



## Equality Impact Analysis: (EIA)

### Section 1: Introduction

Name of Proposal: Report on outcome of the stage one consultation on the proposal to change the designation of George Green's School Specialist Provision and increase Pupil Numbers.

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

Service area & Directorate responsible: Special Educational Needs, Children and Culture

Name of completing officer: John O'Shea

Approved by Director/Head of Service: Steve Nyakatawa

Date of approval

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, moving to agree the prescribed alterations would reduce inequalities in Tower Hamlets by ensuring primary age children, have access to specialist ASC provision. The proposal is therefore given a GREEN rating.

The new provision is expected to improve opportunities for all children ensuring improved access to a full inclusive curriculum, in a culturally mixed school.

It should also be noted that pupils currently enrolled in the specialist provision – albeit under its previous designation of physical disabilities/complex needs – will not be detrimentally impacted upon. The school will put in place a clear process for transitioning from the current provision to the proposed new provision, which will prioritise continuing support for young people already enrolled with the school.

Because the overall number of places is being increased from 15 to 20 – and because the school's revised specialist focus on ASC will also likely attract additional students with the condition – the school will need to recruit additional specialist staff. The proposal will therefore assist in potentially reducing the risk of redundancy for staff from other schools in Tower Hamlets where staffing is being reduced, through re-organisation and closure.

*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 Council's 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.*

This Equality Impact Assessment concerns the proposal to make prescribed alterations to George Green's School in order to change the designation of the school's Specialist Provision and increase Pupil Numbers in the provision from 15 to 20 places.

The proposed prescribed alteration for George Green's School is that it should:

- Change the designation of George Green's School Specialist Provision from Physical Disabilities/Complex Needs to a specialism in Autistic Spectrum Condition (ASC)
- Increase the number of places in the resource provision from 15 to 20.

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. George Green's School is a fully inclusive successful school with demonstrable expertise and experience in supporting pupils with Special Educational Needs.

Tower Hamlets has reviewed its SEND Strategy to improve the quality and range of provision, in order to optimise life chances for children with special educational needs and/or disabilities.

As part of this work George Green's School have made an application to redesignate their current resource provision from one for children with physical disabilities to a specialist provision for ASC. The designation of George Green's provision is outdated and under the Equalities Act children with physical disabilities can be accommodated with reasonable adjustments in all mainstream schools. The George Green's proposal addresses the lack of a specialist resourced provision for children working at age-appropriate levels with an ASC diagnosis and provides a pathway for secondary pupils who have been in the resource provision at Hermitage Primary School. The model is based on Autism Friendly inclusive approaches, rather than driven by isolation and difference.

The work is being planned and supported through the LA's SEND Teams who play 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. George Green's School has an excellent record of maintaining these principles.



### 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?*

#### Level of Need (Data from SEND Strategy 2020 + SEN2 2021 Updates)

##### Children in Tower Hamlets

Tower Hamlets has a young population. There are 112,900 0-25 year olds in Tower Hamlets. There are also high levels of deprivation in the borough, with 32% of children growing up in poverty. Around 8% of the population was born outside the UK and 75% of primary school children speak a first language which is not English (compared to 54% in Inner London and 21% nationally).

##### Children with special educational need and disabilities

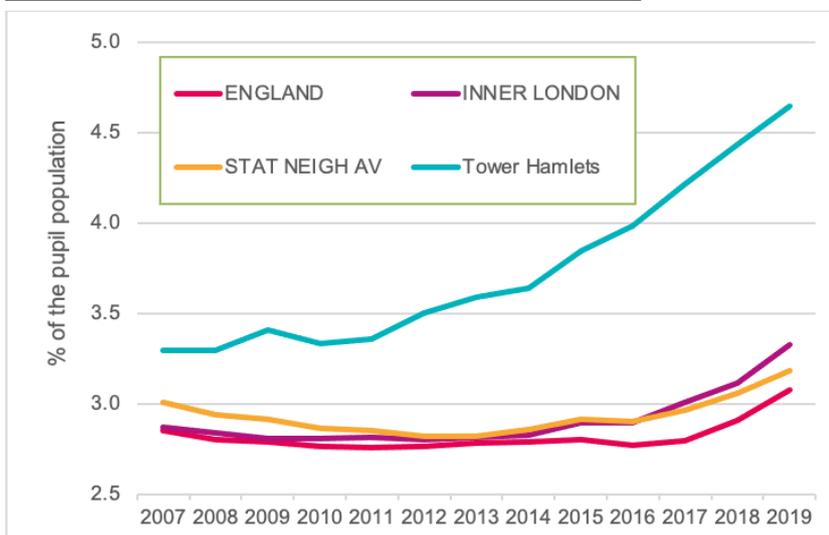
There are approximately 9,000 children and young people between 0 and 25 years with SEND resident in Tower Hamlets. The majority of these are supported by schools using their own budgets.

Approximately 3,500 children are given additional support (and resource) via an Education, Health and Care Plan (EHC plan).

There are more children with a special need in Tower Hamlets than in other areas, approximately 17% of pupils in our schools have a special need or disability, compared to a national average of 16%.

Within schools the percentage of children and young people receiving SEN Support is 11.6%. This is lower than the average for England (12.2%) and comparable with London averages. For children and young people with EHC plans the figure is 5.2%. This is significantly higher than both London (3.9%) and England (3.7%) and continues to increase both locally and nationally.

Figure 1 - EHC Plans as percentage of the pupil population over time, 2007-2019

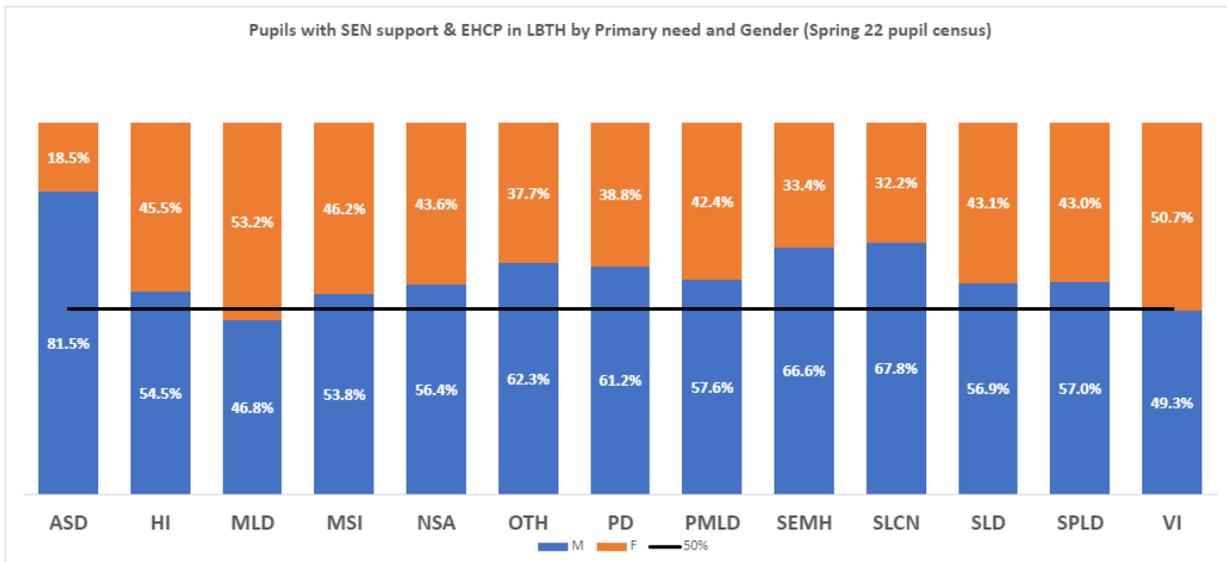




## Children with ASC as their primary need

The proportion of children with ASC as their primary need continues to rise in Tower Hamlets, from 10% in 2017 to 14.1% in 2021. Since 2020 the percentage of children and young people with ASC has been above national averages. The proportion with Speech, language and communication needs (SLCN) is significantly higher than elsewhere at 39.5%. Many children with SLCN needs have undiagnosed ASC or are yet to receive a diagnosis of ASC.

% EHCPs with ASC as primary need	2018	2019	2020	2021
Tower Hamlets	10%	11%	12.8%	14.1%
England	10.3%	11%	11.9%	12.5%



## Ensuring Access to the full Curriculum for all children

Most children with ASC Needs should access a full curriculum in a mainstream school, with support.

Phoenix Special School Outreach Team offers support and advice to Mainstream Schools to help them meet the needs of children with Autistic Spectrum Conditions.

There is currently no identified Secondary School which specializes in integrated mainstream support for children with ASC needs.

Tower Hamlets currently has a specialist ASD School (Phoenix), which will have 480 places for children aged 2 – 19, in the 2022-23 academic year. Children placed at Phoenix are not able to access the Mainstream Curriculum.

A range of consultations fed into the pre-publication consultations for the redesignation of the resource provision at George Green's School.



Following a full review of the school's SEN provision, including the current resource provision, undertaken by an external consultant in February 2019, George Green's School moved to a determinedly inclusive model of SEN Support, enabling students with SEN to have greater access to the mainstream classrooms, supported by a belief that Every Teacher is a teacher of SEND.

Prompted by the Tower Hamlets SEN Strategy and recognising the increasing need for young people with ASC - whose needs present as both social and emotional, rather than learning, the Governing Body at George Green's School expressed an interest in delivering the new proposed provision.

A Steering Group consisting of representatives from the Governing Body, supported by the Independent Consultant and senior school staff has led the work on developing the new SRP-ASC.

It was not possible to hold face to face meetings in person for larger groups at the school or elsewhere during the Stage One consultation period. However, a virtual consultation meeting via Teams was held on 18.5.22. In order to ensure that pupils, parents, staff and the wider community are able to further engage with and respond during the Stage 2 consultation, a range of further opportunities will be organised as follows:

- The Notices will include information on how to make representations, including schools and Local Authority email and postal addresses
- Email address will be provided for representations to the school and Local Authority.
- Further opportunities for parents and staff to meet to raise any issues.

Following closure of the Stage 1 consultation, responses from the different forms of consultation were summarised in a report to Governors and considered at a quorate meeting of the Full GB on 22<sup>nd</sup> June 2022.

Having reviewed the feedback, governors made their decision whether to recommend to council or not to proceed with the prescribed alterations.

A report summarizing the feedback on the consultation will be available for staff and parents after Cabinet reach their decision in July 2021.

Other available evidence

Equality Act 2010

SEND Strategy

Minutes of meetings where the future provision has been discussed

Consultation Document

Consultation Feedback Report

School Policies (Equalities, SEND and Inclusion)



Name of officer completing the EIA: John O'Shea and Terry Bryan

Service area: C&C SPP

EIA signed off by:

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			<p>The prescribed alteration will improve specialist ASC provision and specialist support for secondary children in Tower Hamlets</p> <p>There may be opportunities to employ new staff for the provision.</p> <p>Further work needs to be done in order to assess what job roles will be available, and the age range of applicants and successful candidates.</p>
Disability (Physical, learning difficulties, mental health and medical conditions)	X			<p>Pupils</p> <p>Currently the specialist support for secondary pupils with ASC needs is considered inadequate, with weaknesses in access to the whole secondary curriculum, for children with age-appropriate skills. The new provision would enable access to a significant specialist resource within Tower Hamlets.</p> <p>Pupils with a physical disability at the school will not be disadvantaged as the school will continue to support them, working with the LA SEN service to ensure that needs are met.</p> <p>Staff</p> <p>Any recruitment processes will be mindful of the needs of applicants with SEND and take into account the Equality Act 2010 in order to ensure they are not discriminating against those with disabilities.</p>
Sex			X	<p>Pupils</p> <p>The provision will be co-educational</p> <p>Staff</p> <p>No impact – the prescribed alterations will not impact on existing staff positions.</p>



			X	Recruitment processes will ensure gender equality.
Gender reassignment			X	No impact - We do not have any data available on this protected characteristic for pupils or staff.
Marriage and civil partnership			X	No impact - We do not have any data available on this protected characteristic for pupils or staff.
Religion or philosophical belief			X	No impact - we do not have any data available on this protected characteristic for pupils or staff. However, the school is not a faith school, and as such there is not expected to be any disproportionate impact.
Race	X		X	<p>Pupils 83% of students at George Green's School come from an ethnic minority background.</p> <p>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. George Green's School is a diverse, inclusive school.</p> <p>Staff No impact – staff recruitment processes should ensure attention is paid to recruiting to reflect the local community.</p>
Sexual orientation			X	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	<p>In Tower Hamlets disadvantage is not seen as a barrier to achievement, and gaps in attainment are low. The provision is expected to further enhance outcomes for disadvantaged children.</p> <p>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.</p> <p>62% of George Green's students with an EHCP receive free school meals; 75% receive Pupil Premium Grant.</p>
Parents/Carers			X	<p>Parents and carers responded positively to the Stage One Consultation. Any issues raised were responded to in meetings and through the Consultation Report.</p> <p>Parents and carers should continue to be heavily involved in the consultation process and beyond, as the new provision develops.</p>
People with different Gender Identities e.g. Gender fluid, Non-Binary etc			X	<p>No impact - we do not have any data available on gender identity for pupils or staff.</p>



## Section 5 – Impact Analysis and Action Plan

Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Progress
Provide support for parents/carers	Ensure work with parents and carers embedded in new provision	By end of statutory consultation period,	JO'S	
Ensure children supported to access friendship groups	Ensure this element included in Annual Review	Include in SLA and Ongoing throughout academic year	JO'S	
Ensure continued diversity and inclusion at George Green's School	Governors review and benchmarking of Annual Census data	% of EHC Plans above Borough Levels Ethnic Diversity in governor's staff and pupils reflects the Local Community	Governors	



## 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?

Describe how this will be undertaken:

The SEN Team will monitor and review the action plan as part of SLA Reviews  
The Pupil Planning Team will review the action plan as part of the Annual Admissions Review.

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 Action Planning 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: 