

Equality Impact Analysis: (EIA)

Section 1: Introduction

Name of Proposal: Closure of Shapla School

For the purpose of this document, 'proposal' refers to a policy, function, strategy or project)

Service area & Directorate responsible Pupil Services, Children & Culture

Name of completing officer Elizabeth Freer

Approved by Director/Head of Service Terry Bryan

Date of approval 14th January 2021

Conclusion - To be completed at the end of the Equality Impact Assessment process

This summary will provide an update on the findings of the EIA and what the outcome is. For example, based on the findings of the EIA, the proposal was rejected as the impact on a particular group was disproportionate and the appropriate mitigations in place. Or, based on the EIA, the proposal was amended and alternative steps taken)

Based on the findings of this EIA, there are no significant issues to prevent moving to the next stage of formal consultation, which is to proceed to the issuing of the statutory notice. This will provide further opportunity for parents, pupils, staff and wider community to give their views and raise any objections.

This proposal will require further analysis of the equalities data on staff who are at risk of redundancy, should the proposal to close the School move forward.

The Equality Act 2010 places a 'General Duty' on all public bodies to have 'due regard' to:

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advancing equality of opportunity between those with 'protected characteristics' and those without them
- Fostering good relations between those with 'protected characteristics' and those without them



Where a proposal is being taken to a Committee, please append the completed equality analysis to the cover report.

This Equality Impact Assessment provides evidence for meeting the Council's commitment to equality and the responsibilities outlined above, for more information about the Councils commitment to equality; please visit the Council's website.

Section 2 – General information about the proposal

Provide a description of the proposal including the relevance of proposal to the general equality duties and protected characteristic pursuant to Equality Act 2010.

Planning for School Places - Closure of Shapla School

This Equality Impact Assessment concerns the proposal to close Shapla School at the end of the 2020/21 academic year. The Local Authority has identified sufficient vacancies at other local schools within close proximity to Shapla, and within a reasonable distance of all current pupils who will require to transfer to a different primary school if Shapla closes. Across the west of Tower Hamlets there are also vacancies in many other schools, giving families a reasonable degree of choice. The neighbouring schools are in a stronger financial position. Shapla is currently rated "Good" by the regulatory body, OFSTED, but there is a risk that the quality of education and the continued access for pupils and their families to extended services and facilities might begin to fall at Shapla, despite the best efforts of the Headteacher, staff and governors.

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. The LA's strategic approach in ensuring the sufficiency and quality of its primary school provision on a locality basis, across the borough, is therefore designed to provide Tower Hamlets with an appropriate mix and number of high performing, financially sustainable schools.

Demand for school places is driven by population growth and housing development. Although population growth in Tower Hamlets is amongst the fastest in the country, it has not translated into the expected increased demand for primary school places across the borough. 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 was a 6.5% surplus in primary school places (1656 were 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 a number of challenges. The significant pupil population changes are affecting schools across the Borough and have resulted in additional pressures for schools in the West. These pressures are not only a reflection of a reduction in their pupil numbers, but also a combination of cash flat Dedicated Schools Grant (DSG) allocations over several years and the national school funding formula changes affecting Tower Hamlets and other London Boroughs. The national funding formula changes came into effect back in 2018-19, but it is evident that the impact in Tower Hamlets will really begin to be felt by schools from this point onwards, as minimum funding guarantees reduce and end.

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.



As of January 2019, in the Wapping catchment area, where Shapla is located, there were 480 reception places available. In January 2019 there were 62 unfilled places, equating to two FTE classes. Projections indicate this will increase to 92 unfilled places by 2027 (three FTE classes). 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.

The work is 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, the guiding principle for this work is that whatever is done should be in children's interests, looking at a range of achievable options that will enable proper opportunity to decide how best to deliver a high quality and sustainable provision. 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.

An Independent Consultant has also been commissioned by LBTH to work with schools, such as Shapla, which were identified as being at risk due to demographic change in the Borough. As well as working with schools, Dr Jenner was asked to produce a public report "Future Ambitions" setting out principles for developing school relationships for resilience and excellence. This document was shared with all Headteachers, Unions and Governors in March 2019. Regular updates on the Primary Review have been included in the termly Director's Report for Governors.

Section 3 – Evidence (Consideration of Data and Information)

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

Shapla is a small school so, as pupil numbers have fallen (Chart 1), the budget has been greatly impacted. For example, in the academic year 2019/20, Reception, Yr1 and Yr2 had below 20 children (Chart 2). Protecting quality education led to Shapla facing significant financial challenge, with no capacity to repay financial support received from the Local Authority within an acceptable time frame without damaging the quality of education for pupils. The Local Authority are not allowed to continue to fund schools that are not financially viable, especially when you consider the further impact of the changes to the National Funding Formula.

Chart 1: Reception Application 2017-2020 by preference (LBTH School Admissions)

Schools	PAN	1st Pref	2nd Pref	3rd Pref	4th Pref	5th Pref	6th Pref	Total 20/21	Total 19/20	Total 18/19	Total 17/18
Bigland Green Primary School	60	85	58	20	14	3	5	185	169	200	173
Blue Gate Fields Infant	90	91	35	15	10	3	6	160	155	189	198
Canon Barnett Primary School	30*	19	16	5	1	3	1	45	50	50	46

¹ The Future Ambitions Report is available on the Tower Hamlets Primary Review Website.



English Martyrs Roman Catholic Primary School	30	31	18	8	10	3	1	71	54	90	63
Harry Gosling Primary School	60	51	30	17	6	4	1	109	103	108	104
Hermitage Primary School	45	29	22	13	6	2	6	78	78	72	91
Shapla Primary School	30	12	11	8	3	2	2	38	39	45	72
St Mary and St Michael Primary School	60	44	13	18	3	3	4	85	82	116	127
St Paul's Whitechapel CofE Primary School	30	31	4	8	7	5	4	59	71	86	84
St Peter's London Docks CofE Primary School	30	41	23	9	6	4	2	85	70	84	93
Grand Total	465	434	230	121	66	32	32	915	871	1040	1051

Chart 2: Shapla Year Groups (Spring Census 2020)

		Year Groups										
School	N1	N2	R	1	2	3	4	5	6	Total		
Shapla	21	2	13	15	18	25	25	28	29	176		

Implications for children

The children will be able to stay at Shapla until the end of the Summer Term 2021, when the current Yr. 6 will then transition to secondary school. Families will be supported to move to neighbouring schools during the Summer Term, if the decision to close is agreed. There are enough vacancies available at neighbouring schools to accommodate all children attending Shapla (Chart 3). The Local Authority has recommended that the group of schools that children transition to is fairly small, to reduce travel distances, but also to support children to transition with other children that they know. However, families who wish to consider other schools closer to their homes will also be supported to do so.

Parents will be able to apply to those schools, and places will be allocated using the usual Tower Hamlets admissions criteria in the Summer Term 2021.

Chart 3: Vacancies at neighbouring schools per year group (LBTH Oct 2019 data)

Please note: Yrs. 5 and 6 are not included in this graph as the pupils who were in Yr 6 in Oct 2019 moved onto secondary school in Sept 2020, and pupils in Yr 5 at the time of this data will have transitioned onto secondary school in Sept 2021. Therefore, children in these age groups are unaffected by this proposal.

School	PAN	Reception	Y1	Y2	Y3	Y4
Shapla	30	14	16	18	25	25
Harry Gosling	60	52	58	52	58	42
St Paul's	30	28	27	28	29	25
Hermitage	45	39	34	39	27	42



English Martyrs	30	29	30	26	25	28
Kobi Nazrul	30	30	30	30	30	25
Numbers	225	192	195	193	194	187
Vacancies		33	30	32	31	38

A full programme to support children through this difficult period will be put in place, with the aim of helping them to recognise that moving school presents new opportunities as well as acknowledging how they have benefitted from their education at Shapla. This will include open days at nearby schools so that parents are able to visit schools now that they have reopened.

Parents will also be given the opportunity to apply for their children to move to other schools before August 2021 through the in-year admissions process.

Consultation

Shapla School Governing Body was prompted by the Tower Hamlets Primary Review to consider the sustainability of Shapla Primary School, given its vulnerability to falling rolls, and reached the conclusion that to close the school and relocate children to other nearby schools may be the best solution to optimising educational provision in the area.

A Steering Group consisting of the Chair, staff governor, parent governor and Headteacher from Shapla, supported by the Independent Consultant has led the work on considering the implications of the review for Shapla.

Governors and the Headteacher have met, in various groupings, regularly since the Local Authority first identified the school as being "in scope" for review, in July 2018.

An Informal Governing Body meeting with governors was held on 10th February 2020 to discuss the Primary Review, the Future Ambitions Report, and the best responses for the school. This Informal meeting recognised the likelihood of a proposal to close Shapla school. The Governing Body met again, virtually, on March 25th, 2020 to consider and agree arrangements for informal consultation.

Local Headteachers met virtually on 20th March 2020 to consider the possible proposal. This same group, and a wider group of Headteachers whose schools might be affected met again on 19th June 2020.

The informal consultation period started on 8th June and ended on 17th July 2020. It was originally planned to start in the first half of the Summer Term 2020, but it was delayed as the implications of coronavirus were considered. After careful consideration, the governors and the LA felt that not to begin consultation in the latter half of the Summer Term was unfair on families and that, by starting to consult, the parents of children due to start in reception in September would have the opportunity to find a different school for them to start their school career where they would be able to remain and avoid another transition.

A consultation document was prepared and agreed with the Local Authority. This was given in paper copy to all parents, circulated to Tower Hamlets Headteachers, through the Headteacher's Bulletin, emailed to trade unions, and the Secretary of State has been notified of potential changes.

Information about the consultation was also placed on the school website: https://shapla.school/consultation/ This included a letter to parents and staff from the Chair of Governors, a copy of the consultation document, and 3 short videos explaining the situation.

Due to the limitations imposed on public gatherings by COVID-19, it was not possible to hold face to face meetings for larger groups at the school or elsewhere. In order to ensure that pupils, parents, staff and the wider



community were able to engage with and respond to consultation a range of opportunities were organised as follows:

- A response form (or any other written format) at the end of the consultation document to record views to be emailed, posted, or handed to the school.
- A special email address was set up for comments
- A box was set up in the playground at Shapla School where people could leave comments, response forms and any questions.
- The independent consultant was available for 1 to 1 socially distanced questions/feedback on Monday
 13th July
- Virtual meetings were set up on July 13th for staff and parents
- Personal phone calls were offered.

Governors agreed responses from the different forms of consultation should be summarised in a report for Governors, to be sent to the Steering Group, by the end of July 2020. The Steering Group reviewed feedback and used it to make a response to the council, on whether or not to recommend proceeding with the school merger proposal. A report summarizing the feedback on the consultation will be available for staff and parents during the first half of the Autumn Term 2020.

Other Evidence

Financial position of Shapla

Ofsted reports

Pupil projections

School census data of Shapla and neighbouring schools

Demographic data held on current staff and pupils at Shapla and neighbouring schools

Equality Act 2010

Minutes of meetings where the future of Shapla has been discussed

Shapla School Organisational Change Procedure

Consultation Document

Consultation Feedback Report

School Policies (Equalities, SEND and Inclusion)

School Admissions Code

Name of officer completing the EIA: Elizabeth Freer

Service area: C&C SPP

EIA signed off by: Terry Bryan

Date signed off:



Section 4 – Assessing the impacts on residents and service delivery

	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups?								
Age (All age groups)			X	A change to schools during any phase of education can be viewed as possibly disruptive. However, year 6 children who left in Summer 2020 will not be impacted, nor will the current year 5 who will also have transitioned to secondary school if this proposal is implemented in September 2021. In addition, the change is proposed to take place between academic years and therefore allow a new start at an appropriate time in each pupil's yearly academic progression, minimising disruption. Therefore, the impact of closure would affect younger pupils at the school. Children moving from reception to y1 may be particularly vulnerable, as may those moving from year 1 to year 2, the year in which children take their SATs. However, the numbers at Shapla for these year groups will be relatively low at 119 pupils. In addition, the educational outcomes for these children should not be adversely impacted by the move to a new school and, could be improved. This is because the Ofsted standard is either 'good' or 'outstanding' for all primary schools. As evidenced by the graph below, each school has particular strengths and these strengths may well allow parents of children at Shapla to decide which of them they would like to apply to, should the proposal go ahead.								
						P	rogress Scor	е	LA Average 72%	LA Average 14%		
				School Ofsted Grade Reading Writing Maths Standard in reading, writing reading, writing and maths								
				Shapla Good Well above average Average Average 80% 5%								
				Harry Gosling Good Well above Above average average 68% 10%								



St Paul's	Outstanding	Well above average	Above average	Well above average	90%	17%
Hermitage	Good	Average	Average	Average	66%	11%
English Martyrs	Good	Average	Average	Average	81%	27%
Kobi Nazrul	Good	Average	Average	Average	74%	7%

It is recognised, through the analysis, there is a need to ensure that siblings would be able to attend the same school, should Shapla close. Although the LA cannot guarantee all parents will get their first preference, it is committed to ensuring that siblings remain together and this will be achieved through the application of the admissions process.

In response to parents expressing concerns during the informal consultation period about the impact on their children should Shapla close, there is a commitment that staff at Shapla school will help to arrange visits for the children to their new schools, and for teachers from those schools to visit Shapla. Just as the end of every Summer Term includes celebrations for Year 6 leavers, if the school closes in Summer 2021 there will be a full programme of events and activities to support the children and staff to manage the changes.

The Shapla financial position is such that it is recognised that were it remain open this would eventually adversely affect the quality of education that the school has been able to provide, thereby impacting on children of all ages.

There will also be an impact on staff at the school, who could be made redundant under the proposal. The spread of staff across the age bands is fairly even, with those under 30 and above 60 less affected than those aged 30-59. Staff in their 40s will be more affected than other age groups. If we compare Shapla to its neighbouring schools, it is evident that most schools have a staff group where the age groups are more heavily weighted:



				%	Staff in ea	ch age gro	ир	
		School	20s	30s	40s	50s	60s	70 s
		Shapla	8	19	39	25	8	0
		Harry Gosling	32	39	17	7	4	0
		St Paul's	18	27	27	21	3	3
		Hermitage	10	40	16	28	6	0
		English Martyrs	8	8	24	42	12	8
		Kobi Nazrul	8	50	29	30	0	0
ability	X	and governing bo process. Pupils	ody to ensu	ire that the	ey are to ful	lfil their rol	e effective	ly suppor
hysical, arning ficulties, mental alth and edical nditions)		At Shapla, of the school closing,2% impact a change disproportionate preferred choice	6 have an E of school c impact in of school.	HCP and 6 an have or children w	% have SEN I children w th SEND, e	ID support vith SEND, specially as	. Whilst this these numl s they will b	s EIA does bers do no pe given p
		Over the academ opportunity to er provided at Shap to identify in class are confident and ahead and the children forward resourced.	nsure a sea la. Ofsted s because d learn quid iildren mov	imless tran noted, "Pu _l the suppor ckly." This f ve to a new	sition for cloils who ha to they recein oundation, oundscool. It	hildren wit ve special of ve is well fo , laid by Sha would be p	h SEND, bueducationa ocused and apla, should orudent to	ilding on Il needs ar I unobtrus d help gre bring the



		1		OWER HAMLETS				
		Staff						
		be provide redeploym	ed in this EIA nent process	Although tes must be	his does no mindful of t	ot represent the needs of	a dispropor f staff with S	entification. Therefore, numbers wi rtionate impact on staff, any possib SEND and take into account the Equadrantaged by the process.
	X	Pupils	iroraer to e	isare trief o		acca ag	sanior or alo	advantaged by the process.
Sex		The break neighbour pupils of e movemen if Shapla w	ing schools a ither sex. In t of children were to rema	are single se deed, the no from Shapl ain open, the	ex schools. The ighbouring a into those ere is the re	Therefore, the schools do e schools could risk that t	nere should not have su uld help to b the financial	50% males and 50% female. None of not be a disproportionate impact out an equal breakdown, so the balance this. In addition, as stated a l difficulties would start to adverse ide, thereby impacting on children
		Year	Female	%	Male	%	Total	1
			11					
		11 N1	1 11	1 52%	10	1 48%	21	
		N1 N2	11	52% 0%	10 2	48% 100%	21	
			8					
		N2		0%	2	100%	2	
		N2 R	8	0% 62%	2 5	100% 38%	2 13	
		N2 R 1	8 8	0% 62% 53%	2 5 7	100% 38% 47%	2 13 15	
		N2 R 1 2	8 8 12	0% 62% 53% 67%	2 5 7 6	100% 38% 47% 33%	2 13 15 18	
		N2 R 1 2 3	8 8 12 7	0% 62% 53% 67% 28%	2 5 7 6 18	100% 38% 47% 33% 72%	2 13 15 18 25	
		N2 R 1 2 3 4	8 8 12 7 11	0% 62% 53% 67% 28% 44%	2 5 7 6 18 14	100% 38% 47% 33% 72% 56%	2 13 15 18 25 25	



		case across most prim specific, this should n	•		_				_			_
			% Staff o	of each gender								
		School	Male	Female								
		Shapla	19	81								
		Harry Gosling	6	94								
		St Paul's	27	73								
		Hermitage	16	84								
		English Martyrs	4	96								
		Kobi Nazrul	18	82								
Gender reassignment	X	No impact - We do no	chave any data t	vanuole on till	o protect	.ca cila	deter	13616 1	oi pu	ρii3 0	. Jul	
Marriage and civil partnership		No impact - We do no	t have any data a	available on thi	s protect	ed cha	racter	istic f	or pu	pils o	or stai	f.
Religion or philosophical belief	X	Shapla is not a faith so however, that two of	No impact - we do not have any data available on this protected characteristic for pupils or staff. However, Shapla is not a faith school, we do not expect there to be a disproportionate impact. It should be noted, however, that two of the neighbouring schools are faith schools, which may impact on parental choice: St Paul's is Church of England and English Martyrs is Roman Catholic.									
Race	X	Pupils										
		The main ethnicity of census, is Bangladesh impact; more will be i	i. Therefore, this	group will be in	mpacted	the mo	st bu	t is it	not a			
		Etl	hnicity	N1	N2	R 1	2	3	4	5	6	Total
		Etl Any Other Asian Bac	•	N1	N2	R 1	2	3	1	5	6	Total 5



Any Other Ethnic Group			1	1			1	1		4
Any Other Mixed Background	1									1
Any Other White Background								1		1
Bangladeshi	19	2	12	12	15	21	20	24	25	150
Black - Any Other Black African Background				1	1	2	2	1	3	10
Indian				1						1
White - British									1	1
White and Black African					1		1			2
Total	21	2	13	15	18	25	25	28	29	176

The neighbouring schools that parents are likely to apply to, owing to travel distance and vacancies, have a similar demographic make-up as Shapla, bar one: English Martyrs. As this school is Roman Catholic, predictably there are far more White children attending, of British, Irish or Other backgrounds (65%).

The local authority does advise that multi-cultural schools are likely to be beneficial to fostering good relations between individuals in different ethnic and/or racial groups, as children will have the opportunity to make friends with children from different races to themselves at a formative stage of their personal development. However, there is also an awareness that some parents appreciate the option to choose a school where their child has representation on an ethnic level. Therefore, some parents with white children at Shapla may wish to move their child to English Martyrs for this reason.

School	% Bangladeshi
Shapla	85
Harry Gosling	87
St Paul's	66
Hermitage	61
English Martyrs	1
Kobi Nazrul	92

Staff

The breakdown of staff at Shapla evidences that no one ethnic group of staff will be impacted more than



		employed. As teaching	roles are not syment for st	specific to aff and, as	i will be impacted most as more staff of those ethnicities are any one ethnicity, this should not have a disproportionate stated above, support and help will be given to all displaced.
		Ethnicity	Number	%	
		Any Other White Background	1	3	
		Bangladeshi	16	44	
		Black - Any Other Black African Background	2	6	
		Refused	1	3	
		White - British	15	42	
		White - Irish	1	3	
		Total	36		
	X				
Sexual orientation		No impact - we do not have any data available on this protected characteristic for pupils or staff.			
Pregnancy and maternity	X	No impact - we do not have any data available on this protected characteristic for pupils or staff.			

Other		
Socio- economic	X	The percentage of children receiving FSM does vary across the neighbouring schools, with Shapla being one of the highest. However, as vacancies at neighbouring schools are not dependent on a parent's financial status, we do not anticipate this will have a negative impact on children. Indeed, the speed and agility at which schools



		in LBTH moved to support parents with food vouchers and food parcels during the closure of schools owing to COVID 19 suggests that any children with FSM eligibility will be well supported at school in LBTH.		
		School % Students on FSM		
		Shapla 31%		
		Harry Gosling 39%		
		St Paul's 20%		
		Hermitage 21%		
		English Martyrs 6%		
		Kobi Nazrul 16%		
		The Council may wish to consider whether uniform grants will be provided for parents to purchase a new school uniform if this is required. The uniform grant could resemble the current school clothing grant that is provided for children when they transfer from primary to secondary school.		
Parents/Carers	X	During the informal consultation period, parents raised several questions. They felt Shapla is a good school, so the closure should be staggered over several years, asked if St Paul's schools could "look after Shapla" or another school amalgamate with Shapla. They also wanted to know if small classes could still be kept, or if additional money could be found to support Shapla until numbers increased, all good questions. Shapla is in financial difficulties and, as soon as consultation starts, parents and staff begin to consider their future and some move on. Waiting for numbers to increase or staggering the closure would not result in a positive experience for the remaining staff or children. St Paul's, as with all neighbouring schools, is willing to help Shapla but the financial burden of running a building with too few children in each class would only exacerbate the current financial issues Shapla is facing. No nearby schools have enough space to amalgamate with Shapla. Small classes, although liked by parents, are no longer financially viable as the funding from central government is not enough to support them. In addition, Local Authorities are no longer allowed to make loans to struggling schools that cannot be paid back within three years.		
		Parents and carers should continue to be heavily involved in the consultation process and beyond, should the proposal progress. We are cognizant that this change, after an already stressful few months of lockdown, can		



		be difficult and support should be offered to support parents throughout this process, should the proposal progress.
People with different Gender Identities e.g. Gender fluid, Non-Binary etc	X	No impact - we do not have any data available on gender identity for pupils or staff.
AOB		

Section 5 – Impact Analysis and Action Plan

Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Progress
 Further analysis of workforce data needs to occur 	 Request current workforce data from Shapla 	By end of statutory consultation period, if the proposal progresses to that stage	EF	Data requested
 Further analysis of vacancies to ensure that siblings could move to the same school 	 Data on siblings to be requested from school 	By end of statutory consultation period, if the proposal progresses to that stage	EF	



Bring Annual Reviews for	Assess whether any additional	By end of statutory consultation period,	J'OS	
pupils with SEND at Shapla	resources or support would be	if the proposal progresses to that stage		
forward	needed if the child was to			
	transition to a new school			
		Ongoing throughout academic year	JM	
 Provide support for 	 Parent and Family Support Service 			
parents/carers	to offer targeted support			
Is this enough given the				
negative impact for age – do we				
think that assessment is right?				
Could it be neutral given what				
the text above says about low				
numbers and no adverse				
impact on children				



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? X
No?
Describe how this will be undertaken:
The Primary Review group will monitor and review the action plan



Appendix A

Equality Impact Assessment Decision Rating

Decision	Action	Risk
As a result of performing the EIA, it is evident that a disproportionately negative impact (direct, indirect, unintentional or otherwise) exists to one or more of the nine groups of people who share a Protected Characteristic under the Equality Act. It is recommended that this proposal be suspended until further work is undertaken.	Suspend – Further Work Required	Red
As a result of performing the EIA, it is evident that there is a risk that a disproportionately negative impact (direct, indirect, unintentional or otherwise) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, there is a genuine determining reason that could legitimise or justify the use of this policy.	Further (specialist) advice should be taken	Red Amber
As a result of performing the EIA, it is evident that there is a risk that a disproportionately negatively impact (as described above) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, this risk may be removed or reduced by implementing the actions detailed within the <i>Action Planning</i> section of this document.	Proceed pending agreement of mitigating action	Amber
As a result of performing the EIA, the proposal does not appear to have any disproportionate impact on people who share a protected characteristic and no further actions are recommended at this stage.	Proceed with implementation	Green: