



## Appendix 2 - Equality Impact Analysis Initial Screening Tool

### Section 1.0: Background Information

Name of Completing Officer:	Ikwi Mkparu
Date of Initial Screening:	22.03.21
Date of review:	19.07.21
Service Area & Directorate:	Pupil Services and School Sufficiency
Head of Service:	Terry Bryan

### Section 2.0: Summary of policy, proposal or activity being screened

<b>Name of policy, proposal or activity:</b>
<p>The London Borough of Tower Hamlets, in partnership with the governors of Harry Roberts Nursery and Ben Jonson Primary Schools, are proposing to merge the two schools to form a three form entry 3-11 primary school, with 60 FTE Nursery equivalent, and a Primary Age Social, Emotional and Mental Health (SEMH) provision. This will create a single primary school, with a nursery and a special educational needs resource base, from the start of the Spring Term in 2022.</p> <p>Harry Roberts School Governing Body was prompted by the partnership between the schools to approach Ben Jonson to consider amalgamation, in order to maintain the top-quality nursery provision at Harry Roberts, in the face of falling roles and significantly reduced funding. Both Governing Bodies reached the conclusion that to amalgamate their two schools is the best solution to optimising early years and 3-11 educational provision in the area.</p> <p>This Equalities Impact Assessment concerns the proposal to amalgamate Harry Roberts Nursery and Ben Jonson Primary Schools. It is proposed that the amalgamated school will open on 1 January 2022, catering for pupils from ages 3 to 11. The process to achieve this involves the 'technical closure' of Harry Roberts School on 31st December 2021 and the expansion of Ben Jonson School, to include nursery provision. It should be noted there will be no actual closure of school buildings.</p>
<b>What are the aims / objectives of the policy, proposal or activity?</b>
<p>The proposal is being put forward as part of the strategy for these two schools to move towards integrated 3 to 11 primary school provision, rather than maintain separate Nursery and Primary Schools. This is beneficial to children's education because it will optimise the expertise of the staff across the nursery and primary age range. Bringing the two schools together will provide the benefit of outstanding nursery practice underpinning top quality primary education, in a single education experience.</p> <p>Tower Hamlets has a great tradition of excellent education and values the important role that schools have in increasing the life chances of our children. The proposed amalgamation forms part of a wider review of primary school places across the borough, initiated to enhance the sustainability of schools and their ability to maintain high standards in the face of significant demographic changes in the west and east of the borough.</p> <p>From 8<sup>th</sup> February to 19<sup>th</sup> March, Ben Jonson Primary and Harry Roberts Nursery Schools, consulted their pupils, parents, staff and local communities, on the proposal to amalgamate the schools. Feedback from the consultation suggests that majority of the consultee were in support of the amalgamation, though the Nursery school staff, and Nursery parents, are saddened by the impact of reduced funding and numbers on levels of staffing at the Nursery School.</p> <p>A further four week statutory consultation was undertaken from 14<sup>th</sup> June to 12<sup>th</sup> July 2021, giving the general public and other stakeholders, the opportunity to comment or make objections on the proposal to amalgamate</p>



the schools. Five representatives were received in response to the statutory consultation. four where in support of the amalgamation, however one raised concerns for need for bilingual translation at parent meetings, to ensure that parents for whom English is not their first language, are able to contribute to the consultation and to make informed decisions.

The Local Authority has responded stating that It has been difficult to organise meetings during the pandemic, but a number of Bengali parents have contributed to the consultation and to the many informal discussions over the last year where bilingual staff were available, but translation was not requested.

The two schools are planning briefings for parents (including bilingual) for September 2021 so that new parents can also be informed, and all parents are updated on the process/progress of the proposed amalgamation.

If an amalgamation is decided, the running of the school would be overseen by a single headteacher and governing body. The primary school would bring both schools together to become one community.

The proposed amalgamation would build on and strengthen the joint working already taking place across the two schools, to:

- Provide continued access for pupils and their families to extended services and facilities.
- Develop more opportunities for the staff, such as shared training and the chance to work more closely across the curriculum and gain experience and understanding of all key stages
- Strengthen and continue developing community links which already exist.
- Ensure opportunities to enhance the educational offer, and access to resources for all our pupils embedding top quality early years provision at the heart of children's educational experience
- Develop greater financial stability to make certain we continue to improve and offer world class education.
- Increase capacity to offer a quality integrated SEMH provision for those pupils across Tower Hamlets who have additional SEND needs.



### Section 3.0: Equality Impact Analysis Test:

<p>Is there a risk that the policy, proposal or activity being screened disproportionately adversely impacts (directly or indirectly) on any of the groups of people listed below? This should include people of different:</p>	<p>Yes ✓</p>	<p>No ✓</p>	<p>Comments:</p>																														
<p><b>Age</b></p>		<p>✓</p>	<p><u>Pupils:</u></p> <p>Under the proposed amalgamation, all children will remain at their current school site as both schools share one site. There will be minimal / no disruption to all children aged 3 – 11 years. No one year group will be adversely affected than others. There will not be any impact on the current year 6 children as they would have transitioned to secondary school by the proposed date of amalgamation.</p> <p>As the table below shows, pupil numbers are distributed evenly across all year groups and across the schools, with a dip noted in year 1. As the feeder school to Ben Jonson Primary School, it can be assumed that majority of the current Harry Roberts Nursery pupils would have transitioned to Ben Jonson Primary School, by the proposed amalgamation date.</p> <table border="1" data-bbox="560 1021 2009 1209"> <thead> <tr> <th>Year Group</th> <th>N1</th> <th>N2</th> <th>R</th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> </tr> </thead> <tbody> <tr> <td>Harry Roberts Nursery School</td> <td>81</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Ben Jonson Primary School</td> <td></td> <td></td> <td>87</td> <td>70</td> <td>86</td> <td>84</td> <td>81</td> <td>79</td> <td>89</td> </tr> </tbody> </table> <p>The proposed amalgamation would further ensure a smooth transition From Nursery to Reception whilst maintaining a very high educational standard.</p> <p>The schools are not directly comparable with regards to educational outcomes due to one being a Nursery and the other a Primary School, however, an Ofsted inspection in November 2018 determined that Harry Roberts Nursery School was rated as</p>	Year Group	N1	N2	R	1	2	3	4	5	6	Harry Roberts Nursery School	81									Ben Jonson Primary School			87	70	86	84	81	79	89
Year Group	N1	N2	R	1	2	3	4	5	6																								
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“**Outstanding**” whilst Ben Jonson School continued to be rated as “**Good**”, maintaining this status since 2012.

Harry Roberts Nursery School: <https://reports.ofsted.gov.uk/provider/20/100888>

Ben Jonson Primary School: <https://reports.ofsted.gov.uk/provider/21/100890>

The differing needs of each age group will continue to be met. The care and importance given to each individual child, which is a strength of both schools, will always remain paramount.

Maintaining great quality early years education will be a core value for the newly established school.

Staff:

The table below shows a similar split in age ranges for each school:

Harry Roberts Nursery School	Staff age range	Total
	25 - 34	1
	35 - 44	4
	45 - 54	6
	55 - 64	6
	65 - 74	1
Ben Jonson Primary School	25 - 34	46
	35 - 44	55
	45 - 54	17
	55 - 64	8

The impact on staff, who will join together to form one staffing structure, is expected to be minimal given all staff employed at Harry Roberts Nursery and Ben Jonson Primary Schools (at the time of the proposed amalgamation) would automatically continue their employment in the new primary school and their rights would be preserved under TUPE. No redundancies are expected to occur under the proposal and where there are duplicates of posts, creative solutions will be sought to retain staff. Because of this, no particular age group will be disadvantaged over another.

Should the merger be approved in the Council’s Cabinet, there will be a full formal HR consultation, following processes agreed with the trade unions, to maximise staff strengths and build on their expertise and good will. In addition, staff across the



			<p>schools would benefit from continuity of staff policies and procedures, and the same dates for staff training days and school holidays.</p> <p>Through their review of the leadership structure in both schools, the Governing Bodies from Harry Roberts and Ben Jonson Schools agreed that the headteacher post for the new Primary School would not, in effect, be vacant and therefore not subject to advertising or selection requirements. They however recognized that embedding a role for the Head of Early Years, as part of the Ben Jonson leadership team would ring fence the pay and comparative seniority of the Head of the Nursery School</p>																								
<b>Sex</b>		✓	<p><u>Pupils:</u></p> <p>The breakdown of boys versus girls is very evenly spread within both schools although the Primary school roll is slightly weighted more towards boys than girls. Irrespective of gender, all pupils will benefit from the increased long-term educational and financial sustainability that the proposed amalgamation would bring; therefore, no adverse impact is identified regarding this protected characteristic.</p> <table border="1" data-bbox="560 758 1299 893"> <thead> <tr> <th></th> <th>Girls</th> <th>Boys</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Harry Roberts Nursery School</td> <td>33</td> <td>48</td> <td>81</td> </tr> <tr> <td>Ben Jonson Primary School</td> <td>271</td> <td>305</td> <td>576</td> </tr> </tbody> </table> <p><u>Staff:</u></p> <p>The staff gender breakdown is weighted heavily towards women at both schools (see table below), as is the case across most primary school provision in the borough and elsewhere. However, as no redundancies are proposed no disproportionate impact on either gender is anticipated.</p> <table border="1" data-bbox="560 1181 1433 1292"> <thead> <tr> <th></th> <th>Female</th> <th>Male</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Harry Roberts Nursery School</td> <td>18</td> <td>0</td> <td>18</td> </tr> <tr> <td>Ben Jonson Primary School</td> <td>109</td> <td>17</td> <td>126</td> </tr> </tbody> </table>		Girls	Boys	Total	Harry Roberts Nursery School	33	48	81	Ben Jonson Primary School	271	305	576		Female	Male	Total	Harry Roberts Nursery School	18	0	18	Ben Jonson Primary School	109	17	126
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<b>Race</b>		✓	<p><u>Pupils:</u></p> <p>Harry Roberts Nursery and Ben Jonson Primary Schools have a similar pupil demographic in terms of ethnicity, as evidenced</p>																								



below:

Ethnicity	Harry Roberts Nursery School	Ben Jonson Primary School
Any Other Asian Background	1	4
Any Other Black Background		1
Any Other Ethnic Group	1	14
Any Other Mixed Background	4	13
Any Other White Background		10
Bangladeshi	65	491
Black - Any Other Black African Background		6
Black - Somali	1	14
Black Caribbean		3
Indian		1
Pakistani	2	4
White - British	2	10
White and Asian		2
White and Black African		1
White and Black Caribbean		1
Vietnamese		1
Information Not Yet Obtained	5	
<b>Total</b>	<b>81</b>	<b>576</b>

Pupils:

	EAL	Not EAL	Total
Harry Roberts Nursery School	70	11	81
Ben Jonson Primary School	408	168	576

Merging the schools will not cause any significant changes to the pupil demographic of the new school, with Bangladeshi children still the main ethnicity. Both schools have pupils with English as an additional language (EAL) so will be able to share best practice with how to support children who are bi/multi-lingual. All pupils, irrespective of ethnicity, will also benefit from



the long-term stability that should be achieved through the merger.

Staff:

Both schools have a similar staff demographic in terms of ethnicity (as evidenced below), with Bangladeshi staff in the majority. This also reflects the pupils' ethnic demography in both schools. Under the proposed amalgamation very little change is anticipated for staff on a day-to-day basis and staff conditions of service will not be affected. Because of this, no particular ethnic group will be disadvantaged over another and children of all ethnicities will therefore benefit from the continuity of having the same known staff at the school.

Ethnicity	Harry Roberts Nursery School	Ben Jonson Primary School
Any Other Asian Background		
Any Other Black Background	1	
Any Other Ethnic Group		
Any Other Mixed Background		
Any Other White Background	1	7
Bangladeshi	9	78
Black – Any Other Black African Background		1
Black – Somali	1	3
Black Caribbean	1	2
Chinese		
Indian		1
Pakistani		1
White – British	5	33
White – Irish		
White and Asian		
White and Black African		
White and Black Caribbean		
Refused		
Vietnamese		



			Total				
<b>Religion or Philosophical belief</b>		✓	No impact identified – no data collected and neither school is a faith school.				
<b>Sexual Orientation</b>		✓	No impact identified – no data collected				
<b>Gender re-assignment</b>		✓	No impact identified – no data collected				
People who have a <b>Disability</b> (Physical, learning difficulties, mental health and medical conditions)		✓	The table below shows that there are no pupils in the Nursery School with Education, Health & Care (EHC) Plans, whilst 5% of pupils in the Primary School have EHC Plans, though the percentage of pupils on SEN support is slightly higher in the Nursery School. Merging the two schools will ensure that a child’s transition from infant to juniors will be seamless, and embed a robust, inclusive approach to supporting children with SEND from age 3 to age 11. This will be fulfilled by the approved development of a primary SEMH resource provision that would be based at Ben Jonson Primary School from September 2021.				
				SEN Support	EHC Plan	None	Grand Total
			Harry Roberts Nursery School	10	0	71	81
			Ben Jonson Primary School	45	30	502	576
<b>Marriage and Civil Partnerships</b> status		✓	No impact identified – no data collected				
People who are <b>Pregnant and Maternity</b>		✓	No impact identified – no data collected				
<b>Parents and Carers</b>		✓	<p><u>Parents:</u> Formal and informal responses to the first stage consultation were largely positive, with carers and parents seeing the amalgamation as a natural next step for two successful schools. In addition, merging the two schools would give parents the reassurance that their child will not have to change school after Nursery, which adds another transition. This is especially important after COVID-19, which caused an unnatural and unexpected break in most children’s schooling.</p> <p>Ofsted report for both schools outlines that parental engagement and support is overwhelmingly positive. Merging the two schools together will allow for this support to be further developed, with the continued strengthening of existing community links.</p>				





<b>Socio and Economic</b>		✓	<p><u>Pupils:</u></p> <p>Harry Roberts Nursery and Ben Jonson Primary share a very similar socio-economic background, with the proportion of pupils receiving Free School Meals (FSM) in the Primary School much higher than in the Nursery School.</p> <table border="1" data-bbox="560 406 1825 518"> <thead> <tr> <th></th> <th>FSM Eligible</th> <th>No FSM</th> <th>%</th> <th>Grand Total</th> </tr> </thead> <tbody> <tr> <td>Harry Roberts Nursery School</td> <td>9</td> <td>72</td> <td>11</td> <td>81</td> </tr> <tr> <td>Ben Jonson Primary School</td> <td>210</td> <td>366</td> <td>36</td> <td>576</td> </tr> </tbody> </table> <p>Merging both schools should benefit children of all backgrounds via the sharing of existing good practice. "Pupil premium funding is used effectively to support disadvantaged pupils. Any barriers to learning are quickly identified, and intervention activities are targeted to close gaps that help them learn. Consequently, disadvantaged pupils and other vulnerable pupils make good progress in most year groups." Ofsted 2012 - Ben Jonson Primary School.</p>		FSM Eligible	No FSM	%	Grand Total	Harry Roberts Nursery School	9	72	11	81	Ben Jonson Primary School	210	366	36	576
	FSM Eligible	No FSM	%	Grand Total														
Harry Roberts Nursery School	9	72	11	81														
Ben Jonson Primary School	210	366	36	576														
<b>People with different Gender Identities</b>		✓	No impact identified – no data collected															

If you have answered **Yes** to one or more of the groups of people listed above, **a full Equality Impact Assessment is required.** The only exceptions to this are listed in sections 5.1 and 5.2 of this document.

**Section 4.0: Justifying Discrimination:**

**Are all risks of inequalities identified capable of being justified because there is a:**

- (i) *Genuine Reason* for implementation
- (ii) The activity represents a *Proportionate Means* of achieving a *Legitimate Council Aim*
- (iii) There is a *Genuine Occupational Requirement* for the council to implement this activity

✓

✓
✓

**Section 5.0: Conclusion**

Before answering the next question, please note that there are generally only two reasons a full Equality Impact Analysis is not required. These are:



5.1 The policy, activity or proposal is likely to have **no or minimal impact** on the groups listed in section three of this document.

5.2 Any discrimination or disadvantage identified is **capable of being justified** for one or more of the reasons detailed in the previous section of this document.

### 5.3 Conclusion Details:

5.4 Do you recommend a fully Equality Impact Analysis is performed ?

Yes

No

If you have answered **YES** to this question, please proceed to section 6.0 Sign Off.

If you have answered **NO** to this question, please detail your reasons in section 5.5 (across) before proceeding to section 6.0 Sign Off.

5.5 Reasons a full Equality Impact Analysis is not required:

On a day-to-day basis, very little will change for children as there will be no need for any pupils to move to another school under this proposal. The care and importance given to each individual child, which is a strength of both schools, will always remain paramount. As a result, the impact on pupils with protected characteristics will not be significant, with no one group more adversely affected than others.

Owing to falling rolls and reduced funding, Harry Roberts Nursery are currently undergoing a staff restructure unrelated to the proposed amalgamation, however some members of staff at the nursery school appeared to attribute the restructure as being a consequence of the amalgamation.. This therefore needs to be reclarified in future staff sessions regarding the staffing re-organisation.

Very little change is anticipated for staff on a day-to-day basis under the proposal, All staff employed at the Nursery and Primary Schools (at the time of the proposed amalgamation) would automatically continue their employment in the new primary school, and their rights would be preserved under TUPE. If the amalgamation progresses, there will be a full HR consultation following processes agreed with the unions, to maximise staff strengths and build on their expertise and good will. Where there are duplicates of posts, creative solutions will be sought to retain staff. As a result, the impact on staff with protected characteristics will not be significant, with no one group more adversely affected than others.

Based on the findings of the EA, the proposal is robust. The proposal ensures increased equality of opportunity in regard to improved educational outcomes for all Harry Roberts Nursery and Ben Jonson Primary pupils. This would ensure that pupils will leave primary education with a robust education and having had the opportunity to participate in enriching extra-curricular activities. It is anticipated that an amalgamation will further enhance community links, with shared resources and outreach strategies helping to build upon existing successful programme of activities. Nursery provision will continue to provide the universal 15 funded hours for all 3- and 4-year olds as well as 30 funded hours for 3 and 4 year olds with working parents.



**Section 6.0: Sign Off:**

Signed .....

Date: .....

Name: .....

Position: .....