

**Equality Impact Assessment  
Corporate Assessment Template**



Appendix 9

<b>Policy/Strategy/Project/Procedure/Service/Function Title: School Organisation Planning: Provision for children and young people with Additional Learning Needs (ALN)</b>
<b>New/Existing/Updating/Amending: Post consultation</b>

<b>Who is responsible for developing and implementing the Policy/Strategy/Project/Procedure/Service/Function?</b>	
Name: Richard Portas	Job Title: Programme Director
Service Team: Schools Programme	Service Area: Education
Assessment Date: February 2022	

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

<p>1. To inform Cabinet of the responses received following public consultation held from 11 October 2021 to 17 January 2022 on the following proposal regarding the expansion and transfer of The Court Special School:</p> <ul style="list-style-type: none"> <li>• increase the capacity of The Court Special School from 42 to 72 places. The school would transfer to new build accommodation across two sites at Fairwater Primary School and the current St Mellons, CiW Primary School site in Llanrumney with 36 pupils on each site from September 2025.</li> </ul> <p>2. To inform Cabinet of the responses received following public consultation held from 14 December 2021 – 01 February 2022 on the following proposals regarding the expansion of additional learning needs provision:</p> <ul style="list-style-type: none"> <li>• increase the capacity of Greenhill School from 64 to 160 places. The school would transfer to new build accommodation across two sites at the Ty Glas in Llanishen and the Dutch Garden Centre site with 80 places on each site from September 2025</li> <li>• establish a 20-place Specialist Resource Base for emotional health and wellbeing at Cardiff West Community High School from September 2022</li> <li>• establish a 20-place Specialist Resource Base for emotional health and wellbeing at Eastern High from September 2022.</li> </ul>
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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.]

Officers consulted with a range of stakeholders including pupils, local residents, local schools, Councillors, local community groups and residents on the proposal as set out at section 1.

The consultation process involved:

- publication of bilingual consultation documents outlining background, rationale and implications to parents, Headteachers and Chairs of Governors, all Members of local wards, local residents and other stakeholders (a copy of the consultation documents can be seen at Appendix 1);
- publication of bilingual summary documents setting out the main points of the consultation documents (a copy of the summary documents can be seen at Appendix 2);
- publication of information in community languages upon request;
- Consultation meetings via Microsoft Teams with Governors and staff at The Court Special School, Greenhill School and Cardiff West Community High School. Eastern High declined the opportunity to meet (notes from the meetings can be seen at Appendix 3);
- consultation meetings via Microsoft Teams/in person with pupil representatives at The Court Special School, Greenhill School, Cardiff West Community High School and Eastern High (notes from these meetings can be seen at Appendix 4);
- the pupil consultations that took place in person were conducted in line with the relevant Health and Safety guidance.
- public consultation meetings via Microsoft Teams at which the proposal was explained and questions answered (notes from the meetings can be seen at Appendix 5);
- drop-in sessions were offered via Microsoft Teams where officers were available to answer questions (there were no requests for drop-in sessions);
- letters setting out details of the proposals and where further information could be found were sent to local residents and businesses in the area surrounding the school sites subject to the proposed changes;
- a communication campaign via social media;
- a consultation response slip for return by post or e-mail, attached to the consultation documents and summary documents;

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- an online response from at [www.cardiff.gov.uk/ALNSchoolproposals](http://www.cardiff.gov.uk/ALNSchoolproposals)

For stakeholders who did not have access to digital platforms the opportunity to discuss the proposed changes via telephone was available.

The views expressed at Council organised meetings, drop-in sessions, telephone calls, and on paper or electronically through the appropriate channels, have been recorded. Responses received were regarding the proposal during the consultation period.

Views were sought from interested stakeholders via an online survey and a hard copy version of the survey within the consultation document.

The details presented in the report, represent the views expressed during the consultation process. These include the wider stakeholder survey, formal responses, e-mail responses, views expressed at public meetings, drop-in sessions, telephone calls and pupil consultation meetings.

The views expressed in the wider stakeholder surveys reflect those raised in the e-mail responses received.

**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
Up 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.**

The impact will be positive as the proposals will support the sufficiency of places in suitable specialist learning environments.

This provision is age dependent and therefore not accessible to pupils outside of this age range, or adults, either locally or in the wider community.

The Council would manage admissions to special school and specialist resource base provision in accordance with the ALN Code.

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

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If the proposals were to proceed, an equality impact assessment would be carried out to identify the accessibility of any new accommodation. The equality impact assessment would take into account policies such as the Equality Act 2010, TAN 12: Design 2014 as well as building regulations such as, BS8300, Part M and relevant Building Bulletins.

The Council's procedure for managing staffing changes arising from the proposal would be used in implementing any changes as a result of this proposal. This would ensure that good practice is followed, including the application of the Council's policies on equal opportunities.

### 3.2 Disability

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

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

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

The impact will be positive as the proposals will support the sufficiency of places in suitable specialist learning environments.

The Council would manage admissions to special school and specialist resource base provision in accordance with the ALN Code.

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

If the proposals were to proceed, an equality impact assessment would be carried out to identify the accessibility of any new accommodation new school building. The equality impact assessment would take into account policies such as the Equality Act 2010, TAN 12: Design 2014 as well as building regulations such as, BS8300, Part M and relevant Building Bulletins.

The Council's procedure for managing staffing changes arising from the

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proposal would be used in implementing any changes as a result of this proposal. This would ensure that good practice is followed, including the application of the Council's policies on equal opportunities.

**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.**

The proposed changes would not have a differential impact as the schools and specialist resources bases will continue to apply the Council's policies on equal opportunities.

The Council would manage admissions to special school and specialist resource base provision in accordance with the ALN Code.

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

The Council's procedure for managing staffing changes arising from reorganisation would be used in implementing any changes as a result of this proposal. This would 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.**

The proposed changes would not have a differential impact as the schools and specialist resource bases will continue to apply the Council's policies on equal opportunities.

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

The Council's procedure for managing staffing changes arising from reorganisation would be used in implementing any changes as a result of this proposal. This would ensure that good practice is followed, including the application of the Council's policies on equal opportunities.

**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.**

The proposed changes would not have a differential impact as the schools and specialists resource bases will continue to apply the Council's policies on equal opportunities.

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

The Council's procedure for managing staffing changes arising from reorganisation would be used in implementing any changes as a result of this proposal. This would 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.**

The proposed changes would not have a differential impact as the schools and specialist resource bases will continue to apply the Council's policies on equal opportunities.

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The Council would manage admissions to special school and specialist resource base provision in accordance with the ALN Code.

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

The Council's procedure for managing staffing changes arising from reorganisation would be used in implementing any changes as a result of this proposal. This would ensure that good practice is followed, including the application of the Council's policies on equal opportunities.

**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.**

The proposed changes would not have a differential impact as the schools and specialist resource bases will continue to apply the Council's policies on equal opportunities.

The Council would manage admissions to special school and specialist resource base provision in accordance with the ALN Code.

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

The senior staff in a school would be best placed to manage diversity in terms of belief. (e.g. provision of a space for prayer).

**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	

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

The proposed changes would not have a differential impact as the schools and special resources bases will continue to apply the Council's policies on equal opportunities.

The Council would manage admissions to special school and specialist resource base provision in accordance with the ALN Code.

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

Maintained school provision admits pupils of both sexes and this would continue to be the case.

The Council's procedure for managing staffing changes arising from reorganisation would be used in implementing any changes as a result of this proposal. This would 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/Lesbians		X	
Heterosexual/Straight		X	

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

The proposed changes would not have a differential impact as the schools and special resource bases will continue to apply the Council's policies on equal opportunities.

The Council would manage admissions to special school and specialist resource base provision in accordance with the ALN Code.

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

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 managing staffing changes arising from



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reorganisation would be used in implementing any changes as a result of this proposal. This would ensure that good practice is followed, including the application of the Council's policies on equal opportunities.

#### 3.10 Socio-economic Duty

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on the Socio-economic Duty?

	Yes	No	N/A

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

The proposed changes are expected to have a positive impact on the Socio-economic Duty. The Council's has made a clear commitment to continuing the investment in, and improvement of, Cardiff schools to make sure every child has the best possible start in life ([www.cardiffcommitment.co.uk](http://www.cardiffcommitment.co.uk)).

The delivery of 21st Century Learning environments will ensure that there are appropriate, high quality school places for young people, which meet the needs of Cardiff's growing and changing population.

The Council works closely with the governing bodies of schools to ensure that standards in schools are high, that teaching is good, and that leadership and governance is strong.

The Council does not expect the proposal to have any negative impact on the quality of standards of education for pupils, at these schools.

Some of the funding that a school receives is based on the number of pupils in the school who receive Free School Meals. All schools in Cardiff would receive funding for these pupils. There is no information available that suggests that the proposals would have a negative effect on pupils who receive Free School Meals.

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

N/A

#### 3.11 Welsh Language

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

	Yes	No	N/A

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

The level of special educational needs/ additional learning needs in the Welsh medium sector has historically been lower than in the English medium sector. This has been changing over the last 4-5 years, with schools reporting an increased incidence of ALN, in all areas of need.

A review of ALN in the Welsh medium sector was undertaken with Welsh medium schools in 2016 to inform the Welsh in Education Strategic Plan (WESP). Schools reported a small but significant number of examples of pupils with ALN leaving the Welsh medium sector in order to access specialist resource bases or special schools.

There was also some anecdotal evidence to suggest that some families who would otherwise choose Welsh medium education, opt instead for English medium if their child has ALN, in case their child needs to transfer to the specialist sector at a later date.

Through the WESP, Cardiff has invested in specialist provision in the sector, including some capacity to respond to growing demand and to generate more confidence in the availability of specialist provision in the sector.

A new primary base was established at Ysgol Pwll Coch; a 'feeder' school for Ysgol Glantaf, where the secondary base is established. The two bases cater for learners with severe learning difficulties, providing a specialist curriculum and supporting a range of secondary needs including physical and medical needs, speech and language difficulties and autism.

In 2021 there is growing demand for resource bases for pupils with autism, who are average to high achievers, and would need a more integrative model of support than that provided by the two existing bases. There are currently 8 secondary aged learners, and 15 primary aged learners who would benefit from placement in an ASD base. This is a short term priority, given the risk that if current placements fail, the only option would be to offer a transfer to an English medium setting.

A primary wellbeing class has been established, hosted at Ysgol Pen y Groes. The wellbeing class works flexibly to address needs in different age phases, or to provide an outreach model, depending on current need.

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To support emotional health and wellbeing needs in secondary phase, a 'virtual' base/ PRU has been piloted across the three secondary schools, starting in 2018. The pilot is due for further review in 2021.

The priority is to ensure the three schools have adequate facilities and accommodation to provide effective Step 3 and 4 proviso, complemented by the virtual base/ PRU. Medium term, the virtual base/ PRU will eventually need a fixed location at one of the schools, with designated accommodation, to reduce the risk that young people with the most complex needs may need to leave the Welsh sector to access more specialist provision.

As the Welsh sector continues to grow it will be important to develop additional provision in anticipation of the need, to ensure Welsh medium education is a genuine choice for learners with complex ALN.

The pool of ALN qualified and experienced teaching staff is limited in comparison to the English sector. Any plan to develop Welsh medium specialist provision will need to be supported by an ALN Workforce Development Plan.

In accordance with the timetable set by Welsh Government, the Council is working closely with its partners on the Cardiff Welsh Education Forum to develop the new ten-year WESP for the city. It is expected the plan will be available for public consultation in autumn 2021 before being submitted for approval to the Welsh Government in early 2022. The first ten-year Plan will commence on 1 September 2022 and expire on 31 August 2032.

Consultation on the draft WESP will seek views on how best to grow Welsh-medium education and on how to meet the local targets set by Welsh Government, in order to inform future proposals. The WESP will set out how the Council will increase the provision of Welsh-medium education for pupils with additional learning needs.

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

Demand for WM ALN places will be kept under review and proposals brought forward in line with the Welsh in Education Strategic Plan

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

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

The Council's Accessibility Officer would be given the opportunity to comment on the schemes.

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

<b>Groups</b>	<b>Actions</b>
Age	See Generic Over Arching below
Disability	
Gender Reassignment	
Marriage & Civil Partnership	
Pregnancy & Maternity	
Race	
Religion/Belief	
Sex	
Sexual Orientation	
Socio-economic Duty	
Welsh Language	
Generic Over-Arching [applicable to all the above groups]	

**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 : Rosalie Phillips	Date: February 2022
Designation: School Organisation Project Officer	

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Approved By:	
Designation:	
Service Area: Education	

- 7.1 On completion of this Assessment, please ensure that the Form is posted on your Directorate's Page on CIS - *Council Wide/Management Systems/Equality Impact Assessments* - so that there is a record of all assessments undertaken in the Council.

For further information or assistance, please contact the Citizen Focus Team on 029 2087 2536 / 3262 or email [equalityteam@cardiff.gov.uk](mailto:equalityteam@cardiff.gov.uk)