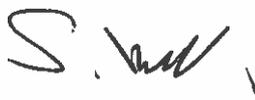


# Equality Impact Assessment Template

Please complete this template using the [Equality Impact Assessment Guidance document](#)

**Version 3: January 2013**

Title of proposal (include forward plan reference if available)	<b>The Westminster School – proposal to increase capacity by expansion (SMBCXX tbc)</b>
Directorate and Service Area	Education, Skills and Employment Directorate, Education Support Services
Name and title of Lead Officer completing this EIA	Paul Hayward, Team Manager – School Organisation and Development
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Names and titles of other officers involved in completing this EIA	Sue Moore Group Head Education Support Services
Partners involved with the EIA where jointly completed	
Date EIA completed	07 August 2018
Date EIA signed off or agreed by Director or Executive Director	
Name of Director or Executive Director signing off EIA	
Date EIA considered by Cabinet Member	

**See Equality Impact Assessment Guidance for key prompts that must be addressed for all questions**

- 1. The purpose of the proposal or decision required (Please provide as much information as possible)**

To consider the outcome of a statutory consultation exercise following the publication of a proposal to expand the capacity of The Westminster School to 250 places. It is proposed that this is achieved by expanding into the adjoining educational building currently occupied by Whiteheath Education Centre (Alternative Provision).

The proposal in full: that, having taken the results of consultation into account and notwithstanding any appeal from the local Church of England diocese, the Roman Catholic diocese or the school governing body, approval be given to the prescribed alterations at The Westminster School, Rowley Campus, Curral Road, Rowley Regis, B65 9AN subject to the allocation of capital funding to support the reorganisation of The Westminster School and associated move of Whiteheath Education Centre.

The proposal, if agreed, will lead to more young people with disabilities in Sandwell being able to attend a special school catering for Moderate Learning Difficulties (MLD). This requirement was identified by an independent review carried out on behalf of the Head Teachers' Joint Executive Group and the Local Authority. The expansion will increase the council's ability to provide places on the Supported Internship and Apprenticeships leading to increased employment opportunities for young people with Learning Disabilities

## **2. Evidence used/considered**

Having undertaken an independent review (EVOLVE Review 2015-2016) of Special Educational Need (SEN) provision in Sandwell, the council and the Joint Executive Headteacher Group (JEG) has identified the need to increase SEN provision by using the full capacities of our schools, including special schools. Consideration has been given to what additional provision is required and what can be better utilised within our existing schools.

In accordance with the DfE strategy "Preparing for Adulthood", Young people in Sandwell with SEND have requested that the Supported Internships and Apprenticeships programmes, based at The Westminster School, be expanded so that more young people with special needs can access pathways to employment.

## **3. Consultation**

An initial consultation process began in January 2018 but was cancelled so that the consultation document could be further developed to provide more detail about options and implications for the proposed relocation of Whiteheath Education Centre.

The consultation process recommenced on 11th May 2018 and ran for five weeks until 15th June. The consultation, though focussing on the statutory requirement linked to the prescribed alterations at The Westminster School, included very detailed information about Whiteheath. The following stakeholders were consulted:

The Governing Body of The Westminster School, parents of children at the school, members of staff, Whiteheath Education Centre, all Sandwell schools, local ward councillors, the local authorities of Birmingham, Wolverhampton, Dudley and Walsall, Church of England and Roman Catholic diocesan authorities, members of the community including Special Educational Needs and Disabilities Information Advice and

Support Service (SENDIASS), Local businesses, Autism West Midlands, Joint Union Panel.

The consultation elicited a positive response with a very large majority supporting the proposal (642 supported the proposal; 12 objected).

Of those supporting the proposal, comments from parents, staff, governors, students, and community members were received and these generally covered the following:

- Improved opportunities for SEN students in learning and employment opportunities;
- Excellent teachers and leadership already at the school;
- Numbers should increase in line with the growing population and Sandwell needs more provision of this standard;
- Westminster already offer wonderful opportunities to post 16 students through work experience and internships and the expansion will support more students;
- Many supportive comments from pupils referencing improved chances of getting a job;
- Reference to the outstanding OfSTED judgement at Westminster meaning the school is well placed to take forward the national agenda for improving employment chances for children with SEND;
- By expanding, more young people will have access to a purpose-built curriculum;
- This supports students, their families and the extended community.

In accordance with prescribed regulations the council then proceeded with the proposal to the statutory stage of consultation. This involved the publication of a formal proposal and a statutory notice on 25 June 2018. The representation period lasted 4 weeks during which time any objections or observations could be made to the council. At the expiry of the representation period on 23 July 2018, 17 letters of objection were received from parents of students attending Whiteheath Education Centre. All letters shared a common concern –that the Whiteheath Education Centre in its current building had supported pupils across a number of year groups and such pupils had been reassured and supported by a building that was purpose built, quiet, open and different to a mainstream school. The preferred option of the South Tipton campus for the relocation was perceived by these parents to be darker, smaller and potentially disruptive as a result of being overlooked by a day nursery and secondary school.

#### **4. Assess likely impact**

Please give an outline of the overall impact if possible.

Although there has been some objection to the proposal from the Chair of the Management Committee of Whiteheath Education Centre and parents of students attending Whiteheath, the LA believes that the alternative accommodation at the Sandwell Community School – South Tipton campus site, is a suitable alternative site with qualities that mitigates these concerns.

The Authority considers that this site provides a location for the Centre that has suitable and sufficient accommodation to a similar standard to the Rowley Campus. The unit also forms part of the BSF contract arrangements, which for the Centre, provides a

[ILO: UNCLASSIFIED]

similar facilities management and ICT service as purchased at the Rowley Campus. To mirror the current contractual arrangements as the Rowley Campus this would provide the minimal disruption for the Centre whilst staff can focus on settling pupils in their new setting.

Through the Authority's EVOLVE programme financial support will be identified for any minor re-decoration works, re-location costs, and any BSF fees incurred as a result of the required contract variations.

Operational costs associated with the South Tipton campus are projected to be lower than Whiteheath Education Centre currently pays at Rowley Campus. So these savings can be re-directed for the benefit of the young people on site i.e., more therapeutic support.

South Tipton campus has capacity for up to 50 young people, and a number of facilities that include:

- Science facilities (laboratory for a small group 6-8 students).
- Art facilities (art room for a small group 6-8 students).
- Food technology facilities (food technology room for a small group 6-8 students).
- Outdoor area with trees and flower beds adjacent to a nursery school.
- A small number of private counselling and consulting rooms for therapeutic work with students. The unit is spacious, quiet and modern and gives a more "mainstream" appearance than current facilities which will assist with re-integration.

Also, the move to the South Tipton campus would save Whiteheath Education Centre an estimated £27,000 on site running costs which could be spent on enhanced provision for young people and allow for expanded services. The Authority would allocate capital resources to support the re-location of Whiteheath.

As a result, there is likely to be no adverse impact on people or groups with protected characteristics.

**Please complete the table below at 4a to identify the likely impact on specific protected characteristics**

**4a. Use the table to show:**

- Where you think that the strategy, project or policy could have a negative impact on any of the equality strands (protected characteristics), that is it could disadvantage them or if there is no impact, please note the evidence and/or reasons for this.
- Where you think that the strategy, project or policy could have a positive impact on any of the groups or contribute to promoting equality, equal opportunities or improving relationships within equality characteristics.

<b>Protected Characteristic</b>	<b>Positive Impact</b>	<b>Negative Impact</b>	<b>No Impact</b>	<b>Reason and evidence (Provide details of specific groups affected even for no impact and where negative impact has been identified what mitigating actions can we take?)</b>
Age	✓	✓	✓	The proposed increase in capacity at The Westminster School will: a) Confirm current provision for 7 to 16 year olds; and b) Create space for a bespoke 16 to 19 provision that will enable students to extend their studies and access Supported Internships and Supported Apprenticeships
Disability	✓			The proposal, if agreed, will lead to more young people with disabilities in Sandwell being able to attend a special school catering for Moderate Learning Difficulties (MLD). The expansion will increase the council's ability to provide places on the Supported Internship and Apprenticeships leading to increased employment opportunities for young people with Learning Disabilities
Gender reassignment			✓	

Marriage and civil partnership				✓	
Pregnancy and maternity				✓	
Race				✓	
Religion or belief				✓	
Sex				✓	
Sexual orientation				✓	
Other					

Does this EIA require a full impact assessment? Yes  No

If there are no adverse impacts or any issues of concern or you can adequately explain or justify them, then you do not need to go any further. You have completed the screening stage. You must, however, complete sections 7 and 9 and publish the EIA as it stands.

If you have answered yes to the above, please complete the questions below referring to the guidance document.

## 5. What actions can be taken to mitigate any adverse impacts?

To mitigate concerns relating to the relocation of Whiteheath to the South Tipton campus the following can be confirmed:

- The unit at Tipton was delivered as part of the Authority's Building Schools for the Future (BSF) programme. The BSF work was completed in December 2011 as Phase 3 of Sandwell's BSF programme.
- The works consisted of major refurbishment, remodelling to the former Community Block (built 1991) and Science Block (built 1997) and a minor new build extension.
- The outcome, and basis upon which the final Central Government approval was given, was to ensure all new facilities provided a 21<sup>st</sup> century modern teaching and learning environment.
- The previous user of this BSF facility, i.e. Sandwell Community School, was required to enter into a facilities management contract to maintain the standard of accommodation as delivered through the BSF programme.
- The management committee of Sandwell Community School has continued to maintain an annual facilities management contract for the Tipton site, which included lifecycle replacement to ensure the building is maintained to a high standard.
- The total floor area is 850 square metres.
- There are at least 8 spaces that are or could be used for teaching, in addition – a dining room and a large open plan learning area.

Apart from the physical building we will also consider the needs of the young people attending. In short, we need to deliver a suitable therapeutic environment which meets the needs of young people with psychological difficulties affecting their ability to attend school.

In order to deliver this, the therapeutic environment needs to be relatively quiet and have specialist learning spaces (e.g. science, art, cookery, music). All of these requirements are included at the new site. Given that the building was originally designed to meet the needs of school age young mothers there are a number of rooms that can easily revert back to providing a therapeutic space for individual and group counselling / self-esteem work etc.

The site includes a garden area that would provide a perfect location for the young people to engage in looking after this area (as part of therapeutic recovery) and/or to relax and take time out of the building in order to support their psychological needs. The garden backs onto a small nursery play area. For some young people, going on to study childcare, the nursery provides a totally non-threatening point of access to work experience.

The entrance is quickly accessed via the main car park and the youngsters will be able to quickly transfer from their transport to inside the building. The entrance to the secondary school, Q3 Academy Tipton, is completely separate and the site is separated

by a fence. Access to the unit does not pose any threat and the transfer from transport or on foot, is safe and allows a calm entry to the building.

Overall, from a psychological perspective, the layout of the building supports the wellbeing of young people. The secondary school provides opportunities for the young people to begin the process of reintegration and experience aspects of mainstream school life.

## **6. As a result of the EIA what decision or actions are being proposed in relation to the original proposals?**

To help with the transition between sites, and subject to a further Cabinet report in October, we will set aside a sum of capital funding to undertake minor refurbishment to adapt the unit to meet the needs of Whiteheath. The new head teacher of Whiteheath has already met with the Director of Education and is keen to get the best possible environment for the children. Should the Cabinet report to expand The Westminster School be approved, the school organisation team will be working with the head teacher and the management committee in the Autumn Term to ensure the building is a pleasant working environment for staff and pupils alike prior to any proposed move.

## **7. Monitoring arrangements**

- 1) Pupil support – the LA’s Educational Psychologist’s will provide pupil support to manage their transition to their new educational settings. Post implementation of the expansion proposals, the Head Teacher / Head of Centre will be able to continue to assess pupil behaviour and engage the LA’s Inclusion Support Services for any additional assistance required.
- 2) Capital works – the School Organisation and Development team will work with the Building Schools for the Future team to manage the capital works programme with The Westminster School and Whiteheath Education Centre.
- 3) Capital monitoring – subject to Cabinet approval to the proposed expansion of The Westminster School, and any future allocation of SEND capital grant funding to support the expansion, capital expenditure will be monitored through the Schools Capital Programme, and reported to the Cabinet Member for Strategic Resources on a quarterly basis.

## **8. Action planning**

See below

Action Plan Template

Question no. (ref)	Action required	Lead officer/ person responsible	Target date	Progress
7	Pupil support to manage transition to the new educational settings. Post implementation of the expansion proposals, pupil progress / behaviour to be assessed - LA's Inclusion Support Services to be engaged for any additional assistance required.	Educational Psychologist / Head Teacher and Head of Centre	January 2019	
6	The council's school organisation team to work with the head teacher and the management committee of Whiteheath to ensure the building is a pleasant working environment for staff and pupils alike.	School Organisation Team and Head Teacher	Autumn Term 2018	

## 9. Publish the EIA

### **Where can I get additional information, advice and guidance?**

In the first instance, please consult the accompanying guide “Equality Impact Assessment Guidance”

#### **Practical advice, guidance and support**

Help and advice on undertaking an EIA, using the electronic EIA toolkit or receiving training related to equalities legislation and EIAs is available to **all managers** across the council from officers within Improvement and Efficiency. The officers within in Improvement and Efficiency will also provide overview quality assurance checks on completed EIA documents.

**Please contact:**

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