

# Equality Analysis (EA)

## Section 1 – General Information (Aims and Objectives)

Name of the proposal including aims, objectives and purpose  
(Please note – for the purpose of this doc, ‘proposal’ refers to a policy, function, strategy or project)

### Planning for School Places 2019/20 Amalgamation of St Anne’s and Guardian Angels

This Equalities Impact Assessment concerns the proposal to amalgamate Guardian Angels and St. Anne’s Primary Schools, whereby Guardian Angels would close and its pupils would transfer to St Anne’s, should their parents choose to take up a place there. A new school would therefore be created.

Tower Hamlets has a great tradition of excellent education; it values the important role that schools have in increasing the life chances of its children. However, the borough is now in a position where there is the need for longer term planning to maintain the success and future sustainability of its schools.

Demand for school places is driven by population growth and housing development. Although population growth in Tower Hamlets is among the fastest in the country, it has not translated into the expected increased demand for primary school places. Falling birth rates, changing resident demographics and young families migrating out of the borough have resulted in a significant surplus of primary school places in some areas of the borough. As of January 2019, there is a 6.5% surplus in primary school places (1656 are unfilled). This is over the recommended 5% surplus that urban local authorities are recommended to operate with. The 5% surplus is designed to allow local authorities to meet their statutory duty to provide sufficient school places, yet still enable parents to have some choice of schools.

The impact of falling rolls in certain areas of the borough, reductions in education funding and schools in financial deficit, present several challenges. It has therefore been necessary to consider making changes that will ensure we have the right provision in the right place at the right time going forward. Provision that can be well resourced and is of high quality will enable schools to continue to thrive and offer the opportunities that children deserve: a strong curriculum with excellent teaching, enriching activities and a joyful experience at primary school.

St Anne’s Primary School has been included in the review of primary school places owing to falling rolls over the last four years, meaning lower numbers have joined the school. However, strong leadership and governance, coupled with good financial management means that the school has remained financially viable. Guardian Angels has been supported by the headteacher from St Anne’s since Spring 2019, following the resignation of the headteacher and Chair of Governors. Guardian Angels has a budget deficit of around £300,000 and would be unable to replay any loan owing to falling numbers which has created financial instability. In view of this, it was agreed that Guardian Angels would also be brought into the review. The review aims to safeguard the high-quality provision that exists within our schools and is being developed in collaboration with school leaders and other key stakeholders.

See Appendix A

Current decision  
rating



The work at Guardian Angels and St Anne’s is in partnership with the Roman Catholic Diocese of Westminster being planned and supported through the LA’s work with the Tower Hamlets Education Partnership (THEP), which plays a key role in enabling schools to meet the challenge of ensuring that all children and young people in Tower Hamlets achieve the best possible outcomes and can flourish if schools are working in effective partnerships. Ultimately, access to good quality school places is essential to raising achievement and addressing poverty and inequality in the long term. The reorganisation of school provision and the development of new schools in certain areas of the borough should have a positive impact on all groups by improving accessibility, increasing parental choice and promoting inclusive education.

**Conclusion - To be completed at the end of the Equality Analysis process**

*(the exec summary will provide an update on the findings of the EA and what outcome there has been as a result. For example, based on the findings of the EA, the proposal was rejected as the impact on a particular group was unreasonable and did not give due regard. Or, based on the EA, the proposal was amended and alternative steps taken)*

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 Guardian Angels and St Anne’s pupils. This should ensure that these pupils will leave primary education with a robust education and having had the opportunity to participate in enriching extra-curricular activities.

**EA completed by: Elizabeth Freer**  
(officer completing the EA)

**EA signed off by: Terry Bryan**  
(service head)

**Date signed off: 6 March 2020**  
(approved)

Service area:  
SPP

Team name:  
Children and Culture

Name and role of the officer completing the EA:  
Elizabeth Freer, Strategy and Policy Manager

**Section 2 – Evidence (Consideration of Data and Information)**

What initial evidence do we have which may help us think about the impacts or likely impacts on service users or staff?

The following evidence has been considered:

**Engagement evidence**

The schools’ governing bodies have undertaken an initial, informal consultation between 4<sup>th</sup> November 2019 and 13<sup>th</sup> December 2019 with their communities after forming a steering group consisting of Chairs, deputy Chairs and Headteachers from both schools. They have been supported by an independent consultant. Since September 2019, when the schools were first identified as being “in scope” for review by the local authority, they have met regularly. Both governing bodies agreed to consult in the Autumn Term 2019, and shared this information with parents and staff, as well as circulating a letter about the review to all parents. A consultation document, agreed with the local authority and the Roman Catholic diocese of Westminster, was circulated via email, paper versions and placed on the school websites. Open Information Sessions in the morning and evening were held at the Professional Development Centre in Bethnal Green on 11th December 2019. Following the decision of Cabinet to progress to statutory consultation, statutory notices were published in February 2020, as well as letters being sent to parents on 6th February 2020 to invite feedback on the statutory notice.

The following meetings have been held:

Guardian Angels

Staff meetings have been held regularly and they met with trade union representatives on 13<sup>th</sup> November 2019  
Parent meetings were held on 13<sup>th</sup> and 20<sup>th</sup> November 2019. A coffee meeting was held at the school on 28<sup>th</sup> November.

Children have discussed the proposal in assemblies and in their classes

St. Anne’s

Staff meetings have been held regularly and they met with trade union representatives on 14<sup>th</sup> November 2019  
Parent meetings were held on 14<sup>th</sup> and 20<sup>th</sup> November 2019. A coffee meeting was held at the school on 27<sup>th</sup> November .

Children have discussed the proposal in assemblies and in their classes

**Other Evidence**

Ofsted reports

Pupil projections

School census data of Guardian Angels and St Anne’s and London Borough of Tower Hamlets

Demographic data held on staff and pupils at Guardian Angels and St Anne’s

**Section 3 – Assessing the Impacts on the Equality Groups**

Please refer to the guidance notes and evidence with sources how your proposal impacts upon the equality groups and our Equality Duty (for information on the Public Sector Equality Duty, please refer to the guidance notes).

**Remember -**

You must act to eliminate any potential negative impact which, if it occurred would breach the Equality Act 2010. In some situations, this could mean abandoning your proposed change as you may not be able to take action to mitigate all negative impacts.

When you act to reduce any negative impact or maximise any positive impact, you must ensure that this does not create a negative impact on service users and/or staff belonging to groups that share protected characteristics.

Reports/stats/data can be added as an Appendix.

Equality Groups	Impact			Reason(s)
	Positive	Neutral	Negative	
	What impact will the proposal have on specific groups of service users or staff?			<ul style="list-style-type: none"> <li>• Please add a narrative to justify your claims around impacts and,</li> <li>• Please describe the analysis and interpretation of evidence to support your conclusion as this will inform decision making</li> </ul>
<b>Protected characteristics</b>				
Age	X			Changing schools during any phase of education can be viewed as possibly disruptive. To ease any possible disruption, the change is proposed to take place between academic years. This will allow the current Year 6 pupils to continue to attend their current school before they transition to secondary school, thereby minimising any potential disruption. It also reduces the number of pupils affected, as the 29 pupils in year 6 at Guardian Angels and 35 at St Anne’s will have moved on to secondary school. Children in Year 2 preparing for SATs will be able to take the tests at their current school in a familiar environment.  As the purpose of this proposal is to ensure that all children in the borough have access to sustainable, high quality education, there is a clear benefit for all Guardian Angels pupils who are currently at a school which

Ofsted judged to “Require Improvement” in September 2018, dropping from “Good”. Ofsted, the regulatory body and sole arbiter of quality, identified that “Pupils’ progress remains inconsistent across the school” and asked for an external review of governance to be undertaken. Conversely, St Anne’s is graded “Good” as “Teachers provide well-structured lessons that help pupils make good progress”.

18% of pupils at St Anne’s achieve at a higher standard in reading, writing and maths, as do a similar percentage of children at Guardian Angels: 15%. The progress score for both schools is average in all areas, except St Anne’s is “Above Average” for Writing. Combining staff and pupils from both schools should enhance the current offer at St Anne’s, as staff will bring with them additional skills and share best practice.

Both schools have been experiencing a decline in pupil numbers from 2015 onwards, although St Anne’s has been impacted less as numbers have increased since 2017. St Anne’s received almost triple the amount of first choice applications in 2019 than Guardian Angels did. This means that, currently, reception and year 1 pupils at Guardian Angels are in the same class, despite significant teaching and curriculum differences between the EYFS and KS1, which is not ideal.

School	PAN	Total applications to reception				
		2015	2016	2017	2018	2019
St Anne’s	50	78	75	49	57	57
Guardian Angels	30	74	88	76	60	34

School	PAN	First Choice Applications				
		2015	2016	2017	2018	2019
St Anne’s	50	Unavailable	31	21	26	34
Guardian Angels	30	Unavailable	29	20	15	13

St Anne’s also provides nursery provision for children aged 2 upwards, thereby allowing parents with younger children to access a nursery place at their child’s school, rather than going elsewhere, including funded places for the most disadvantaged 2 year olds, as well as 30 hours a week for working parents.

				<p>As a school’s financial position is based on the number of children on roll, operating at capacity is imperative to ensure there is the budget to offer a rich curriculum, as well as extra-curricular activities. Owing to a sizeable budget deficit, the extracurricular offer at Guardian Angels has been reduced. St Anne’s has a robust after school club offer which, for this academic year, includes Drama, Choir, Zumba and Science, Home Learning and Irish Dancing, Science and Karate, Chess and Sports. Pupils at Guardian Angels will benefit from access to this, as will their parents as the clubs are either free or low-cost, thereby reducing childcare costs. An extended school day is also beneficial for working parents.</p> <p>The impact on staff, who will also join together to form one staffing structure, will depend on the new structure, but the majority of staff is likely to be the same. Any process will be agreed by LBTH and unions. During the informal consultation, parents at both schools identified that joining the two schools would lead to increased staffing levels and other resources, sustainable finances and increased potential for school improvement. They also expressed hope that amalgamation would increase the range of specialist skills their children would have access to, owing to the possibility of a wider range of curriculum experts on staff, thereby reducing the inconsistencies in teaching at Guardian Angels, as identified by Ofsted. Indeed, the current support offered by the headteacher at St Anne’s has led to improvements in teaching at Guardian Angels.</p> <p>Staff fed back positive reasons to support amalgamation, as they have concerns that continuous falling numbers would lead to job losses, but acknowledged that amalgamation, coupled with a new staffing structure, may also result in changes.</p>
Disability	X			<p>There are 4 pupils on roll with identified Special Educational Needs/Disabilities (SEND) at Guardian Angels who have an Education, Health and Care Plan (EHCP) and 22 pupils receiving SEN support but none are in receipt of SEND transport. At St Anne’s, there are 6 children with identified SEND who have an EHCP and 68 children in receipt of SEN support. 12 of these children are currently in year 6, so will have transitioned to secondary school by the time this proposal, is approved, takes effect. One child at St Anne’s is in receipt of SEND transport. As their journey to school will remain the same, this transport will remain unaffected by this proposal. Although children with SEND may be “disadvantaged” by a change of school, the transition will be eased by the change occurring over the summer holidays.</p> <p>The new school will need to ensure that it continues its robust, inclusive approach to supporting children with SEND, as St Anne’s currently does, which was identified by Ofsted at their last inspection: <i>“Pupils who have special educational needs or disability are very well supported. Relationships with parents are strong and they are included in their children’s learning.”</i></p>

			<p>In order to make sure any unknown special needs are picked up early, there are strong processes in place at St Anne’s. SENCOs work closely within the senior leadership team and in discussion with teachers and teaching assistants in school to identify children who have SEND. They use a number of additional indicators of special educational needs:</p> <ul style="list-style-type: none"> <li>• The analysis of whole school and individual tracking data, termly whole school assessments and individual assessments of pupils as necessary</li> <li>• The following up of teacher concerns and ongoing professional discussion</li> <li>• Termly pupil progress meetings with class teachers, members of SLT and SENCOs</li> <li>• Following up parental concerns</li> <li>• Tracking individual pupil progress over time</li> <li>• Information from previous schools on transfer</li> <li>• Information from other services</li> </ul> <p>Therefore, regular assessment and monitoring procedures, including the review of termly assessments, will continue throughout a children’s time at school to look out for any special needs that may develop later. This should particularly benefit the children currently at Guardian Angels, as joining the two schools together will also maximise resources and ensure that all pupils with SEND have access to enhanced provision through the expertise that exists particularly at St Anne’s. Currently, some pupils with SEMH needs attend specialist provision at St Anne’s, which Guardian Angels could not provide and are driven to and from their sessions by school staff. St Anne’s is also an accessible school, and in a good state of repair with enough empty space to be able to accommodate children from Guardian Angels. Any required additional capital works will be assessed and provided.</p> <p>Annual Reviews for students with EHCPs will be brought forward to ensure their needs are being met and will continue to be met. The progress for students with SEND will be regularly reviewed. Support with transitions and integration into St Anne’s will be offered by the Parent and Family Support Service.</p> <p>During the informal consultation period, parents also identified that joining the schools would lead to increased play space at St Anne’s. The playground was extended and revamped by the Diocese in September 2018. It is unclear whether those parents have children with SEND, but increased access to more space will benefit all children.</p> <p>All children from Guardian Angels, including those with SEND, may have to travel further to school, and</p>
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				therefore may be eligible for a Local Authority travel grant. However, governors are exploring all travel options in conjunction with the local authority, should the two schools join.																		
Sex		X		<p>Currently, at Guardian Angels, there are more girls than boys, and vice versa at St Anne’s. Therefore, joining the two schools will ensure there is a more equal gender breakdown. Work is already underway to ensure that pupils meet and can make friendships before the amalgamation, if it occurs, through football matches and class visits. All pupils, irrespective of gender, will also benefit from the improved educational outcomes that should be achieved through joining the two schools.</p> <table border="1"> <thead> <tr> <th>School</th> <th>F</th> <th>M</th> </tr> </thead> <tbody> <tr> <td>Guardian Angels</td> <td>108</td> <td>78</td> </tr> <tr> <td>St Anne’s</td> <td>125</td> <td>146</td> </tr> </tbody> </table> <p>The staff gender breakdown is weighted heavily towards women at both schools, meaning there will be more of an adverse impact, if there are due to be redundancies with the new staffing structure, on females. However, this is purely because more women than men are employed, as is the case in most primary school provision in this borough and elsewhere. The majority of staff is expected to be the same and change management support is being planned in the event of the two schools joining.</p> <table border="1"> <thead> <tr> <th>School</th> <th>Female</th> <th>Male</th> </tr> </thead> <tbody> <tr> <td>Guardian Angels</td> <td>26</td> <td>4</td> </tr> <tr> <td>St Anne's</td> <td>46</td> <td>4</td> </tr> </tbody> </table>	School	F	M	Guardian Angels	108	78	St Anne’s	125	146	School	Female	Male	Guardian Angels	26	4	St Anne's	46	4
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St Anne’s	125	146																				
School	Female	Male																				
Guardian Angels	26	4																				
St Anne's	46	4																				
Gender reassignment		X		No impact identified.																		
Marriage or civil partnership		X		No impact identified.																		
Religion or belief		X		<p>Both Guardian Angels and St Anne’s are Roman Catholic schools. Approximately 50% of pupils at both schools identify as Catholic. Therefore, the religious provision children will receive will not change.</p> <p>Catholic school intake is currently around 8% of intake across all schools, although there is capacity for 11%, and nearly all LBTH Catholic schools currently accept non-Catholic children owing to vacancies. The proposed amalgamation would alter the capacity to 10%, which would still be above the current needed number. Without non-Catholic children at Catholic schools, a number of faith schools in Tower Hamlets would not be financially viable. However, the current plan for amalgamation enables Guardian Angels children to have the</p>																		

option to continue in Catholic provision, although parents are able to opt for a non-denominational school should they prefer.

Parents recognised during the informal consultation that joining the two schools would protect quality Catholic education in the borough. Amalgamation should lead to more equality of opportunity for all pupils, both Catholic and non-Catholic. Guardian Angels pupils will have the additional opportunity of studying philosophy for children, as well as RE, should they move to St Anne’s. Philosophy for Children offers a way to open up children’s learning through enquiry and the exploration of ideas. Children learn that their ideas have value, and that the ideas of other children have value too, thereby helping to promote community cohesion.

During the formal consultation period, it was suggested that, by closing Guardian Angels, there would be a lack of primary school places for Catholics in the borough in the future. The closure of Guardian Angels should not deprive future children of a local catholic provision as there will still be the option for parents to apply for the nearby St Agnes RC School where Catholic children would have priority. Population trends have also identified that demographic changes in the Borough are seeing a significant pupil population shift. This means the number of places at schools in the west of the borough will need to be reduced and the number of places in the east of the borough will need to be increased to meet demand in the east and ensure schools in the west are financially sustainable.

Race X Guardian Angels and St Anne’s have a similar pupil demographic in terms of ethnicity, as evidenced below (data from school census 2018, which is the last validated data currently available).

Ethnicity	Guardian Angels	St Anne’s
Any Other Asian Background	3	2
Any Other Black Background	10	5
Any Other Ethnic Group	3	14
Any Other Mixed Background	27	19
Any Other White Background	13	38
Bangladeshi	5	12
Black - Any Other Black African Background	29	40
Black - Somali	0	2
Black Caribbean	12	15
Chinese	2	1

<b>Indian</b>	<b>7</b>	<b>0</b>
<b>Information Not Yet Obtained</b>	<b>9</b>	<b>10</b>
<b>Pakistani</b>	<b>0</b>	<b>0</b>
<b>Refused</b>	<b>0</b>	<b>2</b>
<b>Vietnamese</b>	<b>2</b>	<b>2</b>
<b>White - British</b>	<b>59</b>	<b>82</b>
<b>White - Irish</b>	<b>0</b>	<b>2</b>
<b>White and Asian</b>	<b>1</b>	<b>4</b>
<b>White and Black African</b>	<b>0</b>	<b>4</b>
<b>White and Black Caribbean</b>	<b>4</b>	<b>17</b>

Joining the schools will not cause any significant changes to the pupil demographic of the new school, with White British children still the largest ethnicity. Both schools have pupils with English as an additional language so will be able to share best practice with how to support children who are bi/multi-lingual. All children upon reaching Key Stage 2 will have access to Spanish lessons, thereby enhancing their language skills and abilities. All pupils, irrespective of ethnicity, will also benefit from the improved educational outcomes that should be achieved through joining the two schools.

Joining the two schools with a new staffing structure may have more of an impact on White British staff, as more staff from this ethnicity are employed. However, the ethnicity of staff would still reflect the demographic of pupils.

<b>Ethnicity</b>	<b>Guardian Angels</b>	<b>St Anne's</b>
Any Other White Background	1	2
Bangladeshi	1	1
Black - African	1	0
Black and Any Other Ethnic Group	1	1
Black Caribbean	7	2
Indian	0	1
Information Not Yet Obtained	7	6

Appendix 4 – EA for Guardian Angels and St Anne’s RC Schools Amalgamation | 2020

				Other Mixed background	0	1
				White - British	7	25
				White - English	2	3
				White- European	0	3
				White - Irish	2	4
				White and Black Caribbean	1	0
				White and Asian	0	1
Sexual orientation		X		No impact identified. No data on sexual orientation collected.		
Pregnancy or maternity		X		No impact identified. No data collected.		
<b>Other</b>						
Socio-economic	X			<p>Guardian Angels and St Anne’s pupils share a similar socio-economic background, with approximately 47% of pupils at St Anne’s eligible for Free School Meals, compared to the slightly higher proportion of 49% at Guardian Angels.</p> <p>In addition to the afterschool clubs at St Anne’s, a breakfast club is also run by the charity Magic Breakfast. Every child attending St Anne’s, which will include any Guardian Angels pupils who move, has access to a healthy breakfast to start their school day so that they can make the most of their learning. Breakfast is free and children can arrive any time between 8.00am and 8.45am and choose from a variety of cereals, porridge, bagels, juice and milk. Bagels are also available for all children free of charge in the playground before school.</p> <p>As parents expressed during the informal consultation, joining the two schools would lead to enhanced extracurricular opportunities, such as trips to museums, and extended provision, which greatly benefits working parents. Nursery provision for children aged 2 upwards would also provide funded places for the 40% most disadvantaged two year olds, as well as 30 funded hours for 3 and 4 year olds with working parents and 15 universal hours for all 3 and 4 year olds.</p>		
Parents/Carers		X		As previously mentioned, the majority of parents who responded to the informal consultation by returning forms are positive about the amalgamation, stressing the importance of maintaining a high standard of education was paramount to any change being successful. Their concerns focussed around the cost of a new		

				<p>school uniform, the increased journey to school and the location of St Anne’s.</p> <p>The decision about a new uniform is being undertaken by the governing bodies, which may choose to offer financial assistance should the decision be taken to amalgamate the two schools.</p> <p>St Anne’s, unlike other Catholic schools in the borough, has the space for all Guardian Angels’ pupils if required. This is not the case for other schools, which would mean needing to keep two buildings open, leading therefore to higher premises and management costs. The location of St Anne’s was perceived to be in a less safe place than Guardian Angels by some parents, despite it being down a quiet residential street. They have been reassured upon visiting the site. The Whitechapel area does have more people and therefore is at more risk of ASB and crime. However, it also has more focused resources to deal with any issues, such as THEOs.</p> <p>The local authority and the diocese will consider a range of options for ensuring that the Guardian Angels site remains of benefit to the Christian community if the decision to join the two schools is taken.</p> <p>The travel distance to St Anne’s will be longer for most Guardian Angels’ pupils. An analysis of the distance to school from the home address of Guardian Angels’ pupils:</p> <table border="1" data-bbox="772 798 1391 1038"> <thead> <tr> <th colspan="3">Reception to Year 2</th> </tr> <tr> <th>Distance to school</th> <th>Guardian Angels</th> <th>St Anne’s</th> </tr> </thead> <tbody> <tr> <td>Less than 2 miles</td> <td>50</td> <td>26</td> </tr> <tr> <td>Greater than 2 miles</td> <td>5</td> <td>29</td> </tr> </tbody> </table> <table border="1" data-bbox="772 1077 1391 1318"> <thead> <tr> <th colspan="3">Year 3 - Year 5</th> </tr> <tr> <th>Distance to school</th> <th>Guardian Angels</th> <th>St Anne’s</th> </tr> </thead> <tbody> <tr> <td>Less than 3 miles</td> <td>80</td> <td>72</td> </tr> <tr> <td>Greater than 3 miles</td> <td>4</td> <td>12</td> </tr> </tbody> </table> <p>Under the LA’s current Travel Assistance Policy, 41 pupils would be eligible for travel assistance. Representations made during the formal consultation period suggested that some parents would not be able to</p>	Reception to Year 2			Distance to school	Guardian Angels	St Anne’s	Less than 2 miles	50	26	Greater than 2 miles	5	29	Year 3 - Year 5			Distance to school	Guardian Angels	St Anne’s	Less than 3 miles	80	72	Greater than 3 miles	4	12
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				take their child/ren to and from school if they moved from Guardian Angels to St Anne’s, especially if they had children at other schools/provision. The Local Authority and Diocese are cognisant of this issue and are working with the governing bodies of the two schools to review possible travel arrangements.
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**Section 4 – Statutory Duties**

Tick the relevant box(es) to indicate whether the proposed change will adversely impact on the Council’s ability to meet any aspect of the Public Sector Duty as set out in the Equality Act 2010:

- Advancing equality of opportunity between people who belong to protected groups
- Eliminating unlawful discrimination, harassment and victimisation
- Fostering good relations between people who belong to protected characteristic groups

If the proposed change adversely impacts on the Council’s ability to meet any of the Public Sector Duties set out above, mitigating actions must be outlined in the Action Plan in Section 5 below.

**Section 5 - Action Plan**

As a result of these conclusions and recommendations what actions (if any) **will** be included in your business planning and wider review processes (team plan)? Please consider any gaps or areas needing further attention in the table below the example.

**Example**

Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Progress
1. Better collection of feedback, consultation and data sources  2. Non-discriminatory behaviour	1. Create and use feedback forms. Consult other providers and experts  2. Regular awareness at staff meetings. Train staff in specialist courses	1. Forms ready for January 2020 Start consultations Jan 2020  2. Raise awareness at one staff meeting a month. At least 2 specialist courses to be run per year for staff.	1. NR & PB  2. NR	

**Your action plan**

Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Progress

**Section 6 – Monitoring**

Have monitoring processes been put in place to check the delivery of the above action plan and impact on equality groups?

Yes?                      No?

Please state how this will be undertaken.

**Appendix A**

**Equality Assessment Criteria**

Decision	Action	Risk
<p>As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i>. It is recommended that the use of the policy be suspended until further work or analysis is performed.</p>	<p><b>Suspend – Further Work Required</b></p>	<p><b>Red</b></p> 
<p>As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i>. However, a genuine determining reason may exist that could legitimise or justify the use of this policy.</p>	<p><b>Further (specialist) advice should be taken</b></p>	<p><b>Red Amber</b></p> 
<p>As a result of performing the analysis, it is evident that a risk of discrimination (as described above) exists and this risk may be removed or reduced by implementing the actions detailed within the <i>Action Planning</i> section of this document.</p>	<p><b>Proceed pending agreement of mitigating action</b></p>	<p><b>Amber</b></p> 
<p>As a result of performing the analysis, the policy, project or function does not appear to have any adverse effects on people who share <i>Protected Characteristics</i> and no further actions are recommended at this stage.</p>	<p><b>Proceed with implementation</b></p>	<p><b>Green:</b></p> 