in the city.
- In Band B, the programme would address the sufficiency of places within the English-medium secondary sector in the main but would also improve the condition of schools within the worst condition rating category.

### 3 Assess Impact on the Protected Characteristics

#### 3.1 Age

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact** [positive/negative/] on younger/older people?

	Yes	No	N/A
3 to 11 years	X		
11 to 18 years	X		
18 - 65 years	X		
Over 65 years	X		

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

What action(s) can you take to address the differential impact?

If no differential impact, explain the reason(s) for this assessment:

There would be a positive impact on 3-18 year age groups in particular, due to a new school buildings being provided for this core age group.

There would also be a positive impact on over 18 year olds too due to new schools offering community facilities that would be accessible by the wider community through:

- Modern inspiring learning facilities across the city
- Schools at the heart of the community and co-located community and/or integrated services where appropriate

There may still be a perception that recruitment/deployment opportunities could be affected by age. The Council’s procedure for managing staffing changes arising from reorganisation of school places would be used in implementing any changes. This would ensure that good practice is applied including the application of the Council’s policies on equal opportunities.

### 3.2 Disability and Access

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact** [positive/negative] on disabled people?

	Yes	No	N/A
Hearing Impairment	x		
Physical Impairment	x		
Visual Impairment	x		
Learning Disability	x		
Long-Standing Illness or Health Condition			x
Mental Health			x
Substance Misuse			x
Other			x

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

**What action(s) can you take to address the differential impact?**

**If no differential impact, explain the reason(s) for this assessment:**

Delivery of the programme would have a positive impact on accessibility for all users. A number of schools across Cardiff are not fully wheelchair accessible and therefore choice of school for pupils with disabilities is dictated by the level of adaptations. This means that many areas of Cardiff do not provide “accessible pathways” from primary to secondary school. In many cases, pupils are not able to stay with their peer group at transition and have to travel across the city to attend secondary education that can meet their needs.

It is difficult to adapt schools so that they become fully wheelchair accessible and so accessibility is only significantly improved with the provision of new build schools. Delivering new build projects in Band B would provide “accessible pathways” across the city and take into account the needs of the following:

Those with a hearing impairment – e.g. appropriate acoustics, British Sign Language images/symbols and portable/static hearing loops.

Those with a visual impairment - e.g. the use of colour to differentiate between the function of spaces, tactile maps and pictorial signs.

Those with a physical impairment – e.g. level threshold doors, lifts with disabled access

Those with learning disabilities – e.g. quiet spaces

Special Educational Needs (SEN) School Action support is provided in the classroom. However, there may be occasions where pupils are withdrawn from a classroom to receive an intervention. If the new build accommodation is a standardised design, discussion would be needed on the design approach and how it caters for pupils with SEN.

The design stage would give consideration to future proofing the accommodation in terms of accessibility. For example, space could be provided to enable accessible toilets could be modified without significant structural changes being required.

**Consultation**

Feedback from public consultation and from engagement with schools would be considered. The Design Equalities Advisory Group (DEAG) and/or the Cardiff Council Access Focus Group (CCAFG) and/or the Council's City Operations Inclusion Officer would also be given the opportunity to comment at the design stage.

### ***Transport***

Transport for pupils with a disability would not be affected as it would be provided if required to meet the child's needs in accordance with the SEN Code of Practice.

## **3.3 Gender Reassignment**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on transgender people?

	Yes	No	N/A
<b>Transgender People</b> (People who are proposing to undergo, are undergoing, or have undergone a process [or part of a process] to reassign their sex by changing physiological or other attributes of sex)		x	

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

What action(s) can you take to address the differential impact?

If no differential impact, explain the reason(s) for this assessment:

Feedback arising from consultation on a project would inform provision e.g. privacy of toilet provision, changing areas.

### ***Recruitment/redeployment opportunities***

The Council's procedure for securing staffing requirements would be used to ensure that good practice is followed, including the application of the Council's policies on equal opportunities.

## **3.4. Marriage and Civil Partnership**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on marriage and civil partnership?

	Yes	No	N/A
Marriage			x
Civil Partnership			x

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

What action(s) can you take to address the differential impact?

If no differential impact, explain the reason(s) for this assessment:

N/A

### 3.5 Pregnancy and Maternity

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact** [positive/negative] on pregnancy and maternity?

	Yes	No	N/A
Pregnancy		x	
Maternity		x	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

**What action(s) can you take to address the differential impact?**

**If no differential impact, explain the reason(s) for this assessment:**

An equality impact assessment would be carried out at the design stage on a new build scheme and to identify any reasonable adjustments that could be made to improve accessibility to any existing accommodation. The equality impact assessment would take into account policies such as the Equality Act 2010, TAN 12: Design June 2009 as well as building regulations such as, BS8300, Part M and relevant Building Bulletins

#### ***Recruitment/redeployment opportunities***

The Council's procedure for securing staffing requirements would be used to ensure that good practice is followed, including the application of the Council's policies on equal opportunities.

### 3.6 Race

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact** [positive/negative] on the following groups?

	Yes	No	N/A
White		x	
Mixed / Multiple Ethnic Groups		x	
Asian / Asian British		x	
Black / African / Caribbean / Black British		x	
Other Ethnic Groups		x	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

**What action(s) can you take to address the differential impact?**

**If no differential impact, explain the reason(s) for this assessment:**

The programme would not have a differential impact upon one particular ethnic group, as the provision would be available to all.

### 3.7 Religion, Belief or Non-Belief

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact** [positive/negative] on people with different religions, beliefs or non-beliefs?

	Yes	No	N/A
Buddhist		x	
Christian		x	
Hindu		x	
Humanist		x	
Jewish		x	
Muslim		x	
Sikh		x	
Other		x	

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

What action(s) can you take to address the differential impact?

If no differential impact, explain the reason(s) for this assessment:

The Council provides education for access by all children and young people and therefore does not itself establish faith schools. The senior management in a school are best placed to manage needs e.g. providing space for prayer and any significant change in diversity in terms of belief. New accommodation would be designed to incorporate the EAL facilities required by Building Bulletins 98/99/102.

### 3.8 Sex

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact** [positive/negative] on men and/or women?

	Yes	No	N/A
Men		x	
Women		x	

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

What action(s) can you take to address the differential impact?

If no differential impact, explain the reason(s) for this assessment:

**Recruitment/redeployment opportunities**

The Council's procedure for securing staffing requirements would be used to ensure that good practice is followed, including the application of the Council's policies on equal opportunities.

### 3.9 Sexual Orientation

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact** [positive/negative] on the following groups?

	Yes	No	N/A
Bisexual		x	
Gay Men		x	
Gay Women		x	
Heterosexual		x	

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

What action(s) can you take to address the differential impact?

If no differential impact, explain the reason(s) for this assessment:

#### ***Recruitment/redeployment opportunities***

Evidence collated by the Stonewall lobby group alleges that Lesbian, Gay, Bisexual people are likely to be discriminated against in workplace recruitment. The Council's procedure for securing staffing requirements would be used to ensure that good practice is followed, including the application of the Council's policies on equal opportunities.

### 3.10 Language

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact** [positive/negative] on Welsh Language?

	Yes	No	N/A
Welsh Language		x	
Other languages		x	

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

What action(s) can you take to address the differential impact?

If no differential impact, explain the reason(s) for this assessment:

Proposals are brought forward to meet demand for English-medium or Welsh-medium education.

It is Cardiff Council's policy to provide signage in English and Welsh but not in other spoken languages. Therefore, additional way-finding methods would be considered including the use of colour to differentiate between the function of spaces, tactile maps, Braille language on signs and British Sign Language images/symbols.



#### **4. Consultation and Engagement**

What arrangements have been made to consult/engage with the various Equalities Groups?

The Design Equalities Advisory Group (DEAG) and/or the Cardiff Council Access Focus Group (CCAFG) are given the opportunity to comment on projects at the design stage. The internal equalities groups could also be consulted for comments, if appropriate.

#### **5. Summary of Actions [Listed in the Sections above]**

<b>Groups</b>	<b>Actions</b>
Age	Equality Impact Assessments are carried out on each proposal and project. An initial equality impact assessment is carried out at the proposal stage and is updated following consultation. A further equality impact assessment is then carried out at the design stage on a new build scheme and to identify any reasonable adjustments that could be made to improve accessibility to any existing accommodation.
Disability	
Gender Reassignment	
Marriage & Civil Partnership	
Pregnancy & Maternity	
Race	
Religion/Belief	
Sex	
Sexual Orientation	
Language	The equality impact assessments would take into account policies such as the Equality Act 2010, TAN 12: Design June 2009 as well as building regulations such as, BS8300, Part M and relevant Building Bulletins.

#### **6. Further Action**

Any recommendations for action that you plan to take as a result of this Equality Impact Assessment (listed in Summary of Actions) should be included as part of your Service Area's Business Plan to be monitored on a regular basis.

#### **7. Authorisation**

The Template should be completed by the Lead Officer of the identified Policy/Strategy/Project/Function and approved by the appropriate Manager in each Service Area.

Completed By: Angela Withey	Date: October 2017
Designation: Project Manager – Governance	
Approved By: Janine Nightingale	
Designation: Head of Schools Organisation, Access & Planning	
Service Area: Education	